

24/P/00564 - Surrey County Constabulary Police Headquarters Mount Browne, Sandy Lane, Guildford



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Print Date: 23/10/2024

Not to Scale

24/P/00564 – Surrey County Constabulary Police Headquarters Mount Browne, Sandy Lane, Guildford



Appl No:	24/P/00564	6/8/13 week deadline:	11/07/2024
Appl Type:	Full Application		
Parish:	Artington	Ward:	Shalford
Agent:	Vail Williams LLP	Applicant:	Office of the Police and Crime Commissioner for Surrey
Location:	Surrey County Constabulary Police Headquarters Mount Browne, Sandy Lane, Guildford, GU3 1HG		
Proposal:	Redevelopment of Mount Browne headquarters including demolition of 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.		

Executive Summary

Reason for referral

This application has been referred to the Planning Committee by the Joint Assistant Director of Planning.

1. Key information:

- 1.1. Mount Browne is the current headquarters of Surrey Police. 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.
- 1.2. 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. These access points would be closed and only accessible for emergencies on the Mount Browne site. The application is intrinsically linked to 24/P/00563 being the application for the new access road.
- 1.3. In terms of designations, a large part of the site has been removed from the Green Belt in light of the fact that it has been allocated in the Local Plan. The remainder of the site, which is outside the allocation, is within the Green Belt. The entire site is within the Surrey Hills National Landscape (SHNL) (formerly Area of Outstanding Natural Beauty) and Area of Great Landscape Value (AGLV). St Catherines Conservation Area is to the north of the site and the Old House (one of the administration buildings on the campus) is a non-designated heritage asset. There is a large area of ancient woodland to the east of the main campus and two Public Rights of Way skirt the site – footpath 276 which runs along the southern boundary and footpath 277 which runs in a north-south direction along the western boundary.
- 1.4. The topography of the site rises steeply from south to north. The majority of the built form

is located at the top of the site, while there are a number of low-slung training buildings and sports facilities on the lower slope, closer to The Ridges.

- 1.5. There are a large number of trees on the site itself which screen views of the existing buildings from the public and also gives the campus a sylvan appearance. However, the southern half of the site, on the lower slopes, has a more open, parkland appearance.
- 1.6. The proposed application predominantly consists of redevelopment of the site, with most of the works to be within the previously developed areas of the site. The dog school, dog school accommodation and extended sports building would be situated in the Green Belt, in open, low-lying area, along with the maintenance compound to the south of the site.
- 1.7. The proposal seeks to deliver high quality facilities that would meet the Surrey Police's operational requirements.
- 1.8. The application sits along side the other application for the new access road which is included within the agenda (application reference 24/P/00563).

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 loss of and lack of delivery of housing in accordance with the allocation.
- 2.2. However, the benefits of the scheme are substantial and wide ranging. The scheme would deliver high quality facilities to meet the ongoing operational needs of the Police as well as for staff retention and well-being. The proposal would enable the ongoing operation of a world-renowned dog school. Combined these two benefits would enable easier access to communities to ensure they are kept safe and maintain community confidence in the Policing service.
- 2.3. The scheme would also deliver a gas-free development which will achieve a BREEAM 'excellent' as well as rationalise car parking on site and include removal of car parking from within areas of ancient woodland and the RPA of high-quality trees.
- 2.4. Notwithstanding certain identified conflicts with relevant development plan policies above, overall the proposal accords with the development plan when 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.
- 2.5. 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 11 April 2024:

Proposed Site Layout	MTB-SBR-MC-ZZ-DR-A-83000	P01
Mount Browne Proposed Main Site Demolition Plan	MTB-SBR-SW-XX-DR-A-01120	P01
Mount Browne Proposed Main Site Plan	MTB-SBR-SW-XX-DR-A-01125	P02
Mount Browne Proposed Main Site North	MTB-SBR-SW-XX-DR-A-01130	P02
Mount Browne Proposed Main Site South	MTB-SBR-SW-XX-DR-A-01131	P02
Proposed 3D Axonometric Views	MTB-SBR-OH-XX-DR-A-83150	P01
Proposed Site Sections – Sheet 1 of 2	MTB-SBR-AB-XX-DR-A-85010	P2
Proposed Site Sections – Sheet 2 of 2	MTB-SBR-AB-XX-DR-A-85011	P1
Proposed Sections	MTB-SBR-CC-XX-DR-A-85000	P01
Proposed Site Sections	MTB-SBR-CC-XX-DR-A-85100	P01
Proposed Sections	MTB-SBR-CW-XX-DR-A-85000	P02

Proposed Sections	MTB-SBR-DA-XX-DR-A-85000	P-01
Proposed Sections	MTB-SBR-DC-XX-DR-A-85000	P1
Proposed Sections	MTB-SBR-DC-XX-DR-A-85010	P1
Proposed Sections	MTB-SBR-DS-XX-DR-A-85000	P02
Proposed Site Sections	MTB-SBR-DS-XX-DR-A-85010	P01
Proposed Sections Sheet 1 of 2	MTB-SBR-MB-XX-DR-A-85000	P02
Proposed Sections Sheet 2 of 2	MTB-SBR-MB-XX-DR-A-85100	P02
Proposed Sections	MTB-SBR-MC-XX-DR-A-85000	P01
Proposed Sections	MTB-SBR-SB-XX-DR-A-85000	P01
Proposed Sections	MTB-SBR-SW-XX-DR-A-85000	P01
Proposed Elevations	MTB-SBR-AB-XX-DR-A-84000	P1
Proposed Elevations Site Wide	MTB-SBR-AB-XX-DR-A-84010	P1
Proposed Sections	MTB-SBR-AB-XX-DR-A-85000	P2
Proposed East and West Elevations	MTB-SBR-CC-XX-DR-A-84000	P01
Proposed North and South Elevations	MTB-SBR-CC-XX-DR-A-84100	P01
Proposed East and West Elevations	MTB-SBR-CW-XX-DR-A-84000	P02
Proposed North and South External Elevations	MTB-SBR-CW-XX-DR-A-84100	P02
Proposed Elevations	MTB-SBR-DA-XX-DR-A-84000	P01
Proposed Site Elevations	MTB-SBR-DA-XX-DR-A-84010	P01
Proposed External Elevations Sheet 1 of 2	MTB-SBR-DS-XX-DR-A-84000	P02
Proposed External Elevations Sheet 2 of 2	MTB-SBR-DS-XX-DR-A-84100	P02
Proposed East and West Elevations	MTB-SBR-MB-XX-DR-A-84000	P01

Proposed North and South Elevations	MTB-SBR-MB-XX-DR-A-84100	P01
Proposed Elevations Sheet 1 of 2	MTB-SBR-MC-XX-DR-A-84000	P01
Proposed Elevations Sheet 2 of 2	MTB-SBR-MC-XX-DR-A-84001	P01
Proposed East and West Elevations	MTB-SBR-OH-XX-DR-A-84100	P01
Proposed North and South Elevations	MTB-SBR-OH-XX-DR-A-84110	P01
Proposed Elevations Sheet 1 of 2	MTB-SBR-SB-XX-DR-A-84000	P01
Proposed Elevations Sheet 2 of 2	MTB-SBR-SB-XX-DR-A-84100	P01
Proposed North and South External Elevations	MTB-SBR-SW-XX-DR-A-84000	P01
Proposed East and West External Elevations	MTB-SBR-SW-XX-DR-A-84100	P01
Cycle Stores Site Wide	MTB-SBR-SW-XX-DR-A-91100	P1
Ancillary Stores Site Wide	MTB-SBR-SW-XX-DR-A-91101	P1
Proposed Sub Floor Plan	MTB-SBR-DC-CC-DR-A-83000	P2
Proposed Ground and First Floor Plan	MTB-SBR-DC-XX-DR-A-83010	P2
Proposed Second and Third Floor Plan	MTB-SBR-DC-XX-DR-A-83120	P2
Proposed Fourth and Fifth Floor	MTB-SBR-DC-XX-DR-A-83130	P2
Proposed Ground Floor Plan	MTB-SBR-MB-00-DR-A-83000	P01
Proposed Ground Floor Plan in Context	MTB-SBR-MB-00-DR-A-83010	P01
Proposed First Floor Plan in Context	MTB-SBR-MB-01-DR-A-83020	P01
Proposed First Floor Plan	MTB-SBR-MB-01-DR-A-83100	P02
Proposed Second Floor Plan in Context	MTB-SBR-MB-02-DR-A-83030	P01

Proposed Second Floor Plan	MTB-SBR-MB-02-DR-A-83110	P02
Proposed Basement Floor Plan	MTB-SBR-MB-B1-DR-A-83130	P01
Basement and Ground Floor Demolition Plans	MTB-SBR-OH-ZZ-DR-A-82100	P01
First and Second Floor Demolition Plans	MTB-SBR-OH-ZZ-DR-A-82110	P01
Proposed Basement and Ground Floor Plans	MTB-SBR-OH-ZZ-DR-A-83100	P01
Proposed First and Second Floor Plans	MTB-SBR-OH-ZZ-DR-A-83110	P01
Proposed Ground Floor Plan	MTB-SBR-SB-00-DR-A-83100	P01
Proposed First Floor Plan	MTB-SBR-SB-01-DR-A-83110	P01
Proposed Basement Floor Plan	MTB-SBR-SB-B1-DR-A-83000	P01
Proposed First Floor Plan	MTB-SBR-SW-01-DR-A-83100	P01
Proposed Basement and Ground Floor Plans	MTB-SBR-SW-XX-DR-A-83000	P01
Campus Heart – Landscape Proposals	MTB-RPS-SW-XX-DR-L-10104	P02
Woodland Belt – Landscape Proposals	MTB-RPS-SW-XX-DR-L-10105	P02
Main Site Dog School Fencing Proposals	MTB-RPS-SW-XX-DR-L-10108	P01
Main Site – Landscape Sections	MTB-RPS-SW-XX-DR-L-10110	P01
Main Site – Landscape Sections	MTB-RPS-SW-XX-DR-L-10111	P01
Main Site – Landscape Sections	MTB-RPS-SW-XX-DR-L-10112	P01
Proposed Roof Plan	MTB-SBR-CC-RF-DR-A-83120	P02
Proposed Roof Plan	MTB-SBR-CW-RF-DR-A-83120	P02
Proposed Roof Plan	MTB-SBR-DS-RF-DR-A-83120	P02
Proposed Roof Plan in	MTB-SBR-MB-RF-DR-A-	P01

Context	83040	
Proposed Roof Plan	MTB-SBR-MB-RF-DR-A-83120	P01
Proposed Ground Floor and Roof Plan	MTB-SBR-MC-ZZ-DR-A-83100	P01
Roof Demolition Plans	MTB-SBR-OH-RF-DR-A-82120	P01
Proposed Roof Plan	MTB-SBR-OH-RF-DR-A-83120	P01
Proposed Roof Plan	MTB-SBR-SB-RF-DR-A-83120	P01
Proposed Roof Plan	MTB-SBR-SW-RF-DR-A-83120	P02

Received 24 April 2024:

Proposed Ground, First and Roof Plans	MTB-SBR-AB-ZZ-DR-A-83000	P02
Proposed Ground and First Floor Plans	MTB-SBR-CC-ZZ-DR-A-83000	P02
Proposed Ground Floor Plan	MTB-SBR-CW-00-DR-A-83000	P02
Proposed First floor Plan	MTB-SBR-CW-01-DR-A-83100	P02
Proposed Ground, First and Roof Plans	MTB-SBR-DA-ZZ-DR-A-83000	P03
Proposed Ground Floor Plan	MTB-SBR-DS-00-DR-A-83000	P03
Proposed First Floor Plan	MTB-SBR-DS-01-DR-A-83100	P03

Received 30 July 2024:

Mount Browne Phasing Main Site	MTB-SBR-SW-XX-DR-A-01150	P01
Car Park Sketch	MTB-SBR-CP-XX-DR-A-80000	P1
Proposed Elevations Sheet 1 of 2	MTB-SBR-CP-XX-DR-A-84000	P2
Proposed Elevations Sheet 2 of 2	MTB-SBR-CP-XX-DR-A-84100	P2

Received 2 August 2024

Mount Browne Demolition Overlay Plan South Main Site	MTB-SBR-SW-XX-DR-A-01122	P02
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Received 21 August 2024:

Site Wide Landscape Masterplan	MTB-RPS-SW-XX-DR-L-10101	P04
Main Site Landscape Masterplan	MTB-RPS-SW-XX-DR-L-10102	P04
Valley Bottom 1 of 2 – Landscape Proposals	MTB-RPS-SW-XX-DR-L-10106	P03
Valley Bottom 2 of 2 – Landscape Proposals	MTB-RPS-SW-XX-DR-L-10107	P03

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

3. Prior to commencement of each phase of development (as set out on drawing MTB-SBR-SW-XX-DR-A-01150 P01) a Construction Transport Management Plan for each phase of the development 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 commence until a Site Waste Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Management Plan shall demonstrate how waste generated from construction and excavation activities will be dealt with in accordance with the waste hierarchy. The Site Waste Management Plan will subsequently be kept up-to-date throughout the development process in accordance with the established methodology.

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

5. Prior to commencement of each phase of development (as set out on drawing MTB-SBR-SW-XX-DR-A-01150 P01) details of the design of a surface water drainage scheme for each phase of the development has been 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) The results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels. Where infiltration is proposed confirmation is required of a 1m unsaturated zone from the base of any proposed soakaway to the seasonal high groundwater level and confirmation of half-drain times.
- (b) Evidence that the receiving watercourse has onward connectivity and capacity to receive flows from the site.
- (c) 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.
- (d) Construction drawings for all drainage elements including cross sections and detailed drainage layout plan.
- (e) Evidence that the existing on-site drainage is fit for purpose.
- (f) 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.
- (g) Details of drainage management responsibilities and maintenance regimes for the drainage system.

- (h) 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.

- 6. Prior to first use of each phase of the development (as set out on drawing MTB-SBR-SW-XX-DR-A-01150 P01), 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.

- 7. No development shall commence until, a Habitat management and Monitoring Plan (HMMP) has been 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. Timetable for the implementation of the works

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 in accordance with the approved timetable of works.

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

8. No development shall commence, including site clearance and demolition, until a Precautionary Method Statement for Amphibian and Reptiles written by a suitably qualified ecologist has been 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 and to safeguard protected and notable species, in accordance with paragraphs 179 to 190 and section 15 of the National Planning Policy Framework 2023.

9. 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.

10. Prior to commencement of each phase of development (as set out on drawing MTB-SBR-SW-XX-DR-A-01150 P01), 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.
 - (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 agreed 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.

11. Prior to commencement of each phase of development (as set out on drawing MTB-SBR-SW-XX-DR-A-01150 P01) until a detailed lighting scheme for each phase of development has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include the following:
 - (a) The hours of operation of lighting on the site.
 - (b) The appearance, height, type and position of the lighting and angle of glare.
 - (c) The intensity of illumination and predicted horizontal and vertical isolux lighting contours.
 - (d) Evidence that the lighting scheme has been checked by a suitably qualified ecologist and has been prepared in accordance with the recommendations in 'BCT & ILP (2023) Guidance Note 08/23. *Bats and artificial lighting at night*. Bat Conservation Trust, London & Institution of Lighting Professionals, Rugby
 - (e) External lighting on and around buildings.

- (f) Lighting around internal pedestrian routes.
- (g) Achievement of 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.

Reason: To protect the character and appearance of the area, the amenity of existing and future residential properties, to minimise the impact of lighting on bat species and other light-sensitive species and to provide for safe movements around the site.

12. Prior to commencement of phase 2 of the development, as shown on drawing MTB-SBR-SW-XX-DR-A-01150 P01, a scheme shall be submitted to and approved in writing by the Local Planning Authority which includes measures to prevent headlight glare from vehicles using the multi-storey car parking building. The scheme shall thereafter be implemented prior to first use of the building and maintained and retained in perpetuity.

Reason: To protect the amenity of existing and future neighbouring residential properties

13. Prior to commencement of each phase of development (as set out on drawing MTB-SBR-SW-XX-DR-A-01150 P01) , an Arboricultural Method Statement and Tree Protection Plan, in accordance with BS5837:2012 Trees in Relation to Design, Demolition and Construction for each phase of development, shall be submitted to and approved in writing by the Local Planning Authority. The development shall only 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.

14. 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.

15. Prior to the commencement of the development, 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.

The approved signboards shall be constructed in their agreed prior to first occupation of any phase of the development 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.

16. No above ground works (with the exception of site clearance, demolition and ground works) shall take place for each phase of development (as set out on drawing MTB-SBR-SW-XX-DR-A-01150 P01) until details and samples of the proposed external facing and roofing materials for all buildings within the phase, including colour and finish, have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and samples.

Reason: To ensure that the external appearance of the buildings are satisfactory.

17. No above ground works (with the exception of site clearance, demolition and ground works) shall take place for each phase of development (as set out on drawing MTB-SBR-SW-XX-DR-A-01150 P01) until a sample panel for the given buildings which includes all proposed external wall finishes (size of not less than one metre square, showing proposed brick, brick bond, pointing and / or paint finish), have been constructed on site and approved in writing by the Local Planning Authority. Once approved the panel(s) shall remain on site for inspection until the completion of that block for comparison. The development shall only be carried out in accordance with the approved sample panel(s).

Reason: To ensure that the external appearance of the buildings are satisfactory.

18. No above ground works (with the exception of site clearance, demolition and ground works) shall take place for each phase of development (as set out on drawing MTB-SBR-SW-XX-DR-A-01150 P01) until details and drawings of all proposed vents, flues, downpipes, satellite dishes, all roof plant and machinery and lift over-runs for the given building have been submitted to and approved in writing by the Local Planning Authority. The development shall only be carried out in accordance with the agreed details.

Reason: To ensure that the external appearance of the buildings are satisfactory.

19. No above ground works (with the exception of site clearance, demolition and ground works) shall take place until a scheme is submitted to and approved in writing by the Local Planning Authority which includes a phasing plan for vehicle parking (as set out in the approved plans) and details of the how the spaces will be delivered. The spaces shall thereafter be laid out within the site in accordance with the approved plans for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking and turning areas shall be retained and maintained for their designated purposes.

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.

20. No above ground works (with the exception of site clearance, demolition and ground works) shall take place until a scheme is submitted to and approved in writing by the Local Planning Authority which details the timing of delivery for the measures set out in the approved Travel Plan, dated 29 July 2024, Rev 02. The measures shall thereafter be implemented in accordance with the approved scheme and maintained and developed to the satisfaction of the Local Planning Authority.

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.

21. No above ground works (with the exception of site clearance, demolition and ground works) shall take place until details and a scheme are submitted to and approved in writing by the Local Planning Authority which includes details of timing of delivery and a phasing plan to deliver each the following over the site,

- (i) 2 of the available parking spaces are provided with a rapid charge Electric Vehicle charging point;
- (ii) 50% of all new parking spaces are provided with a fast-charge Electric Vehicle charging point (current minimum requirements – 7 kw Mode 3 with Type 2 connector – 230v AC 32 Amp single phase dedicated supply);
- (iii) The remainder of new parking spaces are provided with cable routes for the future provision of charging points.

Thereafter, the development shall be implemented in accordance with the approved timing of works and phasing plan and retained and maintained to the satisfaction of the Local Planning Authority.

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.

22. No above ground works (with the exception of site clearance, demolition and ground works) shall take place until details and a scheme are submitted to and approved in writing by the

Local Planning Authority which includes details of timing of delivery and a phasing plan to deliver each of the following over the site:

- (i) Facilities for high quality, secure, lit and covered parking of bicycles;
- (ii) The provision of charging points with timers for e-bikes by said facilities; and
- (iii) The provision of lockers, changing rooms and showers.

Thereafter, the development shall be implemented in accordance with the approved timing of works and phasing plan and retained and maintained to the satisfaction of the Local Planning Authority.

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.

23. No above ground works (with the exception of site clearance, demolition and ground works) shall take place until details and a scheme are submitted to and approved in writing by the Local Planning Authority which includes details of timing of delivery and a phasing plan setting out lit pedestrian and cyclist routes within the site, as well as priority crossing points at all internal junctions. Thereafter the facilities shall be provided in accordance with the approved details and scheme, retained and maintained to the satisfaction of the Local Planning Authority.

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.

24. The individual buildings within each phase hereby approved (as set out on drawing MTB-SBR-SW-XX-DR-A-01150 P01) shall not be first used until full details, of both hard and soft landscape proposals for that phase, including a schedule of landscape maintenance for a minimum period of ten years, have been 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 and made available for use prior to the occupation of each phase and retained thereafter.

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

25. 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.

26. No part of the development hereby approved shall be first brought into use unless and until a scheme for the following measures has been submitted to and approved in writing by the Local Planning Authority:
- (i) The provision of a formal crossing on one of the arms of Artington roundabout; and
 - (ii) The provision of a cycle lane along Old Portsmouth Road.

Thereafter the approved works shall be implemented prior to first use of any phase of the development and retained and maintained in perpetuity.

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.

27. No part of the development shall be brought into first use unless and until a scheme has been submitted to an approved in writing by the Local Planning Authority for droppable bollards at Sandy Lane. The scheme shall thereafter permanently retained and maintained in perpetuity.

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.

28. No part of the development shall be first brought into use unless and until a regular Vehicle shuttle bus is provided between the site and Guildford train station, in accordance with the details set out in the approved Interim Travel Plan, dated 29 July 2024, Rev 02 and thereafter it shall be provided to the satisfaction of the Local Planning Authority.

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.

29. Prior to occupation of each building, a BRE issued New Construction (or Refurbishment and Fit-Out) Post Construction Certificate shall be submitted to, and approved in writing by the Local Planning Authority, that shows that a BREEAM rating of Excellent has been achieved for each component of the development. In the event that such a rating is replaced by a comparable national measure of sustainability for building design, the equivalent level of measure shall be applicable to the proposed development.

Reason: In the interests of reducing carbon dioxide emissions and promoting principles of sustainable construction and efficient use of buildings, and to ensure that the development achieves the approved BREEAM rating in accordance with LPSS Policy D2 (2).

30. The proposed vehicular access to Sandy Lane and The Ridges shall be used for vehicles accessing the Mount Brown campus in emergency only following practical completion of the access road approved under application 24/P/00563 and unless the access road is blocked..

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.

31. The dog school accommodation shall only be used for students in association with the dog school.

Reason: to ensure the accommodation is not occupied on a permanent basis to the mitigate any harm on the openness of the Green belt and on the landscape character of the area.

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 14.35 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. In terms of designations, a large part of the site has been removed from the Green Belt in light of the fact that it has been allocated in the Local Plan. This will be discussed in greater detail later in the report. The remainder of the site, which is outside the allocation, is within the Green Belt. The entire site is within the Surrey Hills National Landscape (SHNL) (formerly Area of Outstanding Natural Beauty) and Area of Great Landscape Value (AGLV). St Catherines Conservation Area is to the north of the site and the Old House (one of the administration buildings on the campus) is a non-designated heritage asset. There is a large area of ancient woodland to the east of the main campus and two Public Rights of Way skirt the site – footpath 276 which runs along the southern boundary and footpath 277 which runs in a north-south direction along the western boundary.
- 3.5. The campus contains a large number of buildings which have been constructed mainly over the last 70 years since the site has been occupied by Surrey Police. These range from single to three storey structures which house the operational buildings used by staff. There is no longer any residential accommodation on the site. There are also a number of formal and informal car parking areas spread across the campus to accommodate the large vehicle presence on the site.
- 3.6. The topography of the site rises steeply from south to north. The majority of the built form is located at the top of the site, while there are a number of low-slung training buildings and sports facilities on the lower slope, closer to The Ridges.
- 3.7. There are a large number of trees on the site itself which screen views of the existing buildings from the public and also gives the campus a sylvan appearance. However, the southern half of the site, on the lower slopes, has a more open, parkland appearance.
- 3.8. 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 University of Law campus which is also an allocated site in the Local Plan. It is understood that the University has, or is in the process of, moving to a new site. 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. The proposal is for the redevelopment of Mount Browne headquarters including demolition of 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.
- 4.2. The proposed development would include the following building works

Main Building

- 4.3. The proposed main building is located to the north of the Old House and Courtyard Wing. It would connect to both the Courtyard Wing and Old House by a central hub space on its southern end. The western wing of the building would measure 10.4m in width and 34.45m in length. The eastern wing would measure 16.7m in width and 46.3m in length, connected to the western wing by a 7m wide corridor. It would feature three floors with a height of 12.5m above the finished floor level of the building.

Old House

- 4.4. The Old House would be refurbished only, with no demolition works proposed.

Courtyard Wing

- 4.5. The Courtyard wing would be partially demolished with the removal of a pentagon shaped appendage to the north of the building. The building would be refurbished thereafter including internal floor layout changes, overclad and connected to the hub space as referred to above, replacement windows, new vertical balustrade railings on the single storey roof to the east of the building and a new external fire escape stair.

Service Wing

- 4.6. This building would be retained and refurbished. Refurbishments include internal layout changes, replacement windows, cladding changes, and new north elevation ventilation louvres.

Munstead Building

- 4.7. The proposed Munstead Building would be two-storeys and situated within the footprint of the existing dog school. The building would have a height of 8.7m (to the ridge), with the plant extending a further 2.35m above that.

Ancillary Building

- 4.8. The proposed ancillary building would be two-storeys with a height of 6.7m.

Multi-storey car park

- 4.9. The proposed multi-storey car park would be situated at the north-eastern corner of the site and would measure 66m in length and 34.5m in width. It would feature a split-level design with the tallest level being 7.5m in height above the entrance level and 9m above the lowest sub level. It would accommodate 290 parking spaces for Police staff.

Ancillary Facilities

- 4.10. Two ancillary buildings are proposed which would be situated in the footprint of the existing housing. These would be small, single storey buildings with heights of 3.295m.

Dog School

- 4.11. The proposed dog school would be a two storey building with 50 kennels. The ground floor measures 32.5m in length and 14.2m in width. The first floor would measure 26.2m in length and be set in by 4.2m on the eastern side and 2.4m on the western side. The building would be 7.7m in height from finished ground floor level to the roof parapet.

Sports Building

- 4.12. The southern part of the sports building would be extended 18.5m to the east and would feature a pitched roof that matches the existing building.

Dog School Accommodation

- 4.13. The proposed dog school accommodation building would be set over two storeys with twenty bedrooms for visiting staff. It would be located with the south of the dog school, and measure 20.3m in length and 13.9m in width. The dog school accommodation would be 7.5m in height above the ground floor entrance level.

Access

- 4.14. The development would obtain access from the proposed access road that is the subject of a separate application (reference 24/P/00563). The site would retain the existing access points from The Ridges and Sandy Lane for emergency access only. Emergency access in this case means emergencies on the site only.

Vehicle and cycle parking

- 4.15. The proposed development would deliver a total of 834 formal car parking spaces including 22 visitor and 31 disabled spaces over the site. This would be an uplift of 303 formal spaces
- 4.16. The proposed development would deliver 84 cycle parking spaces within secure and sheltered stores.

Supporting documents:

- 4.17. The application is supported by the following technical documents:
- Utility Statement

- Flood Risk Assessment
- Archaeological Desk Based Assessment
- Landscape Plans
- 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
- Needs statement
- BREEAM Pre-assessment summary
- Travel Plan
- Energy Statement

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.

Reference:	Description:	Decision Summary:	Appeal:
24/P/00563	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.	Reported elsewhere on this agenda	N/A

5.2. Other relevant planning history in the surrounding area:

Reference:	Description:	Decision Summary:	Appeal:
23/P/01850 – The University of Law Braboeuf Manor,	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	To be determined	N/A

Portsmouth Road, GU3 1HA	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 th September 2024).			
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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. Active Travel England: Active Travel England has determined that standing advice should be issued and would encourage the local planning authority to consider this as part of its assessment of the application.
- 6.2. County Highway Authority: No objections subject to the imposition of conditions.
- 6.3. Environment Agency: No response received.
- 6.4. Natural England: No objection raised. Natural England note that impacts on the nationally designated landscape and the delivery of its statutory purpose to conserve and enhance the area's natural beauty can be determined locally by the local planning authority, with advice from its landscape or planning officers, and from the relevant National Landscape Partnership or Conservation Board.
- 6.5. County Archaeologist, Surrey County Council: The application is supported by a desk based archaeological assessment produced by RPS Consulting that has examined all relevant and currently available sources including the Surrey Historic Environment Record in order to determine the archaeological potential of the site and the impact of the proposals on any heritage assets in the vicinity. The report concludes that the proposals will not impact upon any known heritage assets but that site is considered to have a moderate potential for medieval and post medieval remains with a low/uncertain potential for earlier periods. In order to identify any archaeological deposits and to enable appropriate mitigation measures to be devised the assessment recommends that a programme of trial trench evaluation would be appropriate for the new build outside of the previously developed areas. This will enable the identification of any buried remains that may be present and allow suitable mitigation measures to be devised if necessary. In order to secure the initial archaeological; investigation and any subsequent mitigation work that may be required it is advised that this be controlled by a planning condition.

Internal consultees

- 6.6. Head of Environmental Health and Licensing: No objection subject to conditions
- 6.7. Head of Parks and Countryside: No response received.
- 6.8. Conservation and Design: The proposed scheme is considered to be a well-considered, well-designed proposition that is respectful to the architectural and historical significance of the host heritage asset as well as the surround historic environment. In addition, it is noted that all of the works preserve the character and appearance of St Catherine's Conservation Area.

Non-statutory consultees

- 6.9. Surrey Hills Area of Outstanding Natural Beauty Officer Planning Advisor (AONB Planning Advisor): The AONB planning advisor does not object to the application.
- 6.10. Surrey County Council, Countryside Access: No objections raised.

Parish Council

- 6.11. Shalford Community Council: The Community Council note no objections to the proposal. A number of comments are provided, however, these relate solely to the associated application for the new access road. These comments will therefore be reported under that application.
- 6.12. Artington Parish Council: no response received.

Amenity groups / Residents Associations

- 6.13. Guildford Society: The Guildford Society have provided the following comments on the application, but neither support nor object to the proposal.
- the Society welcomes the redevelopment of this site to continue in use as the Surrey Police HQ;
 - the redevelopment preserves an important civic service in Guildford and also supports local employment opportunities;
 - although it isn't a listed building, the Society supports the preservation of the Old House (1840's) as the central building in the redeveloped site;
 - there are to be 197 additional vehicles on the site compared to the existing. The Society notes that there are no details as to why this is the case;
 - the proposed multi-storey car park (MSCP) is at the approximate height of the existing buildings. The Society note that the impact of the building has been poorly evaluated, as it is in a high position at the back of the site. The Landscape Visual Impact Assessment does not show before and after details, so it is difficult to understand the impact of the MSCP. The MSCP is also adjacent to the ex-Law College site where new buildings are proposed to the north of the MSCP. How these proposed buildings interrelate needs to be reviewed;
 - concerns regarding reflections from cars on the top level of the MSCP;
 - the proposed aluminium mesh for the MSCP would be incongruous in a green setting [*Officer Note: the MDCP would not be mesh, but be clad in metal 'fins' which would be coloured brown*];

- surprising that there is no energy generating on some of the parking areas.

6.14. Third party comments

6.15. Bell Cornwall (private 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: this has been considered and it is agreed that the applications are connected].
- A change of use is occurring which is not reflected in the description of development [Officer note: the application site has sui generis use and this is not proposed to change].
- 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]]
- 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].
- Dog school would be located nearer to private residential houses and noise assessment fails to adequately consider the noise impact.

6.16. It should be noted that the objection received related to both this application and the access road application (24/P/00563) 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. Members can view the comments in full on the Council's website.

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) 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 D20: Conservation Area
Policy D23: Non-designated Heritage Assets
Policy ID10: Parking Standards for New Development

7.4. Surrey Hills AONB Management Plan (AONBMP) 2020-2025

Planning Management Policies, P1, P2, P3 and P6

7.5. Supplementary planning documents

Parking Standards for New Development (2023)
Healthy Streets for Surrey (2022)
Climate Change, Sustainable Design, Construction and Energy SPD (2024)
Planning Contributions SPD 2017 (updated in April 2022)
Thames Basin Heaths Special Protected Area Avoidance Strategy SPD (2017)
Landscape Character Assessment (2007)
Green Belt SPD (2023)

7.6. Environmental Impact Assessment

7.6.1. 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

8.1. The main planning considerations in this case are:

- The principal of development
- Impact on the Green Belt
- Impact on Conservation Area and non-designated heritage asset
- 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
- Climate change and sustainability
- Thames Basin Heath Special Protection Area
- Legal agreement requirements
- Planning balance and conclusion

8.2. The principal of development

- 8.2.1. Paragraphs 123 and 124 of the National Planning Policy Framework (NPPF) state that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment; encourage multiple benefits from urban land.
- 8.2.2. Under the adopted Guildford Borough Local Plan: Strategy and Sites (LPSS) this site, together with a number of other 'major previously developed sites' across the borough, were inset or removed from the Green Belt on the basis that they do not contribute to the openness of the Green Belt. The Green Belt boundaries for these sites were also informed by the extent of the built area so hence some of the wooded/vegetation areas of the application site are still in the Green Belt.
- 8.2.3. Part of the site that is inset is allocated in the LPSS – site allocation A33 – for 116 C3 homes, including some self-build and custom house building plots.
- 8.2.4. The site was allocated for housing as at the time of the preparation of the Plan, it was the intention of Surrey Police to vacate the Mount Browne site. It is acknowledged that the current proposal would not include any housing, but would also result in the demolition and loss of the existing police housing on the site. Albeit noting that these have not been used for housing for a number of years and are now functioning as over-flow office space for Police staff.
- 8.2.5. The site was allocated on the basis that the existing use was surplus to requirements and following the sites removal from the Green Belt, could offer a sustainable brownfield site for residential use. The allocation therefore has not been counted towards the five year housing land supply. While the delivery of further housing would be desirable, the Council would gain the retention of the Mount Browne site as an important and large employer and community asset within the Borough. Further, the Applicant cannot be forced to deliver an

allocation and they are entitled to pursue other options if the need or desire arises.

- 8.2.6. The proposed development would therefore result in a technical conflict with Policy H1(2) which indicates that 'significant reductions from the approximate housing numbers ... and housing uses as set out in the site allocations will be resisted' and Policy A33 which allocates the site.
- 8.2.7. It is clear that the proposed development would be contrary to Policies H1 and A33. Paragraph 12 of the NPPF states where proposed development conflicts with an up-to-date Local Plan, the application should be refused unless other material considerations indicate otherwise. The relevant material considerations will be set out and discussed in the planning balance.

8.3. Impact on the Green Belt

- 8.3.1. Due to the allocation of Mount Browne in the LPSS, a large proportion of the site now sits outside of the Green Belt. As such, the only part of the proposed application which is now within the Green Belt is the lower valley area where the existing driving training school and sports building are located. Here, in the Green Belt, the proposal would see the construction of the proposed new dog school, the accommodation block associated with the dog school, an extension to the sports building and the provision of new car parking areas.
- 8.3.2. In addition, some re-modelling would take place to Ridge Farm which is located to the south of the main access into the site from The Ridges. This area of the site is also within the Green Belt. Here the proposal would include the demolition of some existing buildings and their replacement with a new 'L' shaped structure. The new collection of buildings at Ridge Farm would become the maintenance compound for the campus.
- 8.3.3. In terms of the policy context, Policy P2 of the LPSS and Chapter 13 of the NPPF are generally consistent with each other. Paragraph 154 of the NPPF states that a 'local planning authority should regard the construction of new buildings as inappropriate in the Green Belt'.
- 8.3.4. While there are a number of exceptions to this, the proposal does not sit comfortably within any of them. As such, the elements of the proposal which are located within the Green Belt are considered to represent inappropriate development. This stance is agreed by the applicant in the submitted Planning Statement.
- 8.3.5. In addition to the definitional harm resulting from this part of the proposal being inappropriate development, this element of the scheme would also result in harm to the openness of the Green Belt. This through the introduction of additional floorspace and new, relatively large buildings. In addition, new areas of car parking would also harm openness not only through the provision of hardstanding but also the parking of vehicles, albeit that this would be a temporary occurrence. Furthermore, the proposal would conflict with one of the five purposes of including land within the Green Belt - to assist in safeguarding the countryside from encroachment.
- 8.3.6. Having noted the above, it must also be acknowledged that through pre-application discussions with the applicant, the harm to the Green Belt has been reduced through pre-submission amendments to the scheme. The applicant has also made a conscious effort

to site the vast majority of the new and replacement buildings within the main heart of the campus, which as explained above, is not within the Green Belt.

- 8.3.7. 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'.
- 8.3.8. The applicant has set out a case for very special circumstances within the submitted Planning Statement. In summary, they are:
- the current dog school dates from 2000 and is now dated and no longer fit for purpose. It therefore needs to be replaced to enable Surrey Police to continue to operate its high-quality dog unit.
 - The dogs and dog school are a vital part of the police operation and help to protect officers and the public against threats of knife and firearms, digital protection, drugs, counter terror and victim protection.
 - The dog school is internationally recognised and provide and train police dogs for numerous airports and forces around the world. This provides a very valuable income stream for Surrey Police, in the order of approximately £500,000 annually which is re-invested in front line policing in the county.
 - the dog school needs to be in a secure position and located in very close proximity to other key training facilities (taser and public safety training). This is a key reason why the school needs to be situated at Mount Browne.
 - An alternative site search has been carried out and no other sites have been found which would meet the needs of the force and which would be less harmful in terms of Green Belt, amenity, landscape etc.
- 8.3.9. 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.

8.4. Impact on Conservation Area and non-designated heritage asset

- 8.4.1. As noted above, the application site is adjacent to, but outside of, St Catherines Conservation Area. The site also contains a non-designated heritage asset known as The Old House, which is currently used for office and administration space by Surrey Police.
- 8.4.2. 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.
- 8.4.3. 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'.

8.4.4. 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'.

8.4.5. 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.

8.4.6. 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.

8.4.7. Policy D18 relates to development within or in the setting of a conservation area. It notes that:

- development proposals within or which would affect the setting of a Conservation Area are expected to preserve or enhance its special character and appearance. Where harm to/loss of significance is identified this will be considered against Policy D16(3): Designated Heritage Assets.
- development proposals are required to show how they respect and respond to the history of place, the surrounding context and the preservation or enhancement of the Conservation Area's special character and local distinctiveness, by having regard to: a) the retention of buildings, groups of buildings, existing street patterns of the area, building lines and ground surfaces, and the impact on significant open spaces; b) the retention of architectural details and features of interest that contribute positively to the character and appearance of the area, such as windows, doors, and boundary treatments; c) the protection, and where appropriate, the enhancement of key views and vistas, to, from and through a Conservation Area; and d) the protection of trees and landscape that contribute positively towards the character and appearance of the area.
- development proposals within or which would affect the setting of a Conservation Area are required to be of a high-quality design and are expected to take the opportunity to enhance the special interest of the area. They are required to reinforce or complement the character and local distinctiveness and characterisation of the Conservation Area, including having regard to: a) size, height, bulk, massing, scale, layout, landscape and

appearance; b) the use of good quality sustainable building materials and detailing, appropriate to the locality and sympathetic in colour, profile and texture; and c) maximising opportunities to mitigate and adapt to climate change through energy efficiency improvements.

8.4.8. Policy D23 of the LPDMP concerns non-designated heritage assets. It notes, inter alia, that:

- development proposals affecting Non-designated Heritage Assets and their setting are required to be supported by an evidence-based statement of significance. The level of detail provided within the statement is expected to be proportionate to the asset's importance and sufficient to facilitate an informed assessment of the significance of the asset and its setting, and the impact of the proposed development on that significance.
- development proposals are expected to preserve or enhance the significance of non-designated Heritage Assets, with an expectation that development proposals: a) respond to and respect the special architectural and historical interest of the heritage asset and its local importance; and b) are designed and sited so as to conserve the asset, any features of interest and its setting.
- development proposals which result in harm to, or loss of the significance of a non-designated Heritage Asset, or their contribution to the character of a place will be considered in line with national policy and guidance.

8.4.9. St Catherines Conservation Area:

8.4.10. St Catherine's Conservation Area lies on the southern approach to Guildford. The River Wey forms the eastern boundary and extends northwards to include the rear gardens of properties in Guildown Road. The southern boundary includes the College of Law (Braboeuf Manor) and Treetops on Old Portsmouth Road. The area was first designated by Surrey County Council in October 1969, making it one of the borough's earliest conservation areas. Subsequent reviews have been conducted by Guildford Borough Council in 1991 (revised to include parts of Sandy Lane and Braboeuf Manor) and in 2005.

8.4.11. The conservation area contains an interesting range of important buildings spanning many centuries, such as the fourteenth century St Catherine's Chapel, sixteenth century timber framed buildings (Braboeuf and Piccard Manors), as well as a range of nineteenth and twentieth century properties by notable architects such as Lutyens and Norman Shaw. Substantial growth of Guildford in the nineteenth century transformed the area into a Victorian residential suburb.

8.4.12. The section of the conservation area closest to the application site contains the nucleus to the historic hamlet of St Catherine's, that developed around the fourteenth century St Catherine's Chapel. As a result, it contains the earliest dated properties within the conservation area, as well as a historic road pattern.

8.4.13. The topography of the area is very distinctive and has been instrumental in shaping the settlement pattern and for facilitating inward and outward short and long distance views. Of particular note is the road cutting through St Catherine's Hill, which has formed dramatic cliff-like ironstone walls on either side lined by trees, with the resultant sense of enclosure helping to form the gateway in and out of the conservation area, and framing the first views of the old village. Tree and vegetation in general contribute heavily to the area's verdant character, of particular note are those within and surrounding the application site. This

resultant verdancy serves as a constant reminder of the area's peripherality to the countryside beyond.

8.4.14. The significance of the conservation area can be summarised as:

- built form is generally low scale (2-3 storeys)
- distinctive topography which has been instrumental in shaping the settlement pattern and providing inward and outward short and long-distance views.
- vistas, up, down and along sloping and linear streets help in terminating views, providing enclosure, and a sense of place.
- substantial buildings on sloping ground set back from the road within spacious plots.
- individually designed buildings of high architectural quality.
- careful attention to detailing for example brick arches, window proportions and materials.
- tree and vegetation contribute heavily to the area's verdant character and serves as a constant reminder of the area's peripherality to the countryside beyond.

8.4.15. The demolition and rationalisation of a significant number of existing structures and buildings on site is considered to preserve the setting of the conservation area and thus is fully supported. In all instances these are contemporary additions to the site and are of no architectural or historic significance which is sufficient justification for their removal.

8.4.16. In terms of the proposed replacement structures the design and scale of these additions are considered to be sympathetic to the surrounding and prevailing landscape and topographical context. Equally, the cohesive nature of the masterplan as a whole is seen as a significant enhancement to the existing piecemeal, ad hoc character of the site.

8.4.17. As such, the proposed development would preserve and enhance the setting of the conservation area and no harm to its significance has been identified.

8.4.18. *The Old House (Non-designated heritage asset):*

8.4.19. The Old House is situated within the heart of the Mount Browne campus and is currently used as an administration / office building. The gothic styled 3-storey mansion house dates from the mid-nineteenth century and is constructed from red brick and covered over by a complex arrangement of tiled roofs which are accented by tall brick chimney stacks. The property's principal elevation is its western flank which is principally defined by the main entrance that is composed of a heavy timber door decorated with ironwork, that is set within a porch flanked by double columns.

8.4.20. Internally the building has been much altered during the course of the mid to late twentieth and early twenty first century as a result of its conversion from a single residence to its now administrative use, yet it retains its primary floor plan as well as significant degree of decorative fabric, particularly at ground floor level.

8.4.21. The setting of the asset is one which has undergone a substantial degree of change following the acquisition of the site by the Surrey Constabulary and as a result has fundamentally altered the way in which the property is experienced.

8.4.22. To the immediate west of the Old House is an extensive area of hardstanding used for car parking. A further area of car parking is found immediately to the north of the asset,

together with The Main Building which is a 1960's addition to the site which physically adjoins to the north elevation of the Old House at ground and first floor level. This building is four-storeys in height and is of concrete frame construction that is part clad in brown brick and flint. Architecturally, it is a structure that contrasts with the style and materiality of the Old House.

8.4.23. A lawned area, representing a surviving element of the property's original formal gardens extends to the east of the Old House. This formal lawned area is flanked to its north by a part single, part two-storey, red brick constructed structure known as The Courtyard Wing, which was added to the site during the 1960's. Further to the east and north-east are further areas of modern hardstanding and operational development, including The Service Wing, The Core Operational Building, the Munstead View terraces and The Dog School.

8.4.24. The significance of The Old House can be summarised as:

- derives architectural and historic interest from its nineteenth century date of origin;
- use of vernacular material and traditional building techniques in its construction;
- quality of its external and internal design, materials and craftsmanship; and
- good example of a then popular gothic style for new mansions.

8.4.25. In terms of the impact of the proposal, it is noted that the planned refurbishment works to the Old House have been designed around the retention of historic built fabric. The primary alterations that are sought comprise of the removal of some internal partitions to enable the opening up of some internal spaces to facilitate modern office accommodation and improved circulation; the installation of a lift shaft and buildings service alterations. The majority of fabric affected by these works are of limited historic significance and the interventions to be made are deemed to not diminish the legibility of the property's historic layout and cell structure.

8.4.26. As regards the impact on its setting, it is noted that the demolition and rationalisation of a significant number of existing structures and buildings on site is considered to be positive to the wider setting of this non-designated heritage asset. In all instances these are contemporary additions to the site and are of no architectural or historic significance which is sufficient justification for their removal. Furthermore, it is considered that their removal, individually and collectively, would significantly help to improve and enhance the setting of the Old House.

8.4.27. In terms of the proposed replacement structures the design and scale of these additions are considered to be sympathetic to the architectural form and materiality of Old House as well as the prevailing landscape and topographical context. Equally, the cohesive nature of the masterplan as a whole is seen as a significant enhancement to the setting of the asset. Therefore, the proposed development does not affect the significance of this heritage asset and thus no harm has been identified.

Summary on heritage assets:

8.4.28. Due to the considered and careful design of the proposal, the development would not lead to any harm to the setting of St Catherines Conservation Area or to the setting and significance of The Old House. As such, the proposal is considered to be consistent with policies D16, D18 and D23 of the LPDMP, policy D3 of the LPSS and the provisions set out in the NPPF.

8.5. Landscape and visual impact

- 8.5.1. The application site is located within the SHNL and AGLV, which extends over both this site and the site of the proposed access road.
- 8.5.2. 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.
- 8.5.3. 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 (AONBs). Any reference to Areas of Outstanding Natural Beauty should be read as referring to National Landscapes.
- 8.5.4. Policy P1 of the LPSS further 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.
- 8.5.5. 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 further 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.
- 8.5.6. 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.
- 8.5.7. 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'.
- 8.5.8. Also relevant to the landscape impacts of this proposal is the Guildford Landscape Character Assessment (GLCA), 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. This 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.

- 8.5.9. The application site lies within the Guildford Landscape Type L Open Greensand Hills, Landscape Character Area L1: Shackleford Open Greensand Hills and Rural-Urban Fringe Character Area L1: Braboeuf Manor-Mount Browne Rural-Urban Fringe. 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.
- 8.5.10. Under the Surrey Landscape Character Assessment (SLCA), places the application site mostly in the urban area of Guildford, though the southern part of the site lies within Area GO1 Shackleford Open Greensand Hills, with land to the south of the site (generally south of Footpath 276, thus including the red line boundary of the proposed access road) is Area MP1 Loseley Mudstone Plateau. The landscape strategy for the Open Greensand Hills landscape type, “is to conserve the pastoral landscape, the intimate valleys, historic villages, scattered farmsteads, woodlands and heath. Opportunities for enhancement are in management of the hedgerow network and the woodland and heath, and in new woodland planting to screen visually intrusive elements”.
- 8.5.11. Furthering the purpose of protected landscapes:
- 8.5.12. 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:
- 8.5.13. 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”.
- 8.5.14. The Applicant has provided, through a further supplementary statement, the measures proposed to demonstrate these duties have been met. These measures include additional planting around the site, including to the west of the training building, opposite the maintenance building and a new area of woodland adjacent to Portsmouth Road in land in the Applicant’s ownership.
- 8.5.15. 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. While this signboard would be a positive benefit, given there are two PRows that run around the site as set out previously, it would be appropriate to require an additional signboard along footpath 277 to improve public visibility and reach.

8.5.16. Through implementation of these measures it is considered the proposed development would enhance the appreciation of the landscape and scenic beauty of the SHNL as well as enhance the special landscape qualities, in accordance with the aims of the Surrey Hills AONB Management Plan. It is therefore considered that the Applicant has met this further duty.

8.5.17. Site design landscape character areas

8.5.18. The proposed development has been separated into three distinct landscape character areas which have been used as a basis for the proposed design. These areas are intended to reflect the landscape qualities of the area and the physical characteristics of the site. These areas are:

- Campus Heart
- Woodland Belt
- Valley Bottom.

8.5.19. The Campus Heart is located on higher ground and includes the Old House, Main Building, Courtyard Wing and Service Wing. This area includes the concentration of built development on the site. The character features used to design the proposed development in this area include mid-heavy weight buildings with the principal use of red brick, red tile hung and stone detailing.

8.5.20. The Woodland Belt consists of the Munstead Building, Block A and B Building, the multi-storey car park building along with the surrounding surface parking and the Ancillary Building. This area is set below the Campus Heart and includes area of ancient woodland to the east of the site as well as the woodland that separates this character area from the Valley Bottom. The character features used to design the proposed development in this area include lightweight and discreet architecture, both in design and materiality. Materiality consists of the use of red brick, rainscreen cladding and timber.

8.5.21. The Valley Bottom consists of the dog school, dog school accommodation, sports building, along with the surface car parking and surrounding training facilities and maintenance compound. This is a low-lying area which mainly consists of open grassland with a scattering of trees. The Valley Bottom is bordered by two public rights of ways, one to the south (footpath 276) and one to the west (footpath 277). The Surrey agricultural vernacular has been used to form the design of proposed development within this area, with buildings being of a lightweight design and materials like blackened timber cladding on top of brick bases used.

8.5.22. 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). The LVIA used the SLCA as a baseline for the assessment noting that this is the most recently undertaken study for the area.

8.5.23. Landscape impact:

8.5.24. 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*

8.5.25. The LVIA concludes that the proposed development would result in a temporary local moderate adverse impact on character area GO1. This is reflective of the reasoned medium magnitude of change for a high sensitivity landscape receptor (Section 5.14). In making this assessment, the LVIA notes that the construction works would occur in the lower section of the site where there are buildings and thus, is of a different character to the wider rural landscape further west. It further notes that the site where construction would occur is already a partially developed landscape. There is some level of disagreement with regards to this assessment as the area where construction is likely to occur within GO1 is more open than other areas and could therefore be more impacted. Notwithstanding this, HDA in their conclusion, agree that the impact would be a moderate adverse significance of effect.

8.5.26. The LVIA concludes that the proposed development would result in a temporary local moderate adverse impact on character area MP1, over the area containing Ridge Farm, which would reduce to a temporary Minor adverse significance of effect outside of this area. In their review, HDA agree with this conclusion. This area of the site consists of the redevelopment of Ridge Farm (proposed maintenance compound), as well as construction works associated with the proposed dog school, accommodation block and the sports building extension. In making this assessment, it was noted that due to the developed nature of the area, re-development of the type proposed would not be completely out of place.

8.5.27. The LVIA concludes that the proposed development would result in a medium magnitude of impact and a temporary Moderate adverse significance of effect on the Mount Browne Townscape Character Area. HDA in their review, agree with this conclusion noting that the site is an already developed area of townscape and the conclusion is reasonable given the more wooded and enclosed nature of the upper part of the site.

8.5.28. It was concluded in the LVIA that the impact from construction activities on the SHNL would be a local medium magnitude of impact and a local, but temporary, Moderate adverse significance of effect upon the lower and upper part of the application site. As with the assessment of character area GO1, which falls within the SHNL, the effects would be higher.

8.5.29. The AONB Planning Advisor in their consideration of the application did not raise concerns around the landscape impact of the development, but did raise concerns about the design of the multi-storey car park and insufficient landscaping to soften the visual appearance of the dog school, accommodation block and extension to the sports facility. These matters relate to the visual impact of the development and do not extend to the landscape impact, either during construction or operation.

- *Operational*

8.5.30. The LVIA concludes that the proposed development would result in a small magnitude of

change resulting in a moderate adverse significance of effect on landscape character area GO1 at winter Year 1 and Year 15. This was largely attributed to the change at the lower section of the site, with the proposed development resulting in a locally adverse effect upon a small and contained part of the landscape.

- 8.5.31. It was noted in the LVIA (section 5.40) that the re-development of Ridge Farm would result in some local beneficial landscape effects as it would include the removal of two existing single storey buildings, to be replaced by a single storey dutch barn as well as the consolidation of hardstanding and additional landscaping. Notwithstanding this, there would still be partial visibility of the accommodation block with the existing vegetation along the southern boundary not fully screening this building. It was therefore reasoned that the beneficial landscape effect would largely balance any adverse effects resulting from the proposed development. The LVIA concludes that the potential effects upon this landscape character area are assessed as local negligible magnitude of impact and overall neutral significance of effect at winter Year 1 and Year 15. It should be noted that the proposed landscaping for the development has been amended since the LVIA was submitted, with additional planting proposed along the PRoW running along the south of the site. This landscaping would further soften the appearance of the accommodation block further.
- 8.5.32. In terms of impact on the Mount Browne townscape character area, the re-development of the site would result in slight beneficial effects. The LVIA therefore concludes that the magnitude of impact is assessed as Small and the overall significance of effect as Minor beneficial at both winter Year 1 and Year 15.
- 8.5.33. The LVIA has identified some adverse effects on the SHNL, largely associated with the lower section of the site. It was noted that these adverse effects would be partly balanced by beneficial effects elsewhere (upper section of the site). It was reasoned that the development would create a more co-ordinated and consistent suite of buildings, improve the amenity landscape within this part of the site and reinstate an area of ancient woodland currently used for car parking. As such, it was concluded that the potential effects upon the SHNL would be minor adverse at both Year 1 and Year 15.
- *Night-time Effects*
- 8.5.34. The proposed development would result in an increase in the number of light sources, through the addition of lighting from additional buildings and vehicles. This would result in an intensification of lighting within the GO1. Taking into consideration the baseline set within the LVIA, it was concluded that the proposed development would represent a moderate alteration to the baseline night-time landscape, resulting in a medium magnitude of impact and a Moderate adverse significance of effect.
- 8.5.35. The LVIA concludes that the development would result in some localised change to the night-time setting of the MP1 character area, which would equate to a negligible magnitude of impact and a Minor adverse significance of effect due to the high sensitivity of the landscape receptor.
- 8.5.36. Similar to the above, there would be an intensification of lighting within the Mount Browne character area. This would represent a minor alteration to night-time landscape character and overall, there would be a Minor adverse significance of effect.
- 8.5.37. The proposed development would result in new lighting within the Valley Bottom area

associated with the new dog school, accommodation block and extended sports building. There would also be additional lighting in the upper section of the site, resulting in an overall intensification of lighting over the site. The LVIA notes that light spill would be minimised by the focused nature of lighting and use of shield. It was concluded that the proposed development would result in a medium magnitude of impact and a Moderate adverse significance of night-time effect upon the night-time landscape of the SHNL.

- *Overall landscape impact*

8.5.38. Based on both the LVIA and review undertaken by HDA it is concluded that the proposed development would result in a Moderate Adverse significance of effect during construction on the Mount Browne townscape character area and on the GO1 and HP1, as well as upon the SHNL. During operation, Moderate Adverse significance of effect would remain in area GO1 and the SHNL, as well as at night-time.

8.5.39. While the LVIA does not identify any significant adverse effect on the landscape character areas and SHNL, even a moderate adverse effect should be treated as harm. Any identified harm to the SHNL is given great weight in the planning balance which will be assessed below.

8.5.40. Visual Impact

8.5.41. The LVIA has tested 24 representative viewpoints which are within 3km of the application site, based on the ZTV. These viewpoints are considered to be representative of a range of views from key visual receptors within the study area. Additional consideration was had to users of the PRow and access land, people at work and dynamic receptors (occupants of vehicles), as well as night-time views.

- *Construction*

8.5.42. The LVIA concludes that potential effects on representative viewpoint 6 (public footpath along southern application site boundary) would be temporary major adverse significance of effect due to the proximity to the valley bottom development, particularly the dog school accommodation and backdrop against an open landscape. Temporary effects upon the views from representative viewpoints 11 (A3100 Roadside Footpath at entrance to the Park and Ride) and 12 (minor road leading to Rushy Platts Farm and The Old Dairy Farm) are assessed as moderate adverse due to the availability of views to tower crane(s), although partially screened by existing vegetation. The remaining viewpoints were assessed as having minor adverse significance of effect due to views to the tower crane(s).

8.5.43. Due to the visually contained nature of the top half of the application site with extensive woodland and vegetation, views of construction would be limited with the tower crane(s) likely to be the most visible component. There may be views of the demolition of the main reception/administration building but this would be restricted with views filtered through the vegetation. The top 2m of the proposed main building would be visible during construction, but when clad in the proposed darker recessive materials, it would blend into the landscape.

8.5.44. Notwithstanding the above, viewpoint 6 does not represent the full scale of effect on users of the public footpath, noting that these views extend for a significant length of the southern side of the site. For users of the footpath travelling west towards Littleton, the valley bottom

development would be visible within near distant views. Existing vegetation would filter views, but the development would remain visible. The LVIA concludes that the impact would be a substantial adverse significance of effect, which is agreed by HDA.

8.5.45. Temporary moderate adverse effect significance of effect were identified for members of the Surrey Police working from the site, and minor adverse for users of the A3100.

8.5.46. All other potential temporary effects upon views for users of the PRow network were assessed as minor adverse significance of effect or less.

- *Operational*

8.5.47. Users of representative viewpoint 6 were assessed as having the greatest permanent impact on upon views from the representative viewpoints, attributed to the open landscape and proximity of buildings and development to the PRow. The proposed valley bottom buildings would partially obscure views of the landscape, which would not be lessened through landscaping. The buildings on the upper parts of the site would not be highly visible and when clad, would blend into the landscape. The LVIA therefore concludes that the impact would be moderate adverse. Moderate adverse effects would continue along the PRow.

8.5.48. The AONB Planning Advisor in their review also highlighted concerns with views from this PRow, but retracted these concerns after consideration of the additional planting proposed to soften the buildings.

8.5.49. Permanent effects upon all other views from the representative viewpoints are assessed as Minor adverse significance of effect or less.

- *Night-time effects*

8.5.50. The LVIA concludes that there would be a moderate adverse significance of effect upon views from viewpoint 6, attributed to the additional lighting within the valley bottom works. All other views were assessed as having a minor or negligible adverse significance of effect. HDA in their review, did not disagree with these assessments.

8.5.51. *Design*

8.5.52. In general, the proposals reflect the design context by maintaining and rationalising built form within the upper plateau (The Campus Heart), retaining and strengthening the wooded escarpment (The Woodland Belt); and limiting development within the lower part of the site (Valley Bottom) to a former bowling green, storage area, car park and prefabricated building. The proposed architecture has a relatively simple vernacular with a colour palette and materials designed to complement existing buildings and the wider rural landscape.

- *The Campus Heart*

8.5.53. The Campus Heart will be welcoming and legible. The entrance to the new main head quarters (HQ) building will be clearly visible from the main drive and car parks. It will be articulated through signage, render, glazing and a portico with brick piers. The HQ building will be connected to the old house and existing courtyard wing forming a central operational

hub with a secondary access for staff. East of the HQ building the existing Service Building is retained. The HQ, Courtyard and Service Building will be grouped around a unifying central quadrangle with a fingerprint motif providing the design inspiration. The retained historic garden wall and folly on the eastern side of the space and a colonnade around the main HQ building will guide visitors into this welcoming space with areas of lawn, terraced seating and hardstanding for ease of access and to support a range of activities. A loop road and drop off bays will bring visitors to the front of the HQ building with visitor parking to the western side of the building. Cycle parking would be visibly located adjacent to the loop road and visitor car park. To the south, the existing memorial garden and lawn area at the rear of the old house will remain largely unchanged.

8.5.54. The proposals respond positively to design discussion and comments during the pre-application process. Whilst the general architectural approach and height of the new HQ building was broadly agreed there was discussion around how plant would be accommodated and screened. The proposed plant would be enclosed by a metal louvred screen. The enclosure would be no higher than the stair lift pop-up, which will have rendered walls in keeping with the design of the building. The roof will also incorporate a saw tooth roof feature with glazing, PV panels and rendered walls. The entire roof area will be contained by a parapet with stone capping. There was discussion around the need for an external fire escape route to the HQ building. The application scheme has reconfigured the building to internalise the fire escape route, which improves the appearance and circulation around the building.

- *The Woodland Belt*

8.5.55. The Woodland Belt comprises the new Munstead Building contact centre on the site of the existing dog school; Ancillary Building for changing and storage on the Site of two Munstead Houses, which are currently used as offices; A decked car park and ancillary stores. The two storey Munstead Building would nestle within an area of woodland, which will provide a calm setting for emergency call handlers. The building would have a solid brick base with upper floor timber cladding, louvres and glazing, with outdoor amenity space forming a strong relationship between the internal and external environments. The decked park, ancillary building and ancillary stores are functional buildings. Façade treatments have been designed to reflect the campus vernacular and break the overall massing. The appearance of these buildings would be softened by existing mature trees and woodland.

8.5.56. The proposals consider pre-application feedback and design discussion. The existing and new woodland planting shall retain the existing treed character of this part of the site. Consideration was also given to the height and appearance of the decked car park. The submitted sections demonstrate that the building would nestle into the landscape, below the tree line and other proposed and existing buildings within the site. The elevational treatment would break up the massing and conceal the structure and cars within the perimeter crash barriers. Further articulation and screening are provided by a series of vertical fins arranged on the south and west elevations with existing woodland providing screening to the north and east.

- *The Valley Bottom*

8.5.57. The Valley Bottom would comprise a grouping of buildings, which would have a rural vernacular. The existing re-clad sports building and the new dog school and dog school

accommodation building would be grouped around a parking courtyard. Kennels would sit behind the dog school on the site of the former bowling green, away from the footpath on the site's boundary. The materials palette is inspired by traditional timber barns with black timber cladding over a red brick base. Porticos clearly articulate the entrances to the dog school and accommodation block. Landscaping would be enhanced with native planting to the site's boundaries and new tree planting. Boundary features would also be sympathetic to the rural environment. The new access road and tree lined avenue would form a clear gateway and entrance to the site, with rough grassland and boundary hedging in keeping with the rural environment.

8.5.58. Mitigation measures recommended by HDA

8.5.59. The main concern highlighted by HDA were with respect to both the landscape and visual impacts associated with the valley bottom development, owing to the open and rural character of the area and quantum of development proposed. It was acknowledged by the Applicant that:

8.5.60. 'The LVIAs identify that both proposals (for the main site and access road) will result in effects on the landscape in the short and long term. The LVIAs identify that both proposals will result in impacts on the Surrey Hills National Landscape at a local level; the greatest impact will be in the area which will include the relocated dog school and accommodation building and the length of proposed access road across an area of agricultural land to meet the Artington roundabout. Both of these elements will have a permanent impact through the introduction of a quantum of new buildings and associated infrastructure into this area of the site'

8.5.61. It is therefore accepted that the proposal would result in harm to the landscape. HDA therefore considered that the following measures should be requested through conditions:

- a. Preparation of a Construction Environmental Management Plan (CEMP) to regulate the location, size and duration of a construction compound (or multiple compounds) to ensure that potential landscape and visual effects arising from the construction period are adequately mitigated.
- b. Prior to the completion of the proposed multi-storey car park, a landscape strategy should be prepared to minimise the visual effects of the existing unregularized car parking located on the western site boundary (which encroaches into the Green Belt) upon the users of the adjacent Footpath 277. The strategy should either remove this area of parking (it is anticipated that spaces lost from this area could be accommodated within the new multi-storey car park) or reduce its area so that appropriate screen planting can be introduced along this boundary.
- c. A detailed landscape strategy should be prepared, particularly for the area around the Dog School Accommodation to ensure that visual effects on users of the adjacent Footpath 276 are adequately mitigated.

8.5.62. It is not accepted that (b) should be requested as the referenced car parking area is existing and would remain unchanged as part of this application. The Applicant was made aware of these concerns through the pre-application process but no changes were proposed within the application. Notwithstanding this, it would not be reasonable to request this. The other recommended conditions would be reasonable and would serve to partially mitigate the identified landscape and visual harm.

8.5.63. Conclusion on landscape and visual impact

8.5.64. It is considered that the current mitigation measures as proposed for the development would be sufficient to reduce the potential landscape effect and visual effects to a level that would not be considered to be significant by year 15. The development is considered to respond positively to the landscape character of the area, with the identified materiality enabling the buildings within the Woodland Belt and Campus Heart to integrate into the landscape. The proposed landscaping, design and materiality of the valley bottom would reduce the harm on the visual and landscape character of the area to a level that is not significant.

8.5.65. Notwithstanding this, the proposal would result in a moderate level of harm to the landscape, including the SHNL, particularly at night-time. This harm will be balanced against the potential benefits of the scheme below.

8.5.66. Major development in the Surrey Hills National Landscape

8.5.67. 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.

8.5.68. The proposed development would predominantly consist of the redevelopment of the existing Mount Browne site which are inset from the Green Belt. The exception being the works within the valley bottom (dog school, dog school accommodation, extension to the sports building and maintenance compound). In isolation these works are unlikely to be considered as major development which was a conclusion shared by the AONB Planning Advisor. However, when the cumulative scale and impact of both this development and the access road are considered, they would amount to major development within 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:

- a) 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;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

8.5.69. The Applicant has addressed these points within the Supplementary Planning Note dated August 2024, which should be read alongside the needs statement prepared by the Police.

8.5.70. *Need*

- *Dog school*

8.5.71. The Surrey Police already operate an internationally renowned dog school which is located on the Mount Browne campus within the central area of the site. The dog school has planning permission, although this was issued in 2000. The facilities are therefore dated and need to be fit for purpose to meet the needs of the Surrey Police and to maintain the high standard that is recognised internationally.

8.5.72. It has been set out in the Planning Statement and the needs statement that the dogs and the associated dog school where they are trained are a vital part of Surrey Police's operations and are deployed daily and keep the public and Surrey Police officer's safe from knife and firearm threats. The Police's firearm support dogs and teams offer 24/7 cover, 365 days a year. The dog unit also provides training for all joint force dogs including those used at Gatwick airport and supports in areas such as digital protection, drugs, counter terror and victim protection.

8.5.73. Operationally the location of the new dog school needs to be in a secure position. Furthermore, Surrey Police require the dog unit to be located adjacent to, or in very close proximity to other key training facilities and other Surrey Police commands to ensure that the dog training is undertaken alongside other training such as taser training and public safety training. This approach ensures multiple specialised disciplines can train together in a safe and controlled environment which is not directly adjacent to residential properties.

8.5.74. The Police have undertaken a search for alternative sites within the Guildford Borough (or close to the boundary) which could locate the dog school facilities. Regard was had to the hierarchy of sites within non-Green Belt and SHNL sites being preferred, followed by brown-field Green Belt sites. Guildford Borough is heavily constrained with circa 89% Green Belt and large areas of SHNL. The alternatives search set out that no other identified sites could be found outside of these sensitive areas which would also be located away from heavily populated areas to avoid amenity impacts. The principle of the use of the site for the Police is also already established and part of the site is already used for dog training.

8.5.75. The need for the dog school, dog school accommodation and associated training facilities therefore have a clear need to be located on the site to ensure these services are retained and continue to operate at a high standard to benefit the community.

- *Operational and functional need for the development*

8.5.76. The key purpose of the proposed development is to secure the future of the Surrey Police Headquarters at the Mount Browne site to ensure they 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.

- *The cost of, and scope of for, developing outside the designated area*

8.5.77. A search has been undertaken of alternative sites within Guildford Borough (or close to the boundary) for alternative sites which were outside town centre locations which could locate a dog school, accommodation, supporting training units and supporting secure land for dog training. The sites needed to be achievable, deliverable and acceptable. The area

around the Mount Browne and within Guildford Borough is extremely constrained with approximately 80% of Guildford Borough within the Green Belt and over 70% of the wider Surrey region in the Green Belt. Consequently, there are no other opportunities within the Borough to deliver a headquarters development which would not affect other areas with planning or landscape constraints. By redeveloping the existing site, it provides the opportunity to re-use existing buildings already in occupation for operational police purposes and therefore has a long-established existing use thus limiting the net impact on the AONB in addition to other constraints such as Green Belt.

- 8.5.78. If the proposal cannot be delivered, there would be a significant impact on the Police's operational abilities as it would constrain future growth through inability to deliver operational requirements.
- 8.5.79. Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated:
- 8.5.80. The assessment of the landscape and visual impacts of the proposed development was assessed above and it was determined that there would not be a significant impact. It is therefore considered that the proposed development would appropriately mitigate and moderate to avoid any detrimental effect on the environment and landscape.
- 8.5.81. The application site is a private site with limited recreational facilities. Free access would be retained to the PRowWs that surround the site, enabling recreational use.

- *Conclusion*

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

8.6. Access, highway safety and capacity

- 8.6.1. 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".
- 8.6.2. 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.
- 8.6.3. 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.
- 8.6.4. Policy ID10 of the LPSS sets out the parking standards for New Development, which sits alongside the Parking Standards for New Development SPD.

- 8.6.5. 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.
- 8.6.6. Access and internal road layout
- 8.6.7. 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 being 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 Land 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. The proposed access road that forms part of a separate application has not been considered here but it should be noted that the transport assessment is a combined document that considers both applications.
- 8.6.8. The existing internal roads and pedestrian routes would be largely maintained as part of the proposed development. The exception being for the changes discussed below.
- 8.6.9. The sports field access referred to above is proposed to be widened to 5.1m to allow vehicles waiting to enter the sports field room to give way to exiting vehicles. The widened access would also allow emergency vehicle access. The new widened width would extend onto the new dog school to allow larger vehicles to turn and exit. No concerns are raised with the widened road, noting that it would improve vehicle safety and provide improved access to emergency vehicles.
- 8.6.10. A new road is proposed to connect Munstead View and The Drive. The road would have a length of circa 80m with a width of 4m to accommodate large vehicles associated with refuse collection and deliveries. The road would operate as a one-way with 13 echelon parking bays, including six disabled bays. The one-way system would provide additional internal connectivity within an area of previously developed land. No concerns are raised with the new internal road, and none were raised by the County Highway Authority (CHA).
- 8.6.11. The proposal includes the construction of a new multi-storey decked car park with adjacent external car parking. The transport assessment states that existing access routes would be utilised and widened to 5m to ensure two-way flows are possible. The decked car park would be accessed from the north, whilst the existing access road to the east would be retained for use by emergency access.
- 8.6.12. The CHA has raised no objection to the proposed changes to the internal road layout.
- 8.6.13. Highway safety and capacity
- 8.6.14. The transport assessment has undertaken a detailed assessment of traffic generation which included utilising Automatic Travel Counts (ATC) surveys on each of the existing vehicle accesses to Mount Browne for a seven-day period commencing 4th July 2023. As the site is operational, these surveys would have captured existing staff commuting,

visitors and servicing trips, as well as any operational vehicles currently based at the site.

8.6.15. The transport assessment notes the following 5-day average peak hour trip generation:

Period	In	Out	2-Way
AM (07:30 – 08:30)	115	26	141
PM (16:30 – 17:30)	23	131	154

8.6.16. Based on the data collected it was noted that 40% of vehicle trips were to/from Munstead View (via The Ridges), 14% from the Sports Field (via The Ridges) and 46% from The Drive (via Sandy Lane).

8.6.17. The trip generation from ancillary vehicle trips is not expected to change as a result of the proposed development.

8.6.18. The transport assessment sets out the proposed staff vehicle trip generation as follows:

Period	In	Out	2-Way
AM (07:30 – 08:30)	212	47	259
PM (16:30 – 17:30)	43	232	275

8.6.19. It is understood that this data is based on the number of workstations as well as the shift patterns of workers at the site, inclusive of office hours and shift work (early, late and night shift). Overall, 972 staff workstations would be provided at the site, with the site used 24 hours a day. The existing site is currently used 24 hours a day, which would be unchanged as part of the proposed development.

8.6.20. In terms of operational vehicle trip generation, the proposed development would result in an increase of 197 operational vehicles being based at the site. Through application of the daily trip distribution profile shown in figure 7.2 of the transport assessment, the anticipated daily operational vehicle trips would be as follows:

Period	In	Out	2-Way
AM (07:30 – 08:30)	10	19	29
PM (16:30 – 17:30)	26	34	60

8.6.21. The total increase in trip generation would therefore be:

Period	In	Out	2-Way
AM (07:30 – 08:30)	+ 107	+ 40	+ 147
PM (16:30 – 17:30)	+ 46	+ 135	+ 181

8.6.22. The development would result in an uplift in non-vehicle trips on the local transport network, but the impact of this was considered to be non-material, as set out in section 7.7 of the transport assessment. In making this conclusion, consideration has been had to the proposed measures to reduce the number of single occupancy vehicle trips set out in the interim travel plan. These measures will be discussed further below.

8.6.23. The transport assessment makes the following comments with respect to capacity of the

surrounding transport network.

- 8.6.24. The proposed development would result in reduced vehicle movements along Sandy Lane and The Ridges through removal of police traffic from these roads resulting in capacity improvements at the respective junctions with the A3100. This is a key benefit to the proposed scheme, although it should be noted that this is intrinsically linked with the access road application. To secure this benefit, a condition is recommended requiring vehicular access to Sandy Lane and The Ridges be used for emergency vehicles responding to emergencies on site only. In addition to this, a condition is recommended requiring the installation of droppable bollards at the entrance to Sandy Lane to provide a physical barrier for vehicles trying to use this access. A similar condition has been recommended for the access road application for The Ridges entranceway.
- 8.6.25. The Artington Roundabout would have ample residual capacity to absorb the additional vehicle movements from the proposed development and would not result in a significant detrimental impact on the performance of the roundabout.
- 8.6.26. The proposed development would see a reduction to the residual capacities to the junction with both the Broadford Road and New Pond Road roundabouts. The reduction of 2-3% would mean both junctions would still operate within their residual capacities.
- 8.6.27. It should be noted that the NPPF requires the impact on the road network to be severe. It was concluded in the transport assessment that while the proposed development would result in a reduced residual capacity at the Broadford Road and New Pond Road junctions, the impact would not be severe.
- 8.6.28. The Surrey County Council modelling team undertook a review of the traffic modelling undertaken by the Applicant and note that the proposal would lead to an increase in vehicle trips to/from the site when compared to the existing. The proposed new access, which forms part of a separate application, would remove traffic from The Ridges and Sandy Lane route. A regular, free shuttle bus service between Mount Browne and Guildford Station will be provided, which aligns with staff shift patterns. The shuttle bus would operate four services per hour (in both directions) between Mount Browne and the George Abbot car park between 07:00 – 09:00 and 16:00 and 18:00. A lunch time service between 12:00 and 13:00 would also operate on Wednesdays, Thursdays and Fridays. Further mitigation measures will be provided to encourage modal shift – more details of this can be seen below. The CHA in their consideration of the application advised that the increase in trip generation would be substantial and if this were to be channelled through the existing access points (The Ridges and Sandy Lane) that the impact on highway safety and capacity would be unacceptable. The proposed access road, while forming part of a separate application, would provide the mitigation necessary to overcome this objection. On this basis, it would be necessary for the access road to be implemented first.
- 8.6.29. To ensure this, a condition requiring the submission of a Construction Transport Management Plan which includes details on how construction traffic would be managed, how the access road would be constructed for the purposes of construction during the build period and programme for completing the access road. This combined with the proposed phasing plan would ensure that the LPA and CHA have adequate control over when development comes forward and to manage construction impacts.
- 8.6.30. Sustainable transport

- 8.6.31. The application site is located within a sustainable location, being within a 30 minute walk from the Guildford Town Centre, access to public bus routes as well as being within walking distance from the Artington Road Park & Ride. There is a shared footway/cycleway at the Artington Road roundabout that merges into an advisory cycle land that continues northbound on the A3100 towards the Guildford Town Centre. Bicycle facilities on site are limited. A interim travel plan has been prepared to support the development (revision 02, dated 29 July 2024), which was subject to amendments as requested by the CHA. This sets out a strategy to facilitate and encourage travel by walking, cycling and public transport. The travel plan has been prepared in accordance with SCC's Travel Plan Guidance and would help ensure there are opportunities for sustainable travel.
- 8.6.32. Active Travel England in their consultation response determined that standing advice should be issued and would encourage the local planning authority to consider this as part of its assessment of the application.
- 8.6.33. The travel plan outlines the following proposed measures and initiatives that are proposed to encourage the uptake of sustainable travel amongst staff and visitors:
- Regular shuttle bus service for staff between Mount Browne and Guildford Rail Station during peak periods.
 - A total of 84 cycle parking spaces within secure and sheltered stores. These would be located in close proximity to the proposed ancillary building as well as close to the main building/reception and adjacent to the dog school.
 - 20% of cycle parking spaces would be provided with a plug socket to allow for e-bike charging.
 - The proposed ancillary building would contain seven smart/unisex showers (including one disabled shower), changing rooms and a dedicated room for drying clothes. A minimum of one storage locker per cycle parking space would be provided.
 - Consideration given to dedicating several priority parking spaces for staff signed up to Surrey Police's car sharing database. These spaces would be located within the main building car parking.
 - A Staff Induction Pack would be provided to all staff members which would include details of the Surrey Police's Parking Policy, details on facilities offered, including timetables and location, relevant discounts offered to Police Offer.
 - To encourage walking the following is proposed; staff would be provided with information detailing the benefits of walking, pedestrian routes would be clearly sign posted, promotion of walking applications, clear wayfinding built into the proposed development.
 - To encourage cycling the following is proposed; cycle training for staff, promotion of facilities, display of maps of local cycle network, promotion of journey planning tools, implementation of cycle sacrifice scheme and 10% staff discount for any instore purchases at Halfords.
 - To encourage public transport use the following exists to staff: free bus travel for Police Officers and PCSOs in Surrey, free transport for London services for Surrey Police Officers who show their warrant card, discounted travel on Arriva buses.
- 8.6.34. In addition to the existing and proposed measures, the travel plan outlines a number of potential options that the Police may explore but do not form part of the proposals at this time.

- 8.6.35. EV vehicle charging points would be provided for 50% of new parking spaces, with 2 of the available parking spaces to be provided with a rapid charge electric vehicle charging point.
- 8.6.36. The CHA have reviewed the travel plan, along with other supporting documentation and subject to the imposition of the recommended conditions, did not raise an objection to the proposed sustainable transport measures. It should be further added that the proposal would include off-site highway improvement works which include the provision of a cycle lane on Old Portsmouth Road and the site access will feature a pedestrian and cycle route leading to/from the police buildings.
- 8.6.37. It is also considered that the proposed development accords with the Active Travel England standing advice,
- 8.6.38. The proposed measures outlined above would ensure that the proposed development would deliver an integrated, accessible and safe transport system, which maximises the use of sustainable transport modes, in compliance with Policy ID3 of the LPSS and the LTP4.

Parking provision

- 8.6.39. The application site is located outside of the Town Centre Boundary as set out on the Policies Map of the LPSS and 'suburban' areas are defined as areas outside the town centre. This site is therefore, 'suburban' for the purposes of the parking requirements.
- 8.6.40. The transport assessment notes that a total of 655 vehicles were recorded parking on the site at the time of their parking survey, with 534 of these within formal marked bays. The remaining vehicles were parked informally on gravel parking areas, on grass verges and under trees. The transport assessment includes an existing car parking plan that shows these areas. The site has a total of five dedicated disabled bays, four of which are located within the main reception car parking and one adjacent to the Old House. There are six existing EV charging bays.
- 8.6.41. Cycle parking on the site is limited with only 10 spaces provided within an existing store.
- 8.6.42. A key focus of the proposed development was to consolidate and formalise existing car parking and remove parking from sensitive areas, including under trees (some of which are within the ancient woodland) and on grass verges. Parking along Munstead View would also be removed to allow for two-way vehicle flows.
- 8.6.43. The proposed development would deliver a total of 834 formal car parking spaces including 22 visitor and 31 disabled spaces over the site. This would be an uplift of 303 formal spaces. The additional car parking is required for the core operational and functional needs of the Surrey Police, but also to provide parking facilities for staff and officers working unsociable shift patterns when public transport is not available. The car parking is therefore required to ensure the Surrey Police can continue to fulfil their civil responsibilities. The spread of these spaces is shown on the proposed masterplan and detailed within the transport assessment. Of note, 290 spaces would be provided within the proposed multi-storey car park, 115 to be retained at the western side of the site, 43 between the dog school and dog school accommodation, 143 to the east of the sports building (84 in an overflow area of grasscrete) and the remainder around the buildings at the top half of the

site. All parking spaces would be designed to comply with the minimum dimensions set out in Policy ID10 of the LPDMP.

8.6.44. The use of the site would remain unchanged and would have a 'sui generis' land use. Under both the Parking Standards for New Development SPD and SCC's 'Vehicular, Cycle & Electric Vehicle Parking Guidance for New Development 2023' the parking requirements would be subject to an individual assessment. While the proposal would result in an uplift of 303 formal car parking spaces, the scheme would offer a number of sustainable travel measures as outlined above. It is therefore considered that the proposed parking provision reaches an appropriate balance for a site within the Guildford suburban area. The CHA has reviewed the proposed parking provision and did not raise an objection, subject to the recommended conditions.

8.6.45. The proposed development would deliver 84 cycle parking spaces within secure and sheltered stores, in line with the minimum requirements of SCC's minimum cycle parking standards. The Parking Standards for New Development SPD requires an individual assessment with respect to cycle parking. In this regard, the CHA raises no objection to the proposed number, layout and design of the proposed cycle storage.

8.6.46. Off-site Highway Improvement Works

8.6.47. In terms of the improvements to the wider highway network it is noted that the CHA has requested the provision of a formal crossing on one of the arms of the Artington roundabout and the provision of a cycle lane along Old Portsmouth Road. These would be secured via a S278 agreement, which is set out in a condition recommended by the CHA.

8.6.48. Conclusion on access, highway safety and capacity

8.6.49. Overall, it is considered that the proposal would not have an unacceptable harmful impact on highway safety and capacity in the area and considering the comments received from the CHA the proposal is deemed to be acceptable in this regard. The proposed development would comply with Policy ID3 of the LPSS, Policy ID10 of the LPDMP and the NPPF. The scheme would deliver improved facilities for parking and cycle and promote sustainable forms of transportation. Accordingly, there would not be a severe impact on highway safety, or the residual cumulative impacts on the road network.

8.7. Flooding and drainage

8.7.1. 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.

8.7.2. Flooding

8.7.3. 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. The maps do indicate that there three isolated areas across the site which have a low risk of water flooding and present flood depths up to 900mm. These are localised areas and are anticipated to reflect depressions in the site. The Guildford Borough Council Surface Water Management Plan does not show the site as being located within a surface water flooding hotspot location.

8.7.4. 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 'highly 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.

8.7.5. 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 addition, it is noted that a sequential test is not triggered for sites which are allocated in an adopted local plan. 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.

8.7.6. 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.

8.7.7. Drainage

8.7.8. The proposed development would lead to an increase in impermeable surfaces from roofs and hardstanding. Any increase in impermeable area 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.

8.7.9. The application is supported by an Outline Drainage Strategy for phase 1 (ODS1) of the development. The strategy notes that a combined document will be prepared for sections 2 and 3 of the development. For the purposes of the proposed phasing phase 1 includes the new access road which forms part of a separate application and the valley bottom area. 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.

8.7.10. The ODS1 recognises that surface water must be restricted to no greater than Greenfield rates in line with the NPPF and Policy P4 of the LPSS and Policy P11 of the LPDMP. The Greenfield rates have been calculated and are contained within the ODS1.

- 8.7.11. 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.
- 8.7.12. Surface water will be collected via below ground surface water drainage systems, including permeable paving, linear channel drains, swales and gullies with the ground levels cambered and sloping away from the buildings.
- 8.7.13. Foul water would drain via a new below ground gravity pipe network before discharging into the existing on-site foul drainage. The proposed plans show the proposed design and layout of the new foul water drain. It is understood that the drainage system would be designed to account for the additional foul flow rate. Foul waste from the dog school would separate and discharge into a septic tank unit.
- 8.7.14. The maintenance requirements associated with the proposed drainage network are set out in Table 8 of the ODS1.
- 8.7.15. The ODS1 makes the following conclusions with respect to the proposed drainage network for phase 1:
- The surface water network for the buildings, 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.
 - Isolated new drainage networks will be provided for the new buildings and external areas before discharging into the surrounding existing networks and ultimately to the nearest public sewer.
 - Drainage network will be provided for the proposed access road which will be attenuated before being pumped into the surrounding drainage ditches at 1.1l/s.
 - Drainage network will be provided for the proposed buildings and external works which will be attenuated before discharging via gravity-based system connecting to the existing foul drainage network located on site.
 - The permeable paving will be used to treat against any contaminants picked up within surface water runoff from the roof, access roads, car parks and footway drainage. This in conjunction with trapped gulleys, catchpits and basins are designed to provide an adequate level of surface water treatment before discharging to public sewer.
 - Foul water will indirectly outfall into the public sewer to the east of the site via the existing foul network on site.
- 8.7.16. 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 for each phase to include points (a) - (h) of the LLFA's consultation response, as well as the submission of a verification report for each phase prior to occupation.

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

8.8. Air quality

8.8.1. 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 para 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.

8.8.2. The deterioration of air quality is intrinsically linked to the use of fossil fuels and therefore traffic movements from exhaust emissions. Policy P9 takes forward the essential need for new development to avoid creating, or contributing to, poor air quality levels both within and outside the Borough boundary.

8.8.3. The Air Quality Assessment submitted in support of the proposed development considered only the impacts on air quality during the construction stage. The AQA submitted with the access road application (24/P/00563) considered the impact during the operational stage (emissions from vehicles and energy plant). As it is considered more appropriate to consider the operational impact for this application, the access road AQA is referred to address this. The reports have been prepared in accordance with the Air quality Management guidance.

8.8.4. The main site AQA makes the following conclusions with regard to the impact during the construction stage:

- The overall dust risk from the site is predicted to be medium in relation to all activities. The risk for health effects is predicted to be low for all activities. The dust risk for ecological impacts is predicted to be medium for all activities.
- All activities have the potential to give rise to disamenity dust and health effects.
- Appropriate mitigation measures will help to negate most of the potential negative air quality impacts resulting from the construction phase of the proposed development and will avoid significant dust effects.
- With the implementation of a Construction Environmental Management Plan (CEMP), in combination with the measures set out under Section 7 of the AQA, the construction and demolition stage dust effects in the study area would be temporary and not significant.

8.8.5. 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 that the application be recommended for approval a pre-commencement condition is recommended requiring the submission of a CEMP. No objections were raised in terms of the impacts on air quality during the construction stage.

8.8.6. The access road AQA concludes that the vehicle exhaust emissions associated with the proposed development are not predicted to have a significant effect on human health or ecological receptors given the predicted impacts at the receptors. The EHO in their review of the AQA advised that it had not considered the impact on receptors/hotspots within the

existing Guildford Town Centre Air Quality Management Area (GTCAQMA). In response the Applicant advised that it was not considered necessary for an air quality review of the GTCAQMA as the AQA concluded that the impact of the additional journeys to this area was negligible. The Council's EHO advised that the proposal would result in a large increase in vehicle movements, as set out in the transport assessment. It has not been advised how many of these additional movements or what percentage would be northbound towards the GTCAQMA. Accordingly, the impact cannot be determined. The impact and any necessary mitigation measures will be reported on through the late sheets.

8.9. Impact on residential amenity

8.9.1. Overbearing impact, loss of privacy and overlooking

8.9.2. 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 south of the site which are accessed from The Ridges, as well as those to the north on The Firs and Sandy Lane.

8.9.3. The majority of the proposed construction works are located well away from the boundaries of the site. While some of the new and replacement buildings would be multiple storeys tall, due to their distance to the boundaries, there would be no harm caused to neighbouring properties in terms of overlooking, overbearing or loss of privacy.

8.9.4. It is noted that the proposed multi-storey car park would be located close to the northern boundary of the site which is shared with the College of Law, which is itself is subject to a live planning application for new residential accommodation. Even taking this into account, the boundary treatment between the site consists of thick tree planting and vegetation which means that intervisibility between the sites is very limited. Even if this were not to be the case, the proposed multi-storey car park is also set well off the common boundary and angled away from it, meaning that there would be no adverse impacts in terms of overlooking, overbearing or loss of privacy to either the existing College of Law or the proposed scheme. It is noted that lighting on the top deck of the multi-storey car park, and glare from vehicle headlights will need to be carefully considered and it is felt that this matter could be adequately controlled by condition.

8.9.5. Subject to the imposition of this condition, it is considered that the proposed development would not result in an unacceptable impact on the amenity of adjoining properties.

8.9.6. Noise

8.9.7. In terms of the dog-school it is noted that the current facility is located within the main campus of buildings. The kennels and associated buildings are now ageing and are constructed in a way which does not assist in minimising noise and disturbance from barking etc. The existing kennels have a capacity of 50 dogs, which would be unchanged as part of the proposed new facilities. The proposal would see the dog school being moved to the valley at the southern end of the site, to the west of the Sports Building. It would be approximately 300 metres to the west of the closest residential properties located along The Ridges.

8.9.8. The dog school facilities have a functional need to be grouped together, as well as being in close proximity to other key training facilities to ensure that the dog training is undertaken

alongside other training such as taser training and public safety training. The proposal would bring all the facilities together in a more consolidated and functional way to enable to Police meet their functional requirements. The Police have undertaken a search of alternative locations within Guildford Borough (or close to the boundary) which would support the dog school, accommodation, supporting, training units and supporting secure land for dog training, and were not able to identify any sites outside of the Green Belt or that would meet the needs of the operation.

- 8.9.9. Unlike the existing kennels which are open and set around a square, which means the dogs can see and possibly aggravate each other, the proposed kennels have been purposefully designed to minimise noise and disturbance to the surroundings. Specific design features include an amended orientation so that there would be no direct line of sight between the dogs with the kennels positioned such that the outer kennels look outwards. Internal kennels would look towards a fence, which would obscure views between the dogs. Additionally, a 1.8 metre acoustic fence would be erected around the perimeter of the kennels to provide additional acoustic insulation.
- 8.9.10. The application is supported by a Noise Assessment as well as an addendum cover letter which considers specific concerns raised by the Council's Environmental Health Officer and the case officer. Both documents have been reviewed. It was noted in these documents that predicted noise generated by the dogs would at the nearest sensitive receptor at The Ridges and at Sandy Lane would be no greater than existing. It is understood that these predicted levels allow for the screening effect of a 1.8 metre high close-boarded fence around the external areas of the dog school.
- 8.9.11. It was further noted in the additional information provided that dogs are left to sleep undisturbed from 7pm and the kennels locked to restrict access. Noise during the more sensitive period of the day would therefore be low and would not result in sleep disturbance from surrounding sensitive receptors.
- 8.9.12. With respect to the use of outdoor areas for training, it was advised that there would be no changes to existing training hours or operation. As there would be no increase in the number of dogs, there would be no changes to measured noise levels from sensitive receptors.
- 8.9.13. The proposed development would also involve the construction/installation of plant equipment over the site. Plant would be constructed within ancillary buildings, two to the east of the Service Wing and one to the west of the dog school accommodation. The noise assessment shows that predicted noise from the plant when measured at the nearest sensitive receptors (Sandy Lane and The Ridges) during daytime and night-time would be below existing background levels and result in a negligible impact.
- 8.9.14. Upon review, the Council's Environmental Health Officer did not raise objections to the proposed scheme and did not recommend any conditions.
- 8.9.15. It is therefore considered that the proposed development would not result in an unacceptable adverse effect on sensitive receptors and would not result in any adverse impacts on the amenity of occupiers of properties along Sandy Lane and The Ridges, in compliance with Policies D5 and D11 of the LPDMP.

8.10. Impact on trees and ancient woodland

- 8.10.1. Mount Browne is a heavily wooded site, with many large, mature trees distributed over the site. A substantial area (circa 3.09ha) of Ancient and Semi-Natural Woodland runs along the eastern boundary of the site, and adjoining the wider woodland area that runs wraps around the main developed area of the site (woodland belt). A TPO known as 'Little Artington' (reference P1/201/116, 1975 (No.9) covers a large area of land to the east of the site, overlapping the area of Ancient Woodland. The area of TPO includes several beech, oak, sweet chestnut, horse chestnut, birch and sycamore.
- 8.10.2. The St Catherine's Conservation Area adjoins the site to the north and while it does not extend into the application site, there are trees within the conservation area that encroach into the site boundary.
- 8.10.3. The existing site includes ad hoc car parking, with elements of informal, and form car parking situated within the Ancient Woodland.
- 8.10.4. 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'.
- 8.10.5. 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.
- 8.10.6. 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.
- 8.10.7. 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 28th of November 2022.
- 8.10.8. In addition to the Ancient Woodland, the AIA notes that there are two trees on the site (T136 and T138) that were identified as Veteran trees. The AIA and the Council's Tree Officer note that these can be adequately protected in accordance with Natural England's

and the Forestry Commission's 'standing advice'.

- 8.10.9. The AIA notes that up to 16 trees would likely need to be removed to facilitate the development. These would comprise 1 Category A, 5 Category B, 8 Category C and 2 Category U trees, as well as 1 tree group (Category C). In addition, the removal of a section of G1 (Category B) will be required. No trees are protected by TPO, in the Conservation Area or within the identified Ancient Woodland are proposed to be removed.
- 8.10.10. All trees proposed to be removed are located internally in the site and their removal would not be visually apparent outside the site. While not desirable that Category A and B trees would be removed, the Council's Tree Officer agrees with in this case, their removal would be unavoidable with the proposed scheme. The proposal would 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.
- 8.10.11. The proposal also includes a parking strategy which would discourage vehicles from parking over the roofs of mature trees which currently occurs due to inadequate car parking on site. In addition to providing adequate parking on site, it is also proposed to install physical barriers to prevent unsolicited parking in highly pressures areas or areas of historic informal parking. The Site Wide Landscape Strategy sets out that these could include large boulders, low timber posts or large log sections laid flat. Specific details would be secured via condition to ensure that these sensitive areas do not continue to be used for parking.
- 8.10.12. The Council's Tree Officer raises no objection, and notes that if the proposed site development is to be approved, a condition should be imposed requiring an Arboricultural Method Statement and Finalised Tree Protection Plan to ensure all retained trees are adequately protected.
- 8.10.13. 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.

8.11. Impact on ecology, nature conservation and biodiversity

- 8.11.1. 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.
- 8.11.2. 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.
- 8.11.3. Designated and protected species
- Badgers
- 8.11.4. The submitted EIA identified active badger sets within the proposed development site,

which are expected to be disturbed as a result of the proposed development activities. As the disturbance of setts without appropriate derogation licensing would be contrary to the Protection of Badgers Act 1992, and the above-mentioned policies, the applicant would need to apply to Natural England for a protected species licence. To support this application, an appropriately detailed impact mitigation method statement would be required which will need to address measures to mitigate and compensate for any disturbance. 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. If active setts are found within 30m of the construction zone, the applicant will be required to obtain a badger mitigation licence from Natural England following the receipt of planning permission and prior to any works which may affect badgers or their setts commencement. A condition is therefore recommended that requires the completion of the before mentioned badger survey. 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.

- Bats

8.11.5. The EIA confirmed the presence of active bat roost within the Old House. However, the report states that "B1 (Old House) is to be internally refurbished only, with no works to take place to either the roof or the loft space. Given this, at this time, no licence would be needed to undertake the works." In response, the SWT recommend that a precautionary approach to works to the building be taken. A condition has been recommended requiring the precautionary works on the Old House to be included within a Construction Environmental Management Plan (CEMP).

8.11.6. 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 trees T26 and T28 be felled using a precautionary approach.

8.11.7. To ensure bats are not impacted by external lighting, the SWT recommend that a condition be imposed requiring the submission of a Sensitive Light Management Plan which should include a plan showing levels of illumination in Lux.

- Breeding birds

8.11.8. The SWT recommend that development activities such as demolition and vegetation or site clearance be timed to avoid the breeding bird season of early March to August inclusive. It was further noted that if this is not possible and no large areas of dense vegetation are affected, the site could be inspected for active nests by an ecologist within 24 hours of any clearance works. If any active nests are found they should be left undisturbed with a buffer zone around them, until it can be confirmed by an ecologist that the nest is no longer in use.

- Hazel Dormouse

8.11.9. The EIA identifies the likely absence of hazel dormouse from the proposed development site. The SWT note that the assessment is appropriate in scope and methodology, confirming that hazel dormouse do not appear to be a constraint on the site.

- Amphibians and reptiles

8.11.10. The application site is located within both the green and amber Great Crested Newt Impact Zones, with the south-eastern corner being within the red impact zone. The area in the red impact zone is outside the application boundary for the main site but will be considered in the access road application.

8.11.11. The EIA states that “The impacts to areas of Great Crested Newt habitat will be extremely limited, as much of the development is focused on existing hardstanding” and goes on to recommend a precautionary method of working to ensure Great Crested Newts are protected.

8.11.12. The EIA confirms the presence of a good population of slow works at the site and recommends that appropriate mitigation to ensure the reptiles are adequately protected. The SWT therefore recommend that a precautionary method of working be developed and submitted to the LPA prior to commencement of development.

- Habitat

8.11.13. The EIA identifies areas of different habitats including: broadleaved woodland, buildings, hardstanding, tall ruderal vegetation, dense scrub and a variety of different grassland habitats and scattered trees. A botanical NVC survey was undertaken which did not identify any species of nationally rare or scarce status on the site, although native bluebell was identified frequently being present within the woodland areas on site. The EIA recommends mitigation measures to protect native bluebells on the site, which is supported by the SWT.

8.11.14. Biodiversity net gain

8.11.15. 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’

8.11.16. 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).

8.11.17. 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.

8.11.18. The submitted Biodiversity Net Gain Assessment details that the proposal has a feasibility to provide a net gain of 12.21% in biodiversity units on-site and will achieve an overall net gain of 24.54% as areas of off-site habitats (within the ownership boundary of the applicant) are to be utilised for biodiversity enhancements.

8.11.19. The proposed net gain measures include retention and management of existing habitats,

including areas of semi-natural broadleaved woodland, semi-improved acid grassland, neutral, semi-improved grassland and improved grassland. Enhancement measures include:

- a mowing regime, seeding, plug planting, spot treatment of invasive species and limiting access of 0.65ha of neutral, semi-improved grassland along the northern boundary of the dog-training field.
- The area of amenity grassland (0.018ha) towards the south of the site will be enhanced to a wildflower meadow grassland.

8.11.20. Other measures proposed include the creation of habitats comprising areas of mixed shrub, wildflower meadow grassland and flood (wetland) meadow mix. Trees will also be planted around the development site.

8.11.21. In terms of off-site measures, the woodland area directly to the east of the application will be enhanced as part of the proposal. The retained/enhanced woodland will be subject to a Woodland Management Plan as previously referenced. The field south of the redline (adjacent to the access road) will be enhanced from its current condition to a wildflower meadow.

8.11.22. 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.

8.12. Climate change and sustainability

8.12.1. The NPPF emphasises the need to support the transition to a low carbon future in a changing climate and new developments are required to meet the requirements of paragraph 157 through suitable adaptation measures, including through the planning of green infrastructure and the reduction in green house gas emissions. Paragraph 162 then states that new development should comply with local requirements for decentralised energy supply and take into account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

8.12.2. Policy D2 of the LPSS requires new development to take sustainable design and construction principles into account, including by adapting to climate change, and reducing carbon emissions. Policies D2(3) and (11) require sustainability and energy statements to be submitted, which the applicant has provided.

8.12.3. Policies D14, D15 and D16 of the LPDMP carry full weight and build on Policy D2. In the context of the Council declaring a climate emergency in July 2019 and the UK having a legally binding target of reducing all greenhouse gas emissions to net zero by 2050 with an interim target of 78% reduction against 1990 levels by 2025.

8.12.4. The application is supported by an Energy Statement as well as a BREEAM pre-assessment. The Council's Sustainability Policy Officer has reviewed the documentation and noted the development is targeting BREEAM Excellent, with the pre-assessment being separated into three components;

- Refurbishment and Fit-out
- New Constuction V6 Offices
- New Construction V6 Residential training institute.

8.12.5. In this regard, the Policy Officer noted that in order to be rated excellent, the scheme must achieve at least 70%, with outstanding being 80%. The pre-assessment demonstrates that the refurbishment and fit-out would achieve 72.25% (potential to achieve 86.28%), the new construction V6 offices would achieve 75% (potential to achieve 87.88%) and the new construction V6 residential training institute would achieve 71.87% (potential to achieve 87.53%). In achieving these values, the scheme would demonstrate compliance with Policies D2 and D14 – D16. To secure this, a condition is recommended requiring the submission of a BRE issued New Construction (or Refurbishment and Fit-Out) Post Construction Certificate prior to occupation, which shows that a BREEAM rating of Excellent (or Outstanding) has been achieved for each component of the development.

8.13. Thames Basin Heath Special Protection Area

8.13.1. The application site is located within both the 400m – 5km and 5km – 7km buffer zone for the TBHSPA. Natural England advise that new residential development in this proximity of the protected site has the potential to significantly adversely impact on the integrity of the site through increased dog walking and an increase in general recreational use. The proposed development would not involve the construction of permanent residential accommodation but would include provision for 20 units within the dog school accommodation building. As the additional residential units would be located within the 5km – 7km buffer zone and would not create over 50 new dwellings, there would be no requirement to provide mitigation in accordance with the TBHSPA Avoidance Strategy. Natural England reviewed the proposal and did not raise an objection. It is therefore considered that the proposed development would not result in a harmful impact on the TBHSPA and no mitigation would be required.

8.14. Legal agreement requirements

8.14.1. 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.

8.14.2. The proposed development includes the delivery of an overall biodiversity net gain of 24.54%. 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.

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

8.15. Planning balance and conclusion

8.15.1. 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.

8.15.2. Harms resulting from the development

- *Green Belt harm*

8.15.3. It was determined that the proposed development 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*

8.15.4. 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.

8.15.5. It is considered that the current mitigation measures as proposed for the development would be sufficient to reduce the potential landscape effect and visual effects to a level that would not be considered to be significant by year 15. Notwithstanding this, the proposal would result in a moderate level of harm to the landscape, including the SHNL, particularly at night-time.

8.15.6. Paragraph 182 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty of national landscapes. Notwithstanding this, the proposal would result in only a moderate adverse significance of effect, which while harmful, shows that the impacts and been minimised and mitigated. Even so, given the wording of the NPPF and taking a precautionary approach **substantial weight** is afforded to the harm on the SHNL, and on visual amenity of the landscape.

- Loss of allocated site housing

8.15.7. Even though the site is allocated in the Local Plan, the proposal would not include any housing, and would also result in the demolition and loss of the existing police housing on the site. This would be contrary to Policies H1 and A33 of the LPSS.

8.15.8. The site was allocated on the basis that the existing use was surplus to requirements and, following its removal from the Green Belt, could offer a sustainable brownfield site for residential use. This is evident when considering the context to the site allocation including that is redevelopment was dependent on the Surrey Police finding an alternative location. The loss of the Police housing and non-delivery of the allocation would therefore not have an impact on the Council’s ability to deliver future housing, nor delivery of affordable homes. Additionally, the Applicant cannot be made to deliver the allocation. They are entitled to pursue other options if the need or desire exists.

8.15.9. While the proposal would result in a loss of housing, Policy H1(2) indicates that 'significant reductions from the approximate housing numbers ... and housing uses as set out in the site allocations will be resisted'. The Policy is not prohibitive and still allows for the loss.

8.15.10. The non-compliance with the allocation and loss of housing is therefore afforded only **limited weight**.

8.15.11. Set against the considerable weight of these identified other harms are a range of other considerations set out in support of the proposals.

8.15.12. Benefits of the scheme

8.15.13. Operational and functional requirements of the dog school

8.15.14. The Surrey Police already operate an internationally renowned dog school which is located on the Mount Browne campus within the central area of the site. The dog school has planning permission, although this was issued in 2000. The facilities are therefore dated and need to be fit for purpose to meet the needs of the Surrey Police and to maintain the high standard that is recognised internationally.

8.15.15. It has been set out in the Planning Statement and the needs statement that the dogs and the associated dog school where they are trained are a vital part of Surrey Police's operations and are deployed daily and keep the public and Surrey Police officer's safe from knife and firearm threats. The Police's firearm support dogs and teams offer 24/7 cover, 365 days a year. The dog unit also provides training for all joint force dogs including those used at Gatwick airport and supports in areas such as digital protection, drugs, counter terror and victim protection.

8.15.16. Operationally the location of the new dog school needs to be in a secure position. Furthermore, Surrey Police require the dog unit to be located adjacent to, or in very close proximity to other key training facilities and other Surrey Police commands to ensure that the dog training is undertaken alongside other training such as taser training and public safety training. This approach ensures multiple specialised disciplines can train together in a safe and controlled environment which is not directly adjacent to residential properties.

8.15.17. The Police have undertaken a search for alternative sites within the Guildford Borough (or close to the boundary) which could locate the dog school facilities. Regard was had to the hierarchy of sites within non-Green Belt and SHNL sites being preferred, followed by brown-field Green Belt sites. Guildford Borough is heavily constrained with circa 89% Green Belt and large areas of SHNL. The alternatives search set out that no other identified sites could be found outside of these sensitive areas which would also be located away from heavily populated areas to avoid amenity impacts. The principle of the use of the site for the Police is also already established and part of the site is already used for dog training.

8.15.18. The need for the dog school, dog school accommodation and associated training facilities therefore have a clear need to be located on the site to ensure these services are retained and continue to operate at a high standard to benefit the community. This is afforded **significant weight**.

8.15.19. Operational and functional need for the development

8.15.20. The key purpose of the proposed development is to secure the future of the Surrey Police Headquarters at the Mount Browne site to ensure they 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. Substantial weight is afforded to this benefit.

8.15.21. Economic and employment benefit

8.15.22. The dog school as the ability to deliver international training and puppy breeding at the dog school facility which would bring some £500,000 income annually for the Force to re-invest in front line policing. The application is not supported by further detail to justify this and is therefore only afforded limited weight.

8.15.23. The Surrey Police current employ approximately 1,500 people who work from the Mount Browne site. This includes police officers and support staff who are vital for operating and maintaining the Mount Browne campus. By retaining and redeveloping the site, employment opportunities will be retained within the Borough and can be provided from the site. The provision of a new campus masterplan at Mount Browne is an important consideration is not only attracting new staff to the site but also retaining staff in the long-term. This is afforded **substantial weight**.

8.15.24. The retention of the Surrey Police Headquarters within Guildford offers not only employment benefits but also economic benefits as employees and visitors would contribute back to the economy through use of services and utilities. The location of the site in close proximity to the town centre, along with the sustainable transportation measures proposed would facilitate free movement around the locality, making it easier to access local services and amenities. The economic benefits of retaining the operation is afforded **substantial weight**.

8.15.25. Enhancements to Surrey Hills National Landscape character

8.15.26. 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**.

8.15.27. Energy Efficiency

8.15.28. The proposal would deliver a gas-free development which will achieve a BREEAM 'excellent' rating incorporating new low-carbon and renewable technologies into the site to support its operation into the future. This is afforded **significant weight**.

8.15.29. Protection of trees

8.15.30. The proposal would rationalise car parking on site and include removal of car parking from within areas of ancient woodland and the RPA of high-quality trees. This is afforded **significant weight**.

8.16. Final balance

- 8.16.1. 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 loss of and lack of delivery of housing in accordance with the allocation.
- 8.16.2. However, the benefits of the scheme are substantial and wide ranging. The scheme would deliver high quality facilities to meet the ongoing operational needs of the Police as well as for staff retention and well-being. The proposal would enable the ongoing operation of a world-renowned dog school. Combined these two benefits would enable easier access to communities to ensure they are kept safe and maintain community confidence in the Policing service.
- 8.16.3. The scheme would also deliver a gas-free development which will achieve a BREEAM 'excellent' as well as rationalise car parking on site and include removal of car parking from within areas of ancient woodland and the RPA of high-quality trees.
- 8.16.4. 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.
- 8.16.5. As such, it is recommended that planning permission should be granted.

Appendix 1: Summary of Landscape Effects from LVIA

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 GO1	High #5.3	Medium #5.14	Moderate Adverse	Small #5.39	Moderate Adverse	Small #5.39	Moderate Adverse
Area GO1 Night-time	High #5.3			Medium #5.45	Moderate Adverse	Medium #5.45	Moderate Adverse
Area MP1	High #5.5	Medium #5.15	Moderate Adverse	Negligible #5.40	Neutral	Negligible #5.40	Neutral
Area MP1 Night-time	High #5.5			Negligible #5.46	Minor Adverse	Negligible #5.46	Minor Adverse
Area RV6	High #5.6	Small #5.16	Minor Adverse		Neutral #5.41		Neutral #5.41
Area RF8	High #5.7	Small #5.16	Minor Adverse		Neutral #5.41		Neutral #5.41
Area GW3	High #5.10	Negligible #5.16	Minor Adverse		Neutral #5.41		Neutral #5.41
Area CR2	High #5.11	Negligible #5.16	Minor Adverse		No Change #5.42		No Change #5.42
Mount Browne	Medium #5.12	Medium #5.17	Moderate Adverse	Small #5.43	Minor Beneficial	Small #5.43	Minor Beneficial
Mount Browne Night-time	Medium #5.12				Minor Adverse #5.47		Minor Adverse #5.47
Surrey Hills AONB	High	Medium #5.18	Moderate Adverse		Minor Adverse #5.44		Minor Adverse #5.44
Surrey Hills AONB Night-time	High			Medium #5.48	Moderate Adverse	Medium #5.48	Moderate Adverse

Appendix 2:~ Summrary of Visual Effects (Public) from LVIA

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 #3.43	Minor (should be Small) #5.22	Minor Adverse	Negligible #5.50	Minor Adverse	Negligible #5.50	Minor Adverse
Vpt 2 - Pewley Down	High #3.44	Minor (should be Small) #5.22	Minor Adverse	Negligible #5.51	Minor Adverse	Negligible #5.51	Minor Adverse
Vpt 2 - Pewley Down Night-time	High #3.74			Negligible #5.87	Minor Adverse	Negligible #5.87	Minor Adverse
Vpt 3 – Chantries	High #3.45	Minor (should be Small) #5.22	Minor Adverse	Negligible #5.52	Minor Adverse		No Change #5.52
Vpt 3 – Chantries Night-time	High #3.75			Negligible #5.88	Minor Adverse	Negligible #5.88	Minor Adverse
Vpt 4 – St Catherine’s Lock	High #3.46	Not provided	Minor Adverse (not Slight Adverse) #5.23	Negligible #5.53 & #5.74	Minor Adverse		No Change #5.53 & #5.74
Vpt 4 – St Catherine’s Lock Night-time	High #3.76			Small #5.89	Minor Adverse	Small #5.89	Minor Adverse
Vpt 5 – Wey South Path	High #3.47	Not provided	Minor Adverse #5.23	Negligible #5.54 & #5.74	Minor Adverse		No Change #5.54 & #5.74
Vpt 6 – Fpth 276 west of sports bldgs. (and by Ridge Farm	High #3.48	Major (should be Large) #5.20, #5.24 & #5.26	Major Adverse	Medium #5.55 & #5.77	Moderate Adverse	Medium #5.55 & #5.77	Moderate Adverse
Vpt 6 – Fpth 276 Night-time	High #3.77			Medium #5.90	Moderate Adverse	Medium #5.90	Moderate Adverse
(Vpt 6) – Fpth 276 adjacent to sports bldgs.	High	Large #5.25	Substantial Adverse	Medium #5.76	Moderate Adverse	Medium #5.76	Moderate Adverse

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 7 – Loseley Park	High #3.49	Minor (should be Small) #5.22	Minor Adverse	Small #5.56	Minor Adverse	Small #5.56	Minor Adverse
Vpt 8 – east (should be west) of Peasmarsh	High #3.50	Low (should be Small) #5.29	Minor Adverse	Negligible #5.57 & #5.80	Minor Adverse		No Change #5.57 & #5.80
Vpt 8 – east of Peasmarsh Night-time	High #3.78			Small #5.91	Minor Adverse	Small #5.91	Minor Adverse
Vpt 9 – east (should be west) of Peasmarsh	High #3.62	Low (should be Small) #5.29	Minor Adverse	Negligible #5.58 & #5.80	Minor Adverse		No Change #5.58 & #5.80
Vpt 10 – The Ridges	Medium (just motorists?) #3.52	Minor (should be Small) #5.22	Minor Adverse	Negligible #5.59	Negligible		No Change #5.59
Vpt 10 – The Ridges Night-time	Medium #3.79			Negligible #5.92	Negligible Adverse (or just Negligible)	Negligible #5.92	Negligible Adverse (or just Negligible)
Vpt 11 – A3100	Medium (assuming this is for non-motorised users - #3.53)	Moderate (should be Medium) #5.22	Moderate Adverse	Negligible #5.60	Negligible		No Change #5.60
Vpt 11 – A3100 Night-time	Medium #3.80			Small #5.93	Minor Adverse	Small #5.93	Minor Adverse
Commercial premises east of A3100 (near Vpt 11)	Low (for people at work - #3.71)	Small #5.32	Minor Adverse	Negligible #5.83	Negligible Adverse (or just Negligible)		No Change #5.83
A3100 – motorists (near Vpt 11)	Low #3.72	Small #5.33	Minor Adverse	Negligible #5.84	Negligible Adverse (or just Negligible)		No Change #5.84
Vpt 12 – Minor road to Rushy Platts Farm	Medium #3.54	Moderate (should be Medium)	Moderate Adverse		No Change #5.61		No Change #5.61

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)
		#5.22					
Vpt 13 – Quadrum Park	Medium #3.55			Negligible #5.62	Minor Adverse		No Change #5.62
Vpt 14 – Chinthurst – Fpth 262	High #3.56	Low (should be Small) #5.29	Minor Adverse	Negligible #5.64 – for Vpt 15? & #5.80	Minor Adverse	Negligible #5.64 – for Vpt 15?	Minor Adverse (No Change #5.80)
Vpt 15 – Shalford Common	High #3.57	Low (should be Small) #5.29	Minor Adverse	Negligible #5.63 – for Vpt 14? & #5.80	Minor Adverse	Negligible #5.63 – for Vpt 14?	Minor Adverse (No Change #5.80)
Vpt 16 – Farley Hill	High #3.58	Minor (should be Small) #5.22	Minor Adverse	Negligible #5.65	Minor Adverse	Negligible #5.65	Minor Adverse
Vpt 17 – Holloway Hill	Medium #3.59			Negligible #5.66	Negligible Adverse (or just Negligible)	Negligible #5.66	Negligible
Vpt 18 – St Catherine’s Hill	Medium #3.60				No Change #5.67		No Change #5.67
Vpt 19 – Artington P&R	Medium (people at bus stop) #3.61	Minor (should be Small) #5.22	Minor Adverse	Negligible #5.68	Negligible Adverse (or just Negligible)		No Change #5.68
Artington P&R (near Vpt 19)	Medium #3.72	Small #5.35	Minor Adverse	Negligible #5.84 & #5.86	Negligible Adverse (or just Negligible)		No Change #5.84 & #5.86
Vpt 20 – Broadford Bridge	High #3.62	Minor (should be Small) #5.22	Minor Adverse	Negligible #5.69	Neutral		No Change #5.69
Vpt 21 – Footway to B3000	Medium #3.63	Small #5.34	Minor Adverse	Negligible #5.70 & #5.85	Negligible Adverse (or just Negligible)	Negligible #5.70 & #5.85	Negligible Adverse (or just Negligible)
Vpt 21 - Footway to B3000 Night-time	Medium #3.81			Small #5.94	Minor Adverse	Small #5.94	Minor Adverse
Vpt 22 – A3100 across railway line	Low #3.64	Minor (should be Small) #5.22	Minor Adverse	Small #5.71	Negligible Adverse (or just Negligible)		Neutral #5.71

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 23 – Footpath 277 at site entrance	High #3.65	Minor (should be Small) #5.22	Minor Adverse		No Change #5.72		No Change #5.72
Vpt 24 – Sandy Lane	Medium #3.66	Minor (should be Small) #5.22	Minor Adverse		No Change #5.73		No Change #5.73
Footpath 277 – western edge of Mount Browne - No Vpt (overlooking valley bottom)	High #3.68	Large #5.27	Major Adverse	Medium #5.78	Moderate Adverse	Medium #5.78	Moderate Adverse
Footpath 277 – western edge of Mount Browne - No Vpt (overlooking car park)	High #3.68	Medium #5.28	Moderate Adverse	Small #5.79	Minor Adverse	Small #5.79	Minor Adverse
Mount Browne – People at Work. No Vpt.	Low #3.71	Large #5.31	Moderate Adverse	Medium #5.82	Minor Adverse/ Beneficial	Medium #5.82	Minor Adverse/ Beneficial