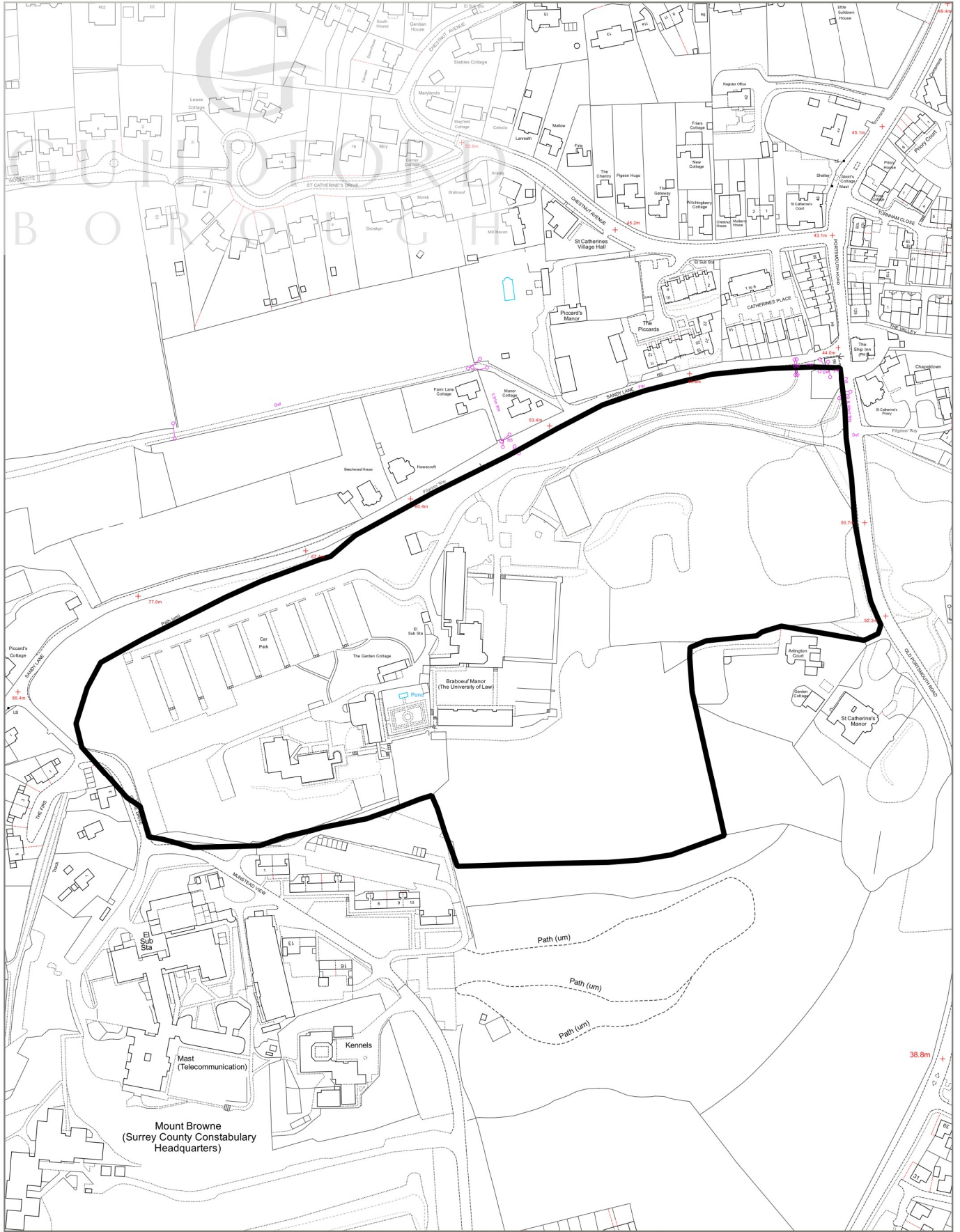


# 23/P/01850 - The University Of Law Braboeuf Manor, Portsmouth Road, Guildford



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Not to Scale



**GUILD FORD**  
BOROUGH

**23/P/01850 – The University of Law Braboeuf Manor, Portsmouth Road, Guildford**



**Not to scale**

**Appl No:** 23/P/01850      **6/8/13 week deadline (including EoT):** 04/02/2025

**Appl Type:** Full Application

**Parish:** Artington      **Ward:** Shalford

**Agent:** DP9 Ltd      **Applicant:** Elysian Guildford LP

**Location:** The University Of Law Braboeuf Manor, Portsmouth Road, Guildford, GU3 1HA

**Proposal:** Full planning application for the demolition and retention of existing buildings and erection of new buildings to provide extra care housing (Use Class C2) and associated ancillary accommodation and amenity space, public realm works, at-grade car parking (existing), plus restoration and upgrade works to Braboeuf Manor (ancillary accommodation and amenity space) and the refurbishment of Pound Cottage for use as a single dwelling (Use Class C3) (amended plans received and description changed on 31.07.24, additional plans dated 10th September 2024).

### **Referral**

This application has been referred to the Planning Committee as more than 20 letters of representation have been received which are contrary to the Officer's recommendation.

### **Officer's Report**

#### **Site description**

The application area extends to 9.5 hectares located approximately 1.5 miles to the south-west of Guildford town centre. Immediately to the north of the site is Sandy Lane, on the eastern boundary is the A3100 Portsmouth Road which provides the sites singular vehicular access, and to the south and west, the site is bounded by the Mount Browne Surrey Police Headquarters.

The campus contains 12 existing buildings and structures ranging from squash and tennis courts to the Grade II Listed Braboeuf Manor House and substantial administrative buildings of up to three storeys providing a range of uses from learning spaces to offices and a canteen. Parking for 388 vehicles is provided on-site with the vast majority of spaces located within a sizeable surface- level car park to the north-western extent of the site.

The site was most recently in-use as a campus of the University of Law. The University vacated the site in the summer of 2024, the site has been unoccupied since.

The application area is well screened to all boundaries by mature trees though the visibility of the site is influenced by significant changes in topography. The land rises steeply from the east to the west. The vehicular entrance to the site on Portsmouth Road is at approximately +46.00m AOD with the driveway rising steadily to reach the Manor House at +62.00m AOD. The site continues to rise sharply to the south of the manor to approximately +75.00m AOD and to the west, to +79.00m AOD. The surface level car park to the north-west sits at +86.00m AOD.

The surrounding area is mixed in character. To the north of the site, along Sandy Lane, there are a number of residential dwellings with the urban area of south Guildford immediately beyond. To the east, beyond Portsmouth Road, is open countryside. To the south and west is the Surrey Police Headquarters, subject to planning application (ref: 24/P/00564) for a replacement dog school with associated staff accommodation, replacement core operational police buildings, ground maintenance compound and refurbishment of core operational building. Construction and refurbishment of associated parking including new decked car park. The application was heard at Planning Committee on November 06, 2024, with Members resolving to grant planning permission subject to Conditions and S106.

As regards designations, whilst the eastern extent of the site, the vehicular access and driveway, are located within the Green Belt, the part of the site which is being developed has already been inset from the Green Belt. The entirety of the site is located within the Surrey Hills National Landscape (SHNL) (formerly Area of Outstanding Natural Beauty) and Area of Great Landscape Value (AGLV). The site sits within St Catherines Conservation Area and, as above, within the site Braboeuf Manor is a Grade II Listed Building. There is a large area of ancient woodland to the east of this Listed Building and a Public Right of Way (footpath FP277) runs through the site from The Drive to the west, to Sandy Lane to the north, skirting the existing surface level car park.

The surface car park on-site forms an allocation in the Local Plan under Policy A34. The policy will be considered in detail below, but in summary, the allocation is for approximately 112 student bedspaces (sui generis).

## **Proposal**

The proposal is for the comprehensive redevelopment of the site to include both the demolition and retention of existing buildings and erection of new buildings to provide extra care housing (Use Class C2) and associated ancillary accommodation and amenity space, public realm works, at-grade car parking (existing), plus restoration and upgrade works to Braboeuf Manor (ancillary accommodation and amenity space) and the refurbishment of Pound Cottage for use as a single dwelling (Use Class C3).

Works are concentrated to the previously developed area of the site which has been divided into three zones. Proposals within each are detailed below.

The remainder of the site is, as existing, to comprise of wooded and landscaped areas. The front of the site, the grounds to the east adjacent to Old Portsmouth Road, are to be publicly accessible. The only built form within this area is that of Pound Cottage. Located to the north-east of the site at the junction of Sandy Lane and Old Portsmouth Road. Proposals include the refurbishment of the existing two-storey, two-bedroom C3 dwelling.

### **Zone 1**

Located to the centre of the site zone 1 is to comprise four new buildings and the refurbishment of the Grade- II listed Braboeuf Manor and associated ancillary listed buildings.

Demolition of exiting squash court building, Administration Building and Denning Building is proposed. New/ retained development is to comprise;

#### Block A

Ancillary to Use Class C2, a two-storey pavilion building to be built into the landscape and sited to the north-east of the Manor. To all elevations, the building will present as single-storey owing to the existing topography on site.

The first floor is to be at grade with the formal lawn sited to the front of the Manor House and accommodate a restaurant, available for both resident and public use, and wellness facilities for residents to include a swimming pool and gym.

The lower floor is to comprise of facilities for staff, restaurant kitchen and associated storage and plant.

#### Block P

Ancillary to Use Class C2, a two-storey pavilion building to be located to the north-west of the Manor on land currently comprised of the squash court building.

Block P is to comprise, on the ground floor, refuse facilities for the proposed C2 accommodation. On the first floor, air source heat pumps and associated equipment intended to serve all buildings within Zone 1.

#### Block B

To be located on land currently occupied by the Administrative Building the two-storey building sited immediately adjacent to the north of the Manor House. A separation of 7.7m between the block and manor house is to be introduced.

The block is proposed to be of two-storeys to its southern extent, closest to the Manor House, rising to three-storeys to the north and is to comprise 8 x two-bedroom, dual-aspect C2 dwellings.

#### Block D

To be located directly to the south of Braboeuf Manor on land currently occupied by the Denning Building which is to be demolished. The proposed block, to be built into the hill, is to be three-storeys and comprised of 23 x C2 dwellings (8 x one-bedroom units, 13 x two-bedroom units and 2 x three-bedroom units).

#### The Cowshed

A single-storey outbuilding sited directly to the south of Block D, the cowshed is an ancillary listed building proposed to be repurposed to provide a studio guest suite for the use of friends and family of residents.

#### Braboeuf Manor

Proposed works to the Manor House involve the reinstatement of its northern elevation further to the proposed removal of the currently adjacent Administrative Building. Externally, works to clean and repoint the façade are proposed.

Ancillary to Use Class C2, the Manor House is proposed to provide amenity and social spaces for residents, to include a library and multi-functional spaces. Offices and administrative space to serve the running of the site are to be accommodated here.

## **Zone 2**

Located to the south-west of the site, zone 2 is to comprise three new buildings and the refurbishment of ancillary listed buildings.

Demolition of the existing Fountain Court Building and Learning Resource Centre is proposed.

### Walled Garden

Located to the south-west of Braboeuf Manor, to the east of the existing Fountain Court and to the west of the existing Denning Building. The Summer House is located to the north-east corner of the garden.

The garden is considered curtilage listed and is to be retained. Proposed works involve refurbishment and planting.

### Garden Cottage

Located to the west of Braboeuf Manor and north of the Walled Garden, the Garden Cottage is to be largely retained and repurposed to provide one two-bedroom C2 dwellings.

### Block G

Located directly to the west of the Walled Garden on the site of the existing Fountain Court. A building with a level change of approximately 3m between east and west elevations stepping up the hill though maintained at three storeys.

Proposed to comprise twenty C2 dwellings, 1x one-bedroom, 18x two-bedroom and 1x three-bedroom units.

### Block H

Moving up the hill to the west and broadly located as per the existing Learning Resource Centre, the Block is to be of five-storeys stepping up the hill, Again, with a level change of approximately 3m between east and west elevations the block is to be built into the landscape.

Proposed to comprise 44 C2 dwellings, 6 x one-bedroom, 37 x two-bedroom and 1x three-bedroom unit.

### Block J

Located to the western extent of the site beyond Block H, a part four, (to the west) part five-storey block which experiences the same 3m level change between east and west.

The block is to accommodate 35 C2 dwellings.

### Zone 3

Located to the north-west of the site, no development is proposed within the zone. Proposals include the retention of the existing surface level car park.

#### Summary of proposal

Total number of on-site car parking spaces: 280 (within the existing surface level car park in Zone 3).

Total number of extra care units (Use Class C2): 131 (mix of one-bed x 15; two-bed x 110 and three-bed x 6)

Total number of dwellings (Use Class C3): 1 x two-bed.

Total number of guest accommodation (Ancillary to Use Class C2): 1

### Relevant planning history

<b>Reference:</b>	<b>Description:</b>	<b>Decision Summary:</b>	<b>Appeal:</b>
23/P/01851	Listed Building Consent for works to Braboeuf Manor and curtilage listed buildings to facilitate their use as ancillary accommodation and amenity space for the extra care housing. The curtilage listed buildings are: The Garden Cottage and attached workshops, Garage workshop, Summer House, 'The Cow Shed' and Pound Cottage (66 Sandy Lane).	Reported elsewhere on this agenda	N/A

### Consultations

Below is a summary of the comments received from consultees as part of the process. It should be noted that Members can review all of the responses received in full on the Council's website.

#### Statutory consultees

County Highway Authority, Surrey County Council: No objection subject to S106 contributions, conditions and informatives. Contributions are recommended to be secured towards highway improvements within the vicinity of the site. This will be discussed further in the highways section of the report.

Countryside Access Team, Surrey County Council: No objection subject to informatives. County Archaeologist, Surrey County Council: The County Archaeologist notes that the applicant's assessment is comprehensive and has consulted all appropriate currently available sources including the Surrey Historic Environment Record, in order to provide a thorough overview of the archaeological potential of the site and surrounding area. The report concludes that the site has an uncertain potential for the prehistoric period, with a low potential for Roman and early medieval remains but that there is a moderate to high potential for archaeological remains associated with the Grade II listed late sixteenth century Braboeuf Manor. This potential includes possible evidence of medieval activity

associated with the manor as well as post medieval evidence of a possible lost wing of the current building as well as ancillary structures. The site also may contain surviving evidence of extensive early twentieth century formal gardens. Due to the potential for significant archaeology to be present the report recognises that further archaeological investigations will be required within areas of the site where development is proposed. As a first stage a geophysical survey is proposed, and I agree that this would be appropriate and will aim to identify any surviving archaeological remains and structures that may be present. The applicants have included a specification for a geophysical survey that incorporates two different techniques that are appropriate for the site and is acceptable. Following the geophysical survey, the results will inform a programme of trial trench evaluation that will further clarify the nature and extent of any archaeological remains. The results of the evaluation will enable suitable mitigation measures to be developed. Given that the assessment has demonstrated that the site is has been partly disturbed by past development and some areas have been terraced, it would be reasonable and proportionate to secure the programme of archaeological investigations as well as any mitigation measures that may be required, by the use of a planning condition.

Environment Agency: The EA note that this planning application is for development they do not wish to be consulted on.

Natural England: Based on the plans submitted, and a site visit on 26 November 2024, Natural England (NE) considers that the proposed development at The University of Law has potential for significant effects on protected landscapes, namely the Surrey Hills National Landscape, formerly Area of Outstanding Natural Beauty (AONB). NE are content that the impacts on the Thames Basin Heaths Special Protection Area (SPA) can be mitigated through contributions towards Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM).

Historic England: Historic England (HE) notes that Braboeuf Manor is an important sixteenth century house and landscape which remains a key landmark within the St Catherine's Conservation Area and the Surrey Hills AONB. The scheme still includes a large number of new buildings or up to five storeys which will inevitably have an impact on the grade II listed manor, its setting and the designed landscape around it. The amended scheme still poses a degree of harm but has come some way in addressing the concerns raised previously. HE consider that further changes could and should be made to reduce the remaining harm further, but we leave discussion on securing this to the applicant and the conservation specialists at Guildford Borough Council. HE leave it to Guildford Borough Council and its conservation specialists to decide whether the residual harm identified above has been convincingly justified and outweighed. Given that harm is still identified and taking into consideration the Inspector's conclusions in the recent Guildford Cathedral appeal decision, the question remains as to whether the public benefits of this scheme could be achieved in a less harmful manner.

Thames Water: Thames Water notes that they cannot determine the waste water infrastructure needs of the development or whether the existing water network infrastructure can accommodate the needs of the development. However, Thames Water are of the opinion that both of these issues can be dealt with by condition.



Lead Local Flood Authority, Surrey County Council: No objection subject to suitably worded conditions to ensure that the SuDS Scheme is properly implemented and maintained throughout the lifetime of the development.

Active Travel England: Active Travel England (ATE) note that they have reviewed the further information submitted. While it is accepted that there are constraints around ensuring that routes to local amenities in Guildford are attractive and safe for walking, wheeling and cycling, should it be the case that these constraints are insurmountable, then it is for the LPA to consider whether this location can be considered sustainable for this proposal in line with the NPPF. Currently it is considered unlikely that either residents, visitors or employees would be enabled to walk, wheel or cycle due to the poor quality of existing routes available.

AONB Planning Advisor: The AONB Planning Advisor raises serious concerns. A summary is provided below. The full comments from the AONB Planning Advisor can be read on the Council's website.

- if the Council is minded to permit this revised application it needs to demonstrate that it has met this new legal requirement. Whilst Officers have discussed the previous proposals with the applicant's consultants and they have responded with these revised proposals, the quantum and building bulk in these latest proposals still clearly do not conserve and enhance the natural beauty of the Surrey Hills National Landscape/AONB. According to NPPF paragraph 182 great weight needs to be given to failing to meet this purpose of AONB designation in any final planning balance;
- the issue remains as to whether this proposal constitutes major development in an AONB thereby bringing NPPF paragraph 183 into play. Unless exceptional circumstances exist or where it can be demonstrated that the development is in the public interest permission should be refused under NPPF paragraph 183. The paragraph states that consideration of such applications should include an assessment of three listed matters;
- there would still be a significant increase in floor area. Consideration needs to be given to the applicant's intention for proposals to follow for additional buildings in the car park site on the hilltop. Judgement is that this is a major development in an AONB has taken into account the nature, considerable scale and massing of development, its setting partly on rising ground and in the setting of a listed building, together with the proposals likely to have a significant adverse impact on the purposes for which the area had been designated. (NPPF footnote to paragraph 183);
- some of the design revisions to the scheme are welcome. If the scale, form and design of the building proposed to the west of the Walled Garden were to be repeated with slight variations throughout the scheme, particularly in the blocks stepping up the slope to the rear and rising in part to 6 storeys, then the scheme would be more acceptable from an AONB aspect. The roof gardens are also welcome provided they can be ensured to happen which is not always the case;
- also welcome is the improved routing of the North Downs Way through part of the site and making the open space in front of the listed building available for public use. Some of the elevational design amendments of the blocks are improvements especially to the upper floor. The design of block A containing a restaurant and other community facilities would be an attractive feature. Also recognise there is a need for this type of accommodation with an increasing aged population in the Guildford area. But the Planning Authority might only attach moderate weight to these improvements and benefits compared to the great weight to the sheer amount of development proposed that would not conserve and enhance the AONB;

- whilst the number of blocks stepping up the hill has been reduced from four to three, the current proposed blocks would be considerably deeper. The distance between the blocks is very limited. The consequence of this is not just one of privacy but one of the collective bulk of the blocks being read from some angles more like as being one. The development bulk would still be perceived as being considerable as also illustrated in one of the perspectives showing the front of Braboeuf Manor;
- concerned that the amendment to delete the open market, non-elderly housing and multi-storey car park proposals in the original submission leaves the current proposal as a piecemeal proposal; and
- in conclusion, still have serious AONB concern relating to the above proposal for the above reasons.

#### Internal consultees

Waste and Recycling (Environmental Services): No response received.

Head of Environmental Health and Licensing: No objection subject to standard conditions relating to contaminated land, air quality and noise.

#### Non-statutory consultees

Health and Safety Executive: From the information provided for this planning application, it does not appear to fall under the remit of planning gateway one because the height condition of a relevant building is not met.

Surrey Wildlife Trust: No objections raised; however, additional information has been sought (both before determination and before commencement of the development). This will be addressed in the report below.

Education Authority, Surrey County Council: No objection. The Education Authority have confirmed that they do not seek contributions for care dwellings or for developments of less than ten C3 homes.

Surrey Police (s106 requests): A contribution will not be required in this instance.

Surrey Police, Crime Reduction Officer: Notes the following comments:

- stress the importance of ongoing management of the public areas of the site, in the light of the following reference in the DAS part 4: 'As part of the comprehensive redevelopment of the site, Elysian's brief includes creating inviting, safe and usable landscaping which would not only improve the setting of any proposal going forward, but could also help it integrate into the wider ecology of the area and respect the heritage of the site., The proposal should offer the opportunity for the site to be more open for the public.'...and Social: Active Community - creating a safe and sociable place for people to live and interact, enhancing existing communities and fostering new connections.' This area should be designed, staffed, and managed as any other public park in the Guildford Borough, with the safety of the public in mind;
- the proposed foot path that appears to be intended to be a pedestrian route from the development to link to Sandy Lane, should be reconsidered. As this could be used to access or egress the site for criminality; and
- Secure by Design should be achieved [Officer Note: This could be secured by condition].

NHS Surrey Heartlands Integrated Care Board (ICB): The ICB have reviewed the updated planning application and note that the proposed development is resulting in 131 extra care units (Use Class C2). We highlight that the provision of specialist accommodation for older people can include a high level of personalised care and support, however, relies on health infrastructure in the local area including primary care facilities, and their impact on healthcare infrastructure must be considered in the same way as for self-contained residential accommodation. Residents coming forward from the provision of specialist accommodation for older people will require access to the full range of primary care services, and it is accepted that older patients place a higher demand on practices as evidenced by practices weighting patient demographics. An index linked S106 financial contribution will therefore be sought in lieu.

Twentieth Century Society: The Society objects to the application on account of the proposed demolition of the former college buildings, which should be identified as Non-Designated Heritage Assets (NDHAs) and positive contributors to both the setting and significance of the Grade II listed Braboeuf Manor and to the wider St Catherine's Conservation Area.

Surrey Historic Buildings Trust: The Trust strongly objects to the proposals. The following concerns are noted:

- the proposed development would have an adverse effect on the character and setting of Braboeuf Manor, that is listed for its special architectural or historic interest at Grade II;
- the site is within the St Catherine's Conservation Area, and the proposal would have an adverse effect on the character of the conservation area;
- the proposed buildings are out of scale with the heritage assets;
- the proposal includes the demolition of twentieth century buildings that are historically and architecturally significant and, which are understood to be structurally sound and capable of continued use; and
- the unnecessary destruction of sound buildings has an adverse effect on the environment.

#### Amenity groups / Residents associations

Artington Parish Council: Raise an objection to the proposal. The following is a summary of the main points raised (Members can read the comments in full on the Council's website). The Parish Council's comments on the original proposal are summarised immediately below. It should be noted that some of these comments will no longer be relevant due to the amendments which have since been received.

- concerns regarding the outline element of the application and that it is difficult to assess its impact on the Parish without full details;
- unclear why, in particular, the car park falls within the outline application and lacks detail about this significant building when car parking would be integral to the practical completion of the rest of the development which, in turn, would require at least sufficient parking to accommodate the residential units in Zones 1 and 2 were permission granted;

- the height, scale, mass and visual consequences of the entire development and particularly the height and mass of the buildings intended for Zones 2 and 3 (including the multi-story car park) would be too large given the severe and adverse impact that would have on the setting of the heritage assets of Braboeuf Manor and the wider AONB landscape;
- the scale, height and mass of the proposed buildings would be significantly out of scale and character with the heritage and adjoining buildings being preserved of Braboeuf Manor itself and also other local properties (along Sandy Lane) and this development would appear overly dominant and incongruous across the application site. Such buildings would damage the setting also of neighbouring properties along Sandy Lane by virtue of them being overlooked and subject to light pollution from the development as a whole and particularly what may follow into Zone 3 by way of multi-storey car park and high-rise residential blocks;
- similarly, what is proposed in this application, by its scale, mass and height, would involve overly prominent and overbearing buildings particularly when viewed from the front of the Manor (being the only approach to the entire site). It would also impact adversely on the setting of this heritage asset and would be detrimental to its heritage significance and detrimental to its wider heritage setting and the landscape as a whole;
- the Parish Council does not accept that just because the current car park for the University of Law (proposed Zone 3) has previously been allocated to accommodate 112 units of student accommodation that it follows that that area is now destined to be developed to the sort of scale as proposed, albeit in Outline, for Zone 3 of this application including a multi-storey car park. Such student accommodation is no longer required in this area and the underlying basis upon which that particular land was allocated has since fallen away;
- past allocation for a specific purpose which is no longer required nor even viable in this location should not be relied upon now as justification for incongruous and substantial development on the same land which sits within the ANOB and AGLV;
- the Parish Council is particularly concerned that the amount of new traffic generated by this development, including the 104 new units in Zone 3, will add to an already highly congested (at peak times) main access route into Guildford; it may also push traffic along Sandy Lane despite its status as Access Only given the proximity of that route to the development's entrance and the increased traffic overall will only incentivise the use of Sandy Lane as a 'rat run';
- the Parish Council notes (and endorses) the concerns raised in the correspondence received from the Countryside Access Team (1 December 2023) as to any uncertainty around the development and the route of footpath 277; clearly this must be addressed accurately;
- any consideration of a secondary access for emergency vehicles (as referred to by Surrey County Council Highways and Transport Department (28 November 2023)) should not be at the expense of the visual rural aspect of Sandy Lane nor should it give rise to any risk of access in/out from the development site by residents or deliveries onto Sandy Lane (particularly from Zone 3). This is because any additional access route into the site would entirely negate the virtue, as the Parish Council sees it at least in this regard, associated with the development having a single point of access along its main entry route from Portsmouth Road which, in turn, should operate to eliminate any related traffic from the development using Sandy Lane;

- the Parish Council does not accept the conclusions of the applicant's own Landscape and Visual impact Assessment that this application would lead to 'no significant effects on the Host Landscape Character' (pg 1); their own table of conclusions finds that there would be Adverse effects in all but one (neutral) receptor category;
- the parish council takes the view that this development would not satisfy the fundamental requirements of national and local policy given the scale, height and nature of what is proposed within the AONB. It considers the application should be refused on this basis;
- whilst the site is inset from the Green Belt, the parish council thinks consideration should still be given to policy protections afforded to the Green Belt particularly for Zone 3 and what is the Law School car park, and which was only allocated specifically for student accommodation - a need which has now gone;
- this application includes inappropriate building heights for what is proposed in Zone 3 (and Zone 2) given the topography and the impact it will have on the setting of the Manor. It is noticeable how, when allocated for student accommodation, key considerations included the impact development would have on the AONB as well as ecological concerns and the impact on the heritage assets all of which are very relevant considerations now and which the Parish Council considers would count against this development;
- the Parish Council would urge careful consideration of the scale of this development and the new buildings; the likely light pollution impact (particularly when the boundary trees along Sandy Lane have dropped their leaves) will, in the Council's view, be obtrusive to houses along Sandy Lane. The Parish Council anticipates that the degree of change, in terms of light pollution (take for example Zone 2 and 3 and an open sided multi-storey car park), that this development would bring about is unacceptable; and
- the Parish Council recognises that the potential for redevelopment and improvement alongside a long-term commitment to the proper management of a site of significant heritage importance within the Parish, could, in theory, benefit the Parish. However, this cannot be at the expense of the preservation and enhancement of the heritage site in its setting or at the expense of the avoidance of harm to the AONB, the AGLV and the surrounding Green Belt. The Parish Council considers that any such benefits inherent in this application are far outweighed by the substantial harm this proposed development would cause to the site, its setting and the surrounding landscape and the Parish council is therefore opposed to it.

Following the receipt of amended plans, the Parish Council responded with the following comments:

- the changes are acknowledged, in particular the reduction in height in Zone 2 and the removal of the outline element in Zone 3;
- concern regarding the overall scale, mass and height of the buildings;
- concern regarding the harmful and detrimental impact such buildings would have on the setting of Braboeuf Manor and its curtilage;
- concern regarding the harmful and detrimental impact such buildings would have on local ecology and on the landscape which should be afforded the highest level of protection. Designations mentioned include the Green Belt, St Catherines conservation Area and the Surrey Hills National Landscape;
- the changes do not go far enough to remove the Parish Council's objection;
- there is no public interest to justify the proposals;

- the Parish Council is not convinced that the harm caused by the proposal is met or justified by public interest benefit; and
- the benefit of opening the site for public access is questioned.

Guildford Society: Raise strong objections to the proposal. The following is a summary of the main points raised (Members can read the comments in full on the Council's website). The Society's comments on the original proposal are summarised immediately below. It should be noted that some of these comments will no longer be relevant due to the amendments which have since been received.

- concerns regarding the public consultation carried out by the applicant;
- the developers claim that there is a considerable need for extra care housing. The Society note that they can understand this need but also note the proposed development will be a very high specification upmarket facility probably out of the reach of most people in the Guildford area. It is not clear that it will provide benefits such as allowing the downsizing from large family houses to a large degree and that the population of the site may come from a large area in the southwest quadrant around London. The Society are not convinced that the development will make a major impact on the circa 500 extra care places that are required in the Guildford area;
- the application is silent on affordable housing provision;
- the proposal would provide 100 market apartments. The Society argues that apartments are well catered for through other developments in the area and that this site may be better suited to family housing;
- the proposed plan is two- three times the size of an agreed and consulted upon policy in the local plan. The reasons for this large change, apart from commercial gain, needs to be fully explained. The applicant is thus asking for a series of buildings which are going to be far larger than the existing buildings on the site in area...The proposed floor space is significantly larger than the current buildings on site. This impacts the height and mass of the development;
- the Society contends that the height and scale of the buildings proposed for the site are totally out of scale with the surrounding buildings in the conservation area. As a measure of scale the blocks O and N which are joined have a total length of approx.76 metres, which is longer in unbroken length to modern town centre developments e.g. the St Marys Wharf (Debenhams) site south block is only 60 metres in length. The recently completed north block of the Solum Guildford Station development, The Mint, is approximately 55 metres in width;
- the scale of the buildings envisaged for the site is adopting a scale that is to be expected for a town centre location rather than a significant edge of town location bordered by areas of outstanding natural beauty and overlooking the Surrey Hills;
- the proposal for five and six storey blocks is an over development of the site and completely out of character with the adjacent conservation area;
- disappointing to see, yet again, a site being developed which is using one architectural style across the entire site, providing little architectural variety. This is especially important in St Catherines which has a variety of styles, building colourations, variety of roofscapes and mixture of materials. This is part of the areas character and charm that and has evolved over the years. Having a design monoculture which the Law College development represents is a retrograde step...and creates a very forbidding and uninteresting environment;

- the applicants have shown no details about how the proposed development will relate to Mount Brown (LPSS policy A33) (the Police Headquarters) which in itself is subject to a redevelopment application which will be coming forward shortly. It is surprising that the applicants have not seen fit to at least detail how these two sites would integrate in terms of views overshadowing etc;
- the Society raise concerns about the impact on five key views in the surrounding area;
- the proposed scheme...could be considered to cause 'less than substantial harm' to the Conservation Area and relevant assets. Its reliance on screening by trees must be questioned as trees are not permanent features of the landscape;
- concerns about cyclist and pedestrian access to the site; and
- potential concerns regarding on-site parking and deliveries.

Following the receipt of amended plans, the Guildford Society responded with the following comments:

- the buildings are still totally out of scale in height, unbroken lengths, bulk and mass. The surrounding area consists of a variety of modest buildings;
- harm to the setting of Braboeuf Manor;
- new design has a commercial style, and the architecture and design is inappropriate for a conservation area and its proximity to Braboeuf Manor. The scale of the development would be more suitable for a town centre site;
- conflict with the character of the conservation area;
- harmful impact on listed buildings including St Catherine's Chapel;
- the proposal would be visible from key viewpoints around the town;
- the application is silent with regard to the future aspirations for the existing surface level car park;
- concerns regarding the impact on the highway, unsuitability for cycling and tight turning areas on-site; and
- understand the need for extra care housing, but this need should be carefully balanced against the harm to the National Landscape.

Guildford Residents Association: Raise an objection to the proposal. The following is a summary of the main points raised (Members can read the comments in full on the Council's website). The Residents Association comments on the original proposal are summarised immediately below. It should be noted that some of these comments will no longer be relevant due to the amendments which have since been received

- the planning authority's statutory obligation under section 85 of the Countryside and Rights of Way Act, 2000 has been made more demanding so that now it 'must seek to further the purpose of conserving and enhancing the natural beauty of an AONB'. The local authority and, in particular, the planning authority, now has a duty to seek to further the purpose of conserving and enhancing the natural beauty of the Surrey Hills AONB;
- not only should the Local Authority expect the scale and extent of development in the AONB to be limited; it is also explicitly required to ensure development in the setting of the AONB will avoid or have minimal adverse impact;
- major development (which this is) should be refused in AONBs and National Parks other than in exceptional circumstances in the public interest;

- there is no justification for a scheme harmful to AONB purposes on this site. Development on this scale with this impact should be refused. The new duty to further conserve and enhance the natural beauty of the landscape makes it even more important for the Council to apply this 'test' rigorously, setting out its reasoning;
- as a greenbelt site, any major development is contingent upon very special circumstances which have not been established. Guildford has a housing supply in its Local Plan without reliance on harmful development on this site;
- gross intrusion into the landscape due to scale and mass;
- complete disregard of the local character due to the angular silhouette, and heavily engineered urban structures, contrasting with the human scale surroundings;
- harm to the setting of St Catherines Monument and Braboeuf Manor;
- uniformity of design approach to a single scheme ten times larger than the previous largest scheme in the area, St Catherines Drive. Development in the area has always largely been by individual plot so this proposal is overwhelming to the local character;
- outline application only for the most visible part of the site, the car park, where acceptability of any development is crucially dependent on an unusually high level of detail; with layout, materials palette, screening and tree protection, light pollution, impact on wildlife and flora (during construction and long-term) just some factors that need to be determined with precision in addition to scale, mass and height. An outline planning application based on parameter plans is entirely inappropriate;
- a multi-storey car park is not an appropriate solution. It is a particularly intrusive structure, and use, currently proposed for the highest point of the site where only outline consent is sought; it is part of a plot, which could easily become controlled by a third party, which the developer has readily acknowledged is its strategy;
- failure to conserve mature trees in and around the car park site in particular; the number of trees proposed to be felled is excessive;
- reliance on screening by trees on adjacent sites is unacceptable; all development should provide for its own screening as a matter of public policy and good planning; and
- consultation did not fairly represent the proposals; any representations submitted, e.g. the need for development to be unobtrusive, appear to have been disregarded.

St Catherines Village Association: Raise an objection to the proposal. The following is a summary of the main points raised (Members can read the comments in full on the Council's website). The Association's comments on the original proposal are summarised immediately below. It should be noted that some of these comments will no longer be relevant due to the amendments which have since been received.

- concerns regarding the consultation exercise carried out by the applicant prior to the submission of the proposal;
- current developments respect the established scale of buildings in the area and it is expected that new development on the subject site should respond similarly. The exceptional extent of the proposal adds further challenges of scale which this application does not begin to address;
- 90% of the development is in Zones 2 and 3. At least 90% of attention should be devoted to the real proposal, which in its current form would destroy a large area of Green Belt / AONB. It would adversely affect the experience of the countryside for miles around since it would stick out like a sore thumb in views;
- classic overdevelopment, since it's proposed to treble the existing accommodation in Zones one and two;



- it is axiomatic that a significant increase in the amount of development in such a location is contrary to the AONB designation, and therefore contrary to planning policy. It would need to demonstrate exceptional circumstances justifying the need for wholesale development of flats in this unsustainable location. There are ample consented flats in more sustainable locations within Guildford now. It would be easy to add the services of an on-site nurse and emergency communication to those other schemes if there were real demand from less able persons;
- the AONB status demands exceptionally high standards of design, aimed at integrating the buildings into the landscape in a way that minimises harm. The proposed buildings fail to do this, not just because of the scale, extent and height, but the size, regularity and uniformity of the block plans and the lack of individuality as between different elements of the scheme;
- concerns regarding tree removal and retention;
- proposal is completely out of character with other development in the conservation area that forms the setting in which the site sits. Three times higher and more massive in every direction than typical existing buildings. Two runs of four parallel, identical blocks of flats is more like a Soviet era scheme imposed by central planners who never visited the location. The site is clearly outside the urban boundary. Urban-type development is therefore inappropriate. Blocks of flats so high they need lifts is the quintessential definition of urban. The type of development proposed here belongs in the town centre, not beyond the urban area;
- harm to the Green Belt;
- harm to a number of views in the surrounding area;
- the blocks of tall, regularly spaced, uniformly designed units gives an institutional feel; or maybe just reflects a lack of imagination and the focus on cost. It contradicts the stated aspiration of a luxury scheme. This is fundamentally unimaginative architecture which is being imposed on a landscape of the highest order, and which can be observed from the north west to south east for miles around;
- completely inappropriate to consider the planning application constrained purely by parameter plans, which permit material flexibility, and in this case elastic walls that can get a metre bigger, in such a sensitive location. This application for an outline consent for a series of big boxes, with no consideration of how they will end up looking, or the practicalities of construction, is premature;
- the amount of accommodation applied for on the car park is vastly excessive;
- the scale of the development sought is many times that contemplated by the local plan;
- any development contemplated on this site, in an area with the highest level of protections, needs exceptionally well-considered screening. The applicant proposes removing all the trees along the northern boundary of the Zone 3 site that would be there for screening purposes. There are few trees on the embankment above Sandy Lane, but they do not appear high or substantial enough to provide an effective screen. And in addition, all the trees that have been carefully planted perpendicularly to the boundary across the car park to break it up particularly when viewed obliquely would be removed;
- real risk that there will be insufficient demand for a large amount of extra care living in Blocks G-K. Note block K is 15 m above block G and access is via a series of flights of stairs which we regard as a serious impediment to the infirm. Not persuaded that the shuttle service is a satisfactory solution that would endure in perpetuity;
- pleased to endorse Historic England's generally perceptive observations;

- the proposal is truly frightening in its excessive scale and alien character that would destroy a protected landscape. The destruction would be visible from miles around, and therefore detract from the broader protected landscape in which it sits, and of which it forms apart;
- the proposal has no identifiable public benefits; and
- this is a particularly bad proposal for eight tall apartment blocks and other lower buildings adjoining the Manor House. The eight blocks are of a scale suitable for a site near a London underground station, not in the middle of the Green Belt and AONB and in a conservation area.

Following the receipt of amended plans, the St Catherines Village Association responded with the following comments:

- concerns regarding the harm to Braboeuf Manor and the design of the proposed buildings which are said to be largely glazed making them appear like part of a business park;
- buildings out of keeping with the character and scale of St Catherines Conservation Area;
- proposed buildings due to their size and scale would be more appropriate to a town centre site;
- diametrically opposed to the local character of the area which is small scale individual dwellings;
- adverse impact on the Surrey Hills National Landscape. The existing structures are subservient to the landscape. The large, urban scale buildings proposed are inappropriate;
- impact on views in the area;
- the allocation should be struck out;
- excessive provision of parking;
- it should not be assumed that the existing car park will remain as such in the future; and
- gross overdevelopment of the site.

Campaign to Protect Rural England (CPRE): Raise an objection to the proposal. The following is a summary of the main points raised (Members can read the comments in full on the Council's website) [Officer Note: The comments received from CPRE were received during the initial consultation on the original application. As has been set out above, the scheme has since been amended, however, revised comments have not been received from CPRE. As such, some of the points made below are no longer relevant / accurate due to amendments to the proposal]:

- this whole proposed development site has not been allocated for development by Guildford Borough Council in its Local Plan 2019 other than a part under A34 which states the site allocated is for approximately 112 student bedspaces. As such this proposal is not confined to an allocated site and incorporating Green Belt there should be no presumption in favour of development;
- the proposed plan for the allocated A34 part of the site is two- three times the size of the agreed and consulted upon policy in the Local Plan 2019;
- the 112 student bed spaces allocated for the site in the 2019 Guildford Plan are no longer required and the allocation was for very specific reasons to support the educational establishment. Those reasons no longer apply;

- the application is 'inappropriate development which per paragraph 152 of the 2023 NPPF is by definition harmful to the Green Belt and should not be approved except in very special circumstances;
- noted that the site is within the Surrey Hills National Landscape (formally Area of Outstanding Natural Beauty (AONB)) which is afforded a high level of protection;
- Historic England state the proposal would harm the significance of the manor's setting as a landmark building within the conservation area, particularly because of the topography of the site which would make the new residential blocks appear dominant in views of the Manor...the setting and historic aspects relating to such buildings carry great importance;
- the visual aspect is of concern. eight tall apartment blocks / substantial bulk, mass, height and overdevelopment of the site - Zone 2 and Zone 3 in particular;
- development overly dominant, rising to five / six storeys with steep roofs extending up the steep hill / large multi storey car park and thus detrimental effect on environment and Green Belt, Surrey Hills National Landscape and AGLV;
- the visualisations provided by the Guildford Society are very helpful to understand just how over dominant and inappropriate the proposal is. The height of the proposed buildings and multi storey car park will be clearly visible from footpaths and other viewing sites within the AONB, Hogs Back, from the River Wey and across the borough from as far as the Downs at Pewley Down. This will create an unacceptable impact on the visual character of the area due to the overdevelopment, bulk, height and size.
- there will be a damaging affect, on the views in and out of the National Landscape; and
- the applicant has failed to demonstrate the very special circumstances sufficient and required to outweigh the harm to the Green Belt, National Landscape and the St Catherines Conservation Area.

### **Third party comments**

97 letters of objection have been received with the reasons summarised below. The full details of each objection received can be found on the Council's website.

#### Amenity impacts

- impact on the North Downs Way walking routes
- daylight sunlight and overshadowing impact on neighbouring properties
- light coming through deciduous trees not properly assessed.
- loss of privacy, overlooking

#### Environmental impacts

- light pollution
- highways impact on local roads adding congestion and air pollution.
- lack of sustainability considerations
- increase in light impacts due to change of use
- impact on climate change from the removal of trees.
- the impact on views will detrimentally impact tourism.
- impact of construction works resulting in mud, dust and smoke.
- impact on the water table of the removal of soil
- impact of noise of the restaurant especially deliveries and the location of waste storage and air source heat pumps.

- impact of odour from commercial and residential bins
- impact of thermal management unit located in close proximity to residential dwellings.
- excessive noise impacts at night.

#### Biodiversity and landscape impact.

- Landscape and Visual Impact Assessment illustrates harm to the rural site.
- impact on the character / openness of the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Area of Great Landscape Value (AGLV) due to scale and bulk.
- impact of the River Wey corridors visual setting
- loss of trees resulting in less visual screening.
- tree survey excluding trees on the embankment.
- impact on views from Hogs Back not considered
- Landscape and Visual Impact Assessment photos taken do not adequately show the impact as they use wirelines and not solid colour.
- deterioration and loss of the ancient woodland
- loss of habitat
- impact on biodiversity
- impact of the increased lighting on birds such as owls.
- removal of trees which provide habitat for bats, nesting opportunities for birds and foraging areas for badgers.

#### Heritage impacts

- impact on St Catherines Conservation Area.
- height and massing out of character with the conservation area.
- impact on the significance of the fourteenth century Chapel, sixteenth Century Piccard Manor and St Catherines Cottages, nineteenth and twentieth century buildings by notable architects and nineteenth century Victorian suburbs.
- impact on Grade II Braboeuf Manor.
- substantial harm to the setting of St Catherines Chapel which is Grade I listed
- harm to the Manors setting as a landmark building in the conservation area.

#### Design

- height size and massing of the development impacting views and vistas
- impact of construction works including noise and air pollution.
- overbearing impact out of scale with the local character
- more consideration to the materials and their colour
- overdevelopment.
- poor architectural quality of the proposals
- lack of employment uses.
- lack of consideration for the topography of the site.
- inappropriate architecture.
- lack of garden space
- lower density required.
- unimaginative design
- repetitive and generic design
- poor design of flat roofs

### Highways / access

- increased demand on transport infrastructure in the area including the existing poor bus service, and cycle network.
- poor access to the bus stop.
- poor public access by footpaths and particularly for wheelchair users and the elderly.
- increase safety risk to pedestrians.
- transport assessment fails to consider the location of the site and its connectivity in relation to the proposed extra care living use.
- lack of car parking provisions
- impact on Sandy Lane from a tree lined country lane to a conduit for high rise residential development.
- congestion to Portsmouth Road
- loss of footpath
- increase in ambulance, doctors food and parcel deliveries

### Planning policy

- does not meet the requirements for very exceptional circumstances for development.
- increase in footprint and bulk from the outline stage would cause substantial harm to the openness of the greenbelt.
- lack of consideration of the culminative effects of the proposal and Mount Browne Police Headquarters.
- failure to justify the location which is unsustainable.
- scale and massing should not be a reserved matters.

### Other

- lack of engagement with local stakeholders.
- significant changes of the scheme from initial consultation.
- lack of time for engagement other than through the internet.
- increase pressure on local schools, GP's, and other public facilities.
- limited public benefit including public realm enhancements.
- lack of detail provided regarding Zone 3.
- application hastily submitted resulting in poor preparation and consideration.
- more time required for scrutiny
- disingenuous/misleading consultation and PR exercises.
- clarification about the levels of occupancy and staff living on site.
- lack of clarification regarding a restaurant
- lack of 3D visualisation of the site available to the public.
- level of redaction of the viability assessment.
- appropriate conditions to be attached to permissions.
- lack of response/changes in response to public consultation
- misleading drawings
- Waverley Borough Council do not appear to be consulted and it would be visible from Godalming.
- implication of pre-determination by the council.
- inaccuracies and inconsistencies on the plans regarding the size of the buildings.
- lack of proposed housing to meet housing need (affordable)
- need for a GP surgery.

Four letters of Support have been received and raise the following summarised points.

- proposals support the drive for sustainability.
- help to meet local housing need.
- provide specialist homes for people over the age of 65
- scheme promotes inclusivity.
- good use of land.
- pleasing to the eye.

One letter has been received which neither object to or support the proposal.

### **Planning policies**

#### National Planning Policy Framework (NPPF):

Chapter 2. Achieving sustainable development

Chapter 3. Plan-making

Chapter 4. Decision-making

Chapter 6: Building a strong, competitive economy

Chapter 5. Delivering a sufficient supply of homes

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

#### Guildford Borough Local Plan: Strategy and Sites (LPSS) 2015-2034:

Policy S1 Presumption in favour of sustainable development

Policy S2 Planning for the borough - our spatial strategy

Policy H1 Homes for all

Policy H2 Affordable homes

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 A34: The University of Law, Guildford

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

Policy P6: Protecting important habitats and species  
Policy P7: Biodiversity in new developments  
Policy P9: Air quality and air quality management areas  
Policy P11: Sustainable surface water management  
Policy D4: Achieving high quality design and respecting local distinctiveness  
Policy D5: Protection of amenity and provision of amenity space  
Policy D6: External servicing features and stores  
Policy D7: Public realm  
Policy D8: Residential infill development  
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 D19: Listed buildings  
Policy D20: Conservation areas  
Policy ID6: Open space in new developments  
Policy ID10: Parking standards for new development

Surrey Hills AONB Management Plan (AONBMP) 2020- 2025

Planning Management Policies: P1, P2, P3 and P6.

Supplementary planning documents:

Thames Basin Heaths Special Protection Area Avoidance Strategy SPD  
Sustainable Design and Construction SPD  
Planning Contributions SPD  
Healthy Streets for Surrey  
Parking Standards for New Development SPD  
Residential Design SPG  
Landscape Character Assessment  
Green Belt SPD

**Planning considerations**

The main planning considerations in this case are:

- Environmental Impact Assessment
- The principal of development
- C2 housing need and supply
- Impact on the Green Belt
- Character, design, appearance, landscape and visual impact and the special qualities of the Surrey Hills National Landscape
- The impact on heritage assets
- Heritage harm v public benefits balancing exercise
- Archaeology
- Amenity of future occupants / living environment
- Highway / parking considerations

- Flooding and surface water drainage
- Impact on neighbouring amenity
- Environmental health matters
- Impact on ecology, nature conservation and biodiversity
- Impact on trees and ancient woodland
- Climate change and sustainability
- Thames Basin Heath Special Protection Area
- S106 legal agreement requirements
- Final balancing exercise
- Overall planning balance and conclusion

### **Environmental Impact Assessment**

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 determines whether there is a requirement for an EIA based on whether the development in question is EIA development as defined by the 2017 Regulations. The proposal comprises an urban development project which would include less than 150 dwellings though the overall development site exceeds 5 hectares and as such is considered Schedule 2 development. The requirement for EIA depends on whether the proposed development would have the potential for significant environmental effects, the site falls within a Sensitive Area.

It is concluded, having regard to the selection criteria within Schedule 3, that the proposed development, in combination with other projects in the area, would not result in any significant cumulative environmental impacts that cannot be dealt with through planning conditions and/ or planning obligations. The proposal is not EIA development.

An EIA screening opinion was issued under reference 23/S/00003, the opinion was based on previous proposals for up to 200 use class C2 (extra care) units and up to 180 use class C3 (residential) units. The opinion concludes that the proposal was not EIA development. It therefore follows that the current proposals for significantly reduced development of 131 use class C2 (extra care) units and 1 use class C3 (residential) unit would not constitute EIA development.

### **The principle of development**

#### **Re-use of brownfield land**

The application site currently vacant and has been since summer 2024. The University of Law have vacated the site and they no longer retain an interest in the site. The existing buildings are all unoccupied and while the site is secure, it is now starting to fall into disrepair.

Paragraph 124 of the NPPF states that (inter-alia): ‘planning policies and decisions should:

a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside.



b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

The proposal would re-use brownfield land for housing and would remediate a site which is now in the very early stages of becoming degraded and derelict through lack of use. The proposal would also, at the same time as providing additional dwellings, give public access to the grounds which are located within the Surrey Hills National Landscape. The redevelopment of the site is considered to be compliant with this important aspect of the NPPF and would result in the redevelopment and the efficient use of previously developed (brownfield) land.

#### Local Plan allocation

The northern part of the application site, where the current surface level car park is located, is allocated through the Local Plan (Policy A34) for approximately 120 student bedspaces. The allocation was reflective of the position at the time that the University of Law would be maintaining their presence in the borough and that additional on-campus accommodation for students would be required in the future. However, as is now known, the University of Law has now vacated and sold their interest in the property. Given the location of the site, is deemed to be extremely unlikely that a new educational operator could be found for the site. While the premises are located relatively close to the town centre nevertheless the site is not directly connected and is a good walk away. Most educational operators are now favouring more urban, town centre locations for new premises. In addition, the existing buildings on the site are in need of significant investment and renovation which may again severely limit their attractiveness to educational operators. The loss of the education use will be considered in more detail in the next section of the report.

It is noted that technically the proposal does not have any impact on the parcel of land (i.e. the surface level car park) which is allocated for student housing through the Local Plan. There is no development proposed here and the existing car park would remain to partially serve the scheme. However, it is fully acknowledged that approving a large C2 development would mean that achieving the allocation would be extremely unlikely. However, given the fact that the former education use has now ceased and is unlikely to resume (as will be discussed below), the resulting likelihood of non-compliance with the allocation should be afforded limited weight in the assessment of the proposal.

It is further noted that the allocated student accommodation was to serve the direct needs of the University of Surrey and not the wider supply of accommodation for the town. Ample student accommodation has and is coming forward around the University of Surrey campus and elsewhere in the town centre to cater for the needs of educational institutions which remain operational. As such, allocation A34 not coming forward would have no material impact on the supply or availability of appropriate student accommodation in the town.

### Loss of education facility

As mentioned above, the University of Law vacated the site in July 2024. The Council has no powers to force the continued use of the premises for educational purposes, this would be a decision left to the market.

Policy ID7 of the LPDMP states that 'community facilities will be retained for the benefit of the community and development proposals resulting in their loss or change of use will be resisted unless it is demonstrated that: a) adequate alternate provision exists or a replacement facility of an equivalent or better standard is to be provided in a location equally or more conveniently accessible to the facility's current catchment area; or b) there is no longer a need for the facility in its existing or alternative community use and its retention for such uses has been fully explored without success'.

The planning application has been submitted with a report which sets out how the possible use of the site for education has been marketed. This was conducted by Gerald Eve who are a UK based property consultancy. The report notes that Gerald Eve were instructed to identify an education occupier for part or the whole of the site. Marketing commenced on 25 August 2022, with a mailout to a mailing list of 50 parties including; UK wide education groups, local education groups, SEN operators, university and college operators and international schools. This was then followed by additional marketing campaigns, including an advert in the Estates Gazette.

As a result of the marketing campaign the report notes that a total of 47 enquiries were received as follows; 30 enquiries from residential developers/agents, 12 enquiries from care operators /investors / agents, two office developers / agents and three educational operators / investors. Despite some interest from education uses, it is noted that the majority did not formulate into any material interest due to locationally not being quite suitable, demographics not quite being sufficient and the increasing build costs adversely impacting development viability. Of the three enquiries from educational uses it is noted that one originated from a large local University who did not follow up with any firm interest. Of the other two parties, one was an educational investor, and they confirmed later in the process that they were no longer interested in the site and the final party was a special educational needs operator who later confirmed that the property was too large for their needs.

As a result, the report on marketing has concluded that there is no interest in the site for on-going educational purposes. Officers have no reason to doubt this conclusion and therefore the possibility of retaining the use has been explored without success in accordance with policy ID7 of the LPDMP.

### Proposed C2 uses

As noted above, the proposal is for the creation of 131 C2 units. It is noted that Use Class C2 of the Use Class Order 1987 (as amended) is for the use as residential institutions. The full description is use for the provision of residential accommodation and care to people in need of care (other than a use within class C3 (dwelling houses)). It is further noted that "care" for Use Class C2 is defined as '*personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder, and in class C2 also includes the personal care of children and medical care and treatment*'. It is clear from the definition above that a use

within Class C2 should include both a residential element and a care element.

Given the assessments above regarding the allocation and the loss of the existing education use, there is no in principle objection to the creation of C2 units on this site. However, the proposal would still be subject to a detailed assessment in terms of its individual suitability for the site and its resulting impacts. These will be considered in detail below.

As C2 units would not trigger an affordable housing contribution as part of the development, the Council has asked for further clarification on how the proposal will be operated as a C2 facility and not as individual private or rented residential dwellings which would be more akin to traditional C3 housing which would in turn trigger an affordable housing contribution.

It is noted that the applicant is a well-established provider of C2 accommodation with other scheme built and operational in the wider London area.

There is no definitive categorisation of the 'extra care' or a 'care' model of provision and so this will fall to be determined as a matter of fact and degree in each individual case. To assist in further defining what constitutes C2, guidance notes issued by the government and professional bodies are helpful.

The Department of Health Extra Care Housing Toolkit defines extra care as "purpose-built accommodation in which varying amounts of care and support can be offered and where some services and facilities are shared". The RTPI Good Practice Note 8 (Extra Care Housing: Development Planning, Control and Management) (2007) Housing LIN (Planning Use Classes and Extra Care Housing, Learning and Improvement Network) (2011) define extra care in line with the toolkit definition above.

From the above statutory definitions and primary guidance, the key characteristics of C2 use (whether that is extra care or care) are:

- purpose built accommodation;
- providing levels of care; and
- some services/facilities being shared.

The applicant notes that their product Elysian's provides an integrated care facility with communal facilities designed to encourage social interaction through the provision of onsite catering and care / treatment facilities outside of each individual self-contained unit. The proposal will also include flexibility to meet individuals' changing needs, allowing the level of care to be tailored in order to meet any changing need.

Should planning permission be granted, it is proposed that planning obligations will be secured within a Section 106 Agreement which restrict the occupation of the development. It is proposed that this obligation would restrict occupation to only persons who are 65+ years in age, and by reason of their age have an existing or foreseeable need for the type of care that is offered at the development.

In addition, it is proposed that the Section 106 Agreement would also:

- require a pre-occupation health assessment to be undertaken for each resident to establish their care and support needs and to carry out further health

assessment periodically during their residency.

- require the provision of a minimum of two hours per week of personal care services to each resident which will be secured in each leaseholder contract.
- require the provision of a care office and care trained staff on site 24 hours a day for the benefit of the residents. These facilities and services will be secured in each leaseholder contract. An applicant run CQC registered domiciliary care business will be operated from these offices and is a central part of the business model.

The above legal agreement requirements reflect the advice and guidance provided by the Associated Retirement Community Operators (ARCO) who the applicant are a member of and have provided input into the guidance.

Taking into account all of the above and in light of the measures which would be secured through the legal agreement, Officers are content to conclude that the proposal would fall within use class C2 of the Use Class Order.

Given all of the above, there is considered to be no in principle objection to the proposal, subject to compliance with the development plan when read as a whole.

## **C2 housing need and supply**

### **General housing supply**

Paragraph 60 of the NPPF states that 'to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay'. Paragraph 63 goes on to note that 'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disability, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)'.

The Council is able to demonstrate a five-year housing land supply. This supply is assessed as being 5.94 years based on most recent evidence as reflected in the GBC Five Year Housing Land Supply Position - factual update December 2024. In addition to this, the Government's latest Housing Delivery Test indicates that Guildford's 2022 measurement is 171%. For the purposes of NPPF footnote 8, this is therefore greater than the threshold set out in paragraph 79 (75%). Therefore, the Plan and its policies are regarded as up-to-date in terms of paragraph 11 of the NPPF.

While the supply of housing is mainly concerned with use class C3 dwellings, C2 units can also be counted towards the Borough's housing supply. In this case, 1.8 C2 units equal one C3 unit and as such, the proposed scheme would add 73 units to the five-year housing supply. As such, the proposal would make a meaningful contribution to the Council's housing supply.

### Specific C2 supply

Policy H1 of the LPSS builds on the NPPF and provides guidance on the supply of a variety of housing types and forms within the borough. Policy H1(5) states that 'the provision of well-designed specialist forms of accommodation in appropriate sustainable locations is encouraged, taking into account local housing needs'.

Whilst the Council does not have a target for C2 accommodation or specialist housing in the Local Plan, the need for this type of housing in the borough is fully recognised. The Surrey County Council publication entitled 'Planning profile for accommodation with care for older people Guildford Borough' dated April 2024, confirms that there is a current need for 427 market extra care units in the Borough. By 2035, Surrey County Council explains that this need is projected to increase to 501 units.

While the figures below take into account some current facilities (such as Dray Court, Japonica Court, The Clockhouse and Pond Meadow), they do not reflect the fact that 65 nursing bedspaces have been delivered as part of a Local Plan allocation in Worplesdon (Keens Lane), as well as approval for 100 C2 units as part of the former Wisley Airfield development. Even with these two developments factored into the figures, there is still a large, evidenced need for more market extra care units within the borough to meet the demands of an ageing population.

The proposal would provide specialist accommodation designed for the borough's older population. Based on an expected occupancy rate of 1.4 persons per unit, the development would have a population of approximately 184 people who would have access to 24-hour personal care in units which will be adaptable for all stages of life and mobility.

The boost in the supply of 131 market extra care units, which would provide an additional layer in the supply of specialist housing in the borough would be a substantial positive benefit to the Council's ability to supply a wide range and mix of house types for the whole community, including those older members of the community

Officers conclude that the boost in the supply of 131 market extra care units would be a substantial positive benefit to the Borough's ability to supply a wide range and mix of house types for the whole community.

### **Impact on the Green Belt**

The previously developed area of the site is inset from the Green Belt though the site is otherwise surrounded. The Green Belt boundary follows the footprint of existing development on site. As such, the undeveloped areas of the site, those areas to site boundaries and between zones 2 and 3, remain within the Green Belt.

The area of Green Belt to the east of the site, the grassland and meadows between the developed area and Portsmouth Road, are to be publicly accessible as a result of proposals. The remainder of the Green Belt on site, to the south and west of the listed building, will be accessible to residents only. The NPPF, at paragraph 154, confirms that within the Green Belt, the provision of appropriate facilities for outdoor recreation, as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it, should not be considered inappropriate.

The purposes of including land within the Green Belt are:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The introduction of access to the on-site Green Belt for residents and the public will not act to impact the openness of the Green Belt nor conflict with its purpose.

The built form proposed is to be within the existing developed areas of the site which are in-set from the Green Belt. The proposals do not constitute development within the Green Belt.

In this regard, the proposal is considered to be consistent with the NPPF and Policy P2 of the LPSS.

### **Character, design, appearance, landscape and visual impact and the special qualities of the Surrey Hills National Landscape**

The NPPF in chapter 12 promotes 'achieving well designed and beautiful places.' Paragraph 135 is applicable and states that planning decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Paragraph 139 requires significant weight be given to:

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes; and/or
- b) outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Policy D1 of the LPSS is also relevant and seeks to ensure that all new developments achieve high quality design that responds to distinctive local character, creating places with a clear identity, easy to navigate, with natural security and attractive overlooked streets and spaces.

Policy D4 of the LPDMP provides further detailed design guidance. Amongst other things, it notes that development proposals are required to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place. Development proposals should respond positively to:

- a) the history of a place;
- b) significant views (to and from);
- c) surrounding context;
- d) built and natural features of interest;
- e) prevailing character;
- f) landscape; and
- g) topography.

Policy D4 goes on to note that development proposals are expected to demonstrate high quality design at the earliest stages of the design process, and then through the evolution of the scheme, including in relation to:

- a) layout - settlement pattern of roads, paths, spaces and buildings, urban grain, plot sizes,
- b) building patterns, rhythms and lines
- c) form and scale of buildings and spaces - height, bulk, massing, proportions, profile and
- d) roofscapes
- e) appearance
- f) landscape - landform and drainage, hard landscape and soft landscape
- g) materials
- h) detailing

Development proposals are also required to reflect appropriate residential densities that are demonstrated to result from a design-led approach taking into account factors including:

- a) the site size, characteristics and location;
- b) the urban grain of the area and appropriate building forms, heights and sizes for the site;
- c) the context and local character of the area.

Development proposals are expected to make efficient use of land and increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting.

The place and architectural character that would be created by the layout and design of the scheme are examined below.

It should be noted that Pound Cottage, the existing dwelling sited to the front of the site at the junction with Old Portsmouth Road and Sandy Lane, is to be retained as existing. Proposals are limited to refurbishment and are considered appropriate. Considering the Cottage's position, distinct from the remainder of development proposed, and the limited works proposed, it does not feature in the consideration of character, architecture or

landscape impact provided below.

### Architectural design, bulk, scale and massing

It is noted that the site as existing is characterised by the Manor House and ancillary buildings in addition to more modern built development of up to three storeys high associated with the University of Law and situated within the central and western areas of the site. Existing built form is set within a verdant landscape comprised of parkland, woodland and grassed slopes.

Development in the proposed scheme is similarly concentrated to the central and western areas of the site and within areas already developed. Development increases in height from the south-west as does the topography of the site. The buildings in proximity to the listed Manor House and associated ancillary listed buildings are lower in height, scale and massing. These buildings include the new two-storey pavilion building at Block A, to be built into rising ground. The proposed part two, part three-storey Block B proposed to be located to the north of, though separate from, Braboeuf Manor (on land presently occupied by the administration building). And, Block D, the part two, part three-storey building to be located to the south of Braboeuf Manor (on land currently occupied by the Denning building). These buildings are considered to be of an appropriate scale and height and in keeping with existing built form.

The development proposed then gradually increases in height towards the south-eastern extent of the site. Block G is to be broadly located on ground currently occupied by Fountain Court, with the tallest buildings proposed, Blocks H and J, to be roughly in the same position and to the south of the existing Learning Resource Centre.

The access route through the site which runs from the site entrance to surface level car parking to the north-west, continues to the rear of the Manor House to reach the western-most building (at present the Learning Resource Centre), and from which point to the north, stepped access is available to the surface level car park, is to be retained. The route to the rear of Block B and the Manor House would be accessible by residents only and be flanked by buildings which would be between a single storey and 5 storeys in height.

Newly proposed buildings would be relatively large structures (broadly comparable in scale to buildings they are proposed to replace), with significant footprints albeit in the main, it is recognised that they would be located within, or in close proximity to, the footprints of existing buildings on site. Proposals would result in additional buildings on site in comparison with the existing situation in regards Block A, in Zone 1, and Block J, in Zone 2 and to the south-western most extent of the site. Both would be located on ground which is currently undeveloped.

It is acknowledged that a number of concerns have been raised by the public regarding the increase in built form on site, the height of the proposed and the resulting impact on the surroundings. It is important to recognise that since most of these comments were received, and further to officer negotiation, the application has been amended. Design changes are considered positive regarding massing and developable areas and act to materially change the impacts of the scheme.



Key amendments include:

- Number of units in Zones 1 and 2 reduced from 145 to 131.
- Massing of all buildings reduced, with removal of pitched roof architectural style in lieu of flat roof buildings.
- Existing surface carpark retained to provide parking for zones 1 and 2 (formerly proposed to be developed in outline as Zone 3. The outline planning component has been removed from the planning application in its entirety leading to a greater number of retained trees within the western site area.)
- Buildings that engage with heritage assets are now a maximum of 3 storey.
- Height of buildings in zone 2 reduced from 6.5 storeys to a maximum of 5 storeys.
- The height of Blocks H and J have reduced by 3m.
- The height of Block G reduced by 6m.
- Zone 2 further reduced development footprint and number of plots.
- Plot D further articulated to breakup massing.
- Developed building footprint in Zones 1 and 2 reduced by 2.5%.
- Reduced footprint to Plot A.

With the removal of all proposals for Zone 3 from the application, concerns previously raised have been fully resolved

### Zone 1

Within Zone 1, the proposed Block A has been architecturally redesigned, including a reduction in width and revisions to elevation treatment including material palette. Improvements to landscaping are also being shown including the repositioning and reduction to the adjacent car parking area and manipulation and grading of levels surrounding the proposed structure. The actions which have been taken are welcomed, with the redesign seen more positively than the previous proposal by virtue of the fact that it would appear more embedded and connected to its context, utilising and sculpting the existing topography so that it appears as a single storey structure that positively addresses both the Manor, its formal garden and the historic driveway.

The proposed block B has similarly been architecturally redesigned, including a revised roof form and revisions to elevational treatment including material palette. The actions which have been taken are welcomed and are seen as a significant improvement, with the redesign seen more positively than the previous proposal by virtue of:

- its simple recessive design, both in elevational expression and roof form,
- the rational utilisation of a palette of simple and restrained facing materials, that blend and complement the colours, tones and textures of the Bargate stone and slate used in the construction of the Manor, and which sit contextually within the sites parkland context.
- the integration of balcony elements within the building envelope that streamlines the buildings architectural composition and removes clutter and distraction.

The proposed block D has also been architecturally redesigned, including a revised roof form and revisions to elevational treatment including material palette. The actions which have been taken are welcomed and again, are seen as a significant improvement, with the redesign seen more positively than the previous proposal by virtue of:

- its simple recessive design, both in elevational expression and roof form,
- the rational utilisation of a palette of simple and restrained facing materials, that blend and complement the colours, tones and textures of the Bargate stone and

slate used in the construction of the Manor, and which sit contextually within the site's parkland context.

- the integration of balcony elements within the building envelope that streamlines the buildings architectural composition and removes clutter and distraction.

## Zone 2

This area now consists of three blocks G, H & J which step up into the valley as opposed to the four blocks previously proposed. These architecturally coherent blocks have undergone a full redesign which, as above, includes, an overall reduction in height (blocks H and J reduced by 3m and block G reduced by 6m) and revisions to floor plates and modulation that better address the walled garden and landscape forms whilst improving opportunities for residential units to be dual aspect. The actions which have been taken are welcomed, with the redesign seen more positively than the previous proposal. It is considered that more care has been given towards providing contextually appropriate massing and height. Nonetheless, there is still a degree of concern with the overall scale of these blocks as individually and cumulatively they do not reflect the character of the site or context of the area, nevertheless there is acknowledgement that the proposed scale does allow for an effective and efficient use of a brownfield site.

Whilst it is acknowledged that the proposed Blocks G, H and J are taller and bulkier than the existing (where relevant), it could be said that the design does respond to the context of the site and that particular care has been given to massing and heights. These taller blocks are situated away from the more sensitive, historic area of the site concentrated around the listed Braboeuf Manor and its ancillary listed buildings. The new blocks of increased height would be sited to the west of the site with proposed storey heights rising in line with site levels. Levels continue to rise steeply to the north, south and west in the areas adjacent to Blocks G, H and J, with proposals for the blocks to similarly raise in height from the east to the west.

The taller buildings proposed would be set in the context of rising ground in the least sensitive part of the site and where 'height' is more likely to be accommodated with reduced harm. In this context it is not considered that the proposal would be so out of place that a reason for refusal on these grounds could be justified.

While it is acknowledged that some of the proposed buildings would be larger than the ones they would (where relevant) replace, to reaffirm, Paragraph 135 of the NPPF seeks development that is sympathetic to the environment, but it is noted that this should not discourage appropriate innovation or change (such as increased densities). The proposed scale and size of the buildings allows for an effective use of a brownfield site within a sustainable location. The introduction of additional built form and height on site need be considered in the context of the existing site condition.

With reference to materiality, material palettes are proposed to differ slightly between zones. Within Zone 1, the palette of materials selected has the aim of complementing the Bargate Stone used to construct Braboeuf Manor. Materials are of a restrained palette, with warm grey brick masonry, dark grey windows and timber panels proposed. In Zone 2, brown brick masonry, dark grey windows and profiled timber panels are proposed to complement the wider development whilst marking a change in setting.

While the proposed zones share a consistent theme they are differentiated through materials with the use of colour, detailing and glazing etc. Materials have been selected to provide architectural relief to elevations. Proposals ensure that the development is not interpreted as homogenous, but as a series of individual blocks which share a common theme whilst providing subserviency to the Manor's backdrop and the surrounding landscaped setting.

In addition, the landscaping, open spaces and retention of historic features such as the Manor House and walled garden, help to enrich and raise the architectural quality of the scheme as a whole. Proposed buildings are of a much better quality than those they would replace.

Whilst materials would all be controlled by planning condition, the material strategy as set out for the proposed scheme is well considered and complementary to the prevailing palette observed both immediate to the site and more broadly within the surroundings. Proposals are considered to contribute markedly towards creating a well-designed scheme which has a positive and coherent identity.

The Council's Urban Design Officer has reviewed the architectural amendments made to the scheme and welcomes the design revisions made, confirming that they have largely overcome those issues previously identified. However, they still note a concern regarding the overall scale of proposed blocks G, H & J, stating that both individually and cumulatively they do not reflect the character of the site or context of the area. This concern will be considered in the overall balance below.

### Layout

At present, the existing site is comprised of a number of vacant buildings of varying design. The proposal would allow for the redevelopment and reuse of the site. Proposals are reflective of the existing site layout with new blocks, in the main, to be sited within or in proximity to the footprint of existing built form.

Similarly, movement through the site is broadly proposed to be retained as existing albeit with the introduction of public access to the parkland to the eastern site boundary. For residents, routes through the site would echo those previously used by university students. Though in consideration of local topography and the notable level changes on site, the applicant has proposed access and circulation routes via ramps within proposed buildings to address level changes.

Open spaces within the scheme have clearly been carefully considered by the applicant. Aided by the introduction of the valet parking scheme and concierge facilities to limit on-site delivery traffic, the main route through the scheme, as accessed between Blocks A and B and continuing to the rear of Block B and the Manor House to the south-western extent of the site, would primarily be used by pedestrians. Whilst retaining the existing alignment of access routes, views to the Manor House are retained, enhanced by sympathetic landscaping proposals. Moving through the site, Blocks are adjacent to the access route with active elevations.

The eastern, central and western extents of the site would have contrasting characteristics. To the east publicly accessible retained parkland is to offer quiet space for leisure and reflection. To the centre of the site, Block A is to offer a restaurant with

roof terrace catering to both public and residents with a wellness centre and pool for residents. The repurposed Manor House fronting onto the formal lawn, is to serve the administrative requirements of the site and provide communal facilities. To the west development is to be accessible to residents only and home to a concentration of residential units set amongst gardens and courtyards.

In all, through the layout, the provision of new and enhanced areas of open space and the architecture and detailing, the proposed scheme would create its own strong sense of place, whilst also successfully integrating with its surroundings. The quality of the proposals in regards materials and hard and soft landscaping would be secured by condition.

While it is acknowledged that the proposal would redefine the existing site and would, to a limited extent, introduce built form on land currently devoid of buildings, the development is considered to have been sensitively designed to reflect the nature and character of its surroundings. Higher buildings have been positioned in less sensitive areas of the site and take advantage of existing topography (the impact on wider views is considered elsewhere within the report). The quality of the architecture, the detailing of the buildings, as well as improvements to permeability and open space will help the development to assimilate into its surroundings. It is acknowledged that the Council's Landscape Consultant, Urban Design Officer and AONB Planning Advisor have raised concerns regarding the proposed development, especially so in regard to proposals within Zone 2 and the overall scale of proposed blocks G, H & J, stating that both individually and cumulatively they do not reflect the character of the site or context of the area. This concern will be considered in the overall balance below.

#### *National Landscape and exceptional circumstances*

Areas of Outstanding Natural Beauty (AONBs) have been renamed as National Landscapes to highlight the importance of the sites. Any reference to Areas of Outstanding Natural Beauty within policy should be construed as a reference to National Landscapes.

The site in its entirety sits within the Surrey Hills National Landscape and Area of Great Landscape Value. Paragraph 182 of the NPPF requires 'great weight' to be given to conserving and enhancing landscape beauty in Areas of Outstanding Natural Beauty, requiring the scale and extent of development within an AONB to be limited. Development within this setting is to be sensitively located and designed to avoid or minimise adverse impacts on the designated area.

Paragraph 183 of the NPPF confirms, 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 continues, 'consideration of such applications should include an assessment of:

- c) 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;
- c) 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.

It is accepted that proposals would result in major development within the National Landscape and as such the application must be assessed as per Paragraph 183.

*c) The need for development*

LPSS Policy H1 confirms, 'well-designed specialist forms of accommodation in appropriate sustainable locations is encouraged, taking into account local housing needs'. Supporting paragraph 4.2.4 acknowledges that the Borough has an aging population with a significant projected growth in the over 65 year-olds and that there is an estimated need for 1,061 specialist accommodation units for older people over the plan period (2015-2034), as identified in the SHMA.

The application is supported by a Statement of Need for Specialist Housing which sets out that the current estimated supply of specialist housing for older people in Guildford falls short of projected demand. The assertion aligns with Surrey County Council's April 2024, 'Planning Profile for Accommodation with Care for Older People within Guildford Borough', which demonstrates that there is a need for an additional 501 units of market extra care housing up to 2035.

Noting the above, it is acknowledged that there is demonstrable need for the C2 accommodation proposed.

*c) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way*

Allocations for use Class C2 accommodation within the Borough as provided for within the Local Plan are limited to one. Policy A1 of the LPSS is relevant and allocates land at 'The Plaza, Portsmouth Road' for 90 C3 dwellings or accommodation for older people (Use Class C2). While development of the site, which was secured by way of planning permission issued in March 2018 for 100 apartments for assisted living accommodation, this will not be delivered as a subsequent permission for co-living was approved and is currently being built out.

In consideration of this demonstrable need, and mindful of the planning constraints within the Borough with 80% of land comprising of Green Belt, provision of C2 accommodation on a previously developed and currently vacant site is considered appropriate.

*c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

In regards recreational opportunities, the development proposed would result in enhancement. The site is at present wholly private with no public access. As part of the proposals the north-eastern extent of the site will be accessible to the public through the introduction of a pedestrian connection to the North Downs Way, the Parkland area to the east of the site will be publicly accessible providing amenity green space and, a publicly accessible restaurant is to be provided.

The impact of proposed development on the environment and landscape are considered acceptable subject to the mitigation measures as detailed elsewhere in this report.

### Exceptional circumstances

In addition to consideration of points a) to c) as above, it is important to note, as per the supplementary 'Exceptional Circumstances and Public Interest Assessment' document submitted in support of the application, that the existing condition of the site is noteworthy in this context.

The Surrey Hills AONB was designated as early as 1958, the more modern buildings on site, developed to serve the educational requirements of a law college, post-date the designation. A former university campus which has been developed over-time in a unique vernacular, the campus as existing is comprised of a sizeable green and verdant site within which sit large buildings, with the more modern utilitarian in nature.

Policy A34 of the LPSS allocates land at the north-western extent of the site, currently comprised of the surface level car park, for the development of approximately 112 units of student accommodation. The allocation acts to confirm that redevelopment of, at least a portion of the site, would be acceptable in principle. To confirm, the allocation was made in spite of the site's location within the National Landscape.

Unlike the vast majority of land within the National Landscape designation, the site is sustainably located and comprised of previously developed land as defined by the NPPF. The site's brownfield nature is relevant to the consideration of "exceptional circumstances" especially regarding the test at Paragraph 183(c). The existing, more modern buildings on site which do not contribute to heritage value are considered to detract from the natural beauty of the National Landscape. Proposals include for the demolition of these structures and their replacement with development considered more appropriately and sympathetically designed in reference to the locality.

Existing development footprints have sought to be adhered to as much as possible and, where new development is proposed to extend into currently undeveloped land, proposals are considered.

Built form on the site is, in its entirety, proposed to be located within areas of the site inset from the Green Belt. The remainder of the site, approximately 40% remains within the Green Belt. Green Belt areas of the site are currently undeveloped, and of a 'wooded' character. This will remain the case as proposed with landscape features to be retained and enhanced.

### Public interest

As above, Paragraph 183 of the NPPF confirms that within a National Landscape, permission should be refused for major development other than where it can be demonstrated that the development is in the public interest.

In addition to providing Use Class C2 accommodation to meet a recognised need, repurposing a brownfield site and providing for enhancements in public access and recreational facilities, proposals would allow for the refurbishment of heritage assets in Braboeuf Manor, and associated curtilage listed buildings. Buildings that are formally recognised as being of special architectural and historic interest. Proposals for improvements to the highway and PRoW are also considered to be of public benefit.

## Summary

Proposals have been assessed as required by the NPPF. Whilst it is acknowledged that proposals would result in major development within a National Landscape, it is considered that exceptional circumstances can be demonstrated as can public interest.

### Furthering the purpose of protected landscapes

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 that 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, must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.

Both Natural England and the Surrey Hills AONB Planning Advisor have asked that the LPA be satisfied that the applicant has complied with this greater duty.

The Applicant has provided a supplementary statement confirming the measures proposed to demonstrate these duties have been met. Proposals include the planting of a substantial number of trees, the active management of woodland and landscaping proposals informed the wider National Landscape character with biodiversity net gain to be achieved.

Built form is to be in materials in keeping with local character with the impact on the immediate setting of Braboeuf Manor improved by the removal of the existing administrative block which currently wraps around the Manor to be replaced with a building set back from the Manor and subservient in height, bulk and scale.

The proposal also allows for the erection of an educational signboard which would be used to educate the users of the adjoining PRoW of the special landscape qualities and beauty of the National Landscape. This signboard would be in the public interest and its location, design and content would be agreed through condition.

Bespoke timber seating is also to be provided. Sited within the publicly accessible parkland on-site this would allow for visitors to pause and enjoy the beauty of the National Landscape. The seating would be in the public interest its location and design would be agreed through condition.

Through the implementation of measures as detailed above, 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.

### National Landscape and wider character

Policy P1 of the LPSS is relevant and confirms, development proposals within the AONB will be assessed against the provisions of the Surrey Hills AONB Management Plan. The Management Plan (2020 – 2025) sets out a vision for the conservation of the natural beauty of the Surrey Hills landscape. The need to maintain the social and economic viability of the Surrey Hills in a sustainable manner is recognised and development

management policies introduced with the aim of enhancing local character and the environmental quality of the nationally important setting.

Policy P2 of the Management Plan states, *'development will respect the special landscape character of the locality, giving particular attention to potential impacts on ridgelines, public views and tranquillity. The proposed use and colour of external building materials will be strictly controlled to harmonize within their related landscape and particularly to avoid buildings being incongruous. In remoter locations, with darker skies, development proposals causing light pollution will be resisted'*. Whilst policy P6 confirms, *'development that would spoil the setting of the AONB by harming public views into or from the AONB will be resisted'*.

Policy P3 is concerned with design confirming proposals will be required to be of high quality, respectful of local distinctiveness and complementary in form, setting, and scale with their surroundings, and should take any opportunities to enhance their setting. These policy aims are echoed within the LPSS at Policy D1 and reinforced by Policy D4 of the LPDMP which sets out that development proposals are required to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place. Development proposals should respond positively to:

- the history of a place;
- significant views (to and from);
- surrounding context;
- built and natural features of interest;
- prevailing character;
- landscape; and
- topography

The Surrey Hills AONB Design Guide provides high-level guidance for new development within the AONB and includes reference to:

- respecting the pattern of the settlement, its open spaces and greens
- avoiding development on skylines, prominent spurs and open slopes
- complementing the scale, height and proportion of existing buildings
- celebrating the architecture, detailing and material of local context
- retaining existing trees wherever possible and using native varieties in new planting
- minimising the impact of vehicular access / parking and to increase footpath access between settlement and countryside.

Also relevant to the landscape impacts of this proposal is the Guildford Landscape Character Assessment (GLCA). A technical assessment and 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.

The application site lies within the Guildford Landscape Type L Open Greensand Hills, Landscape Character Area. Within the L1: Shackleford Open Greensand Hills and Rural-Urban Fringe Character Area. And, within L1: Braboeuf Manor-Mount Browne Rural-Urban Fringe.



Key positive landscape attributes of these areas that should be conserved and enhanced include:

- distinctive landform with wooded slopes and agricultural valley;
- the historic routes of The Pilgrims Way and North Downs Way and Wey crossing;
- St. Catherine's Hill and Chapel, plus views to and from this landmark feature;
- local views to the wooded hills to the east of Guildford (The Chancies);
- function in providing an intact rural landscape between Guildford and Godalming;
- the historic buildings and features associated with the estates (Conservation Area);
- the narrow rural lane - Sandy Lane.

Whereas the overall management aim of the Landscape Strategy in this area is to conserve the rural character and high-quality landscape of the Braboeuf Manor - Mount Browne Rural-Urban Fringe and its role in providing the setting and containment to Guildford and creating an intact rural landscape between Guildford and Godalming.

### LVIA

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 in line with best practice guidance as set out in the Guidelines for Landscape and Visual Impact Assessment (Third Edition) 2013 (GLVIA3).

The general location of views from within the study area are as discussed and agreed with the local planning authority. Eight representative viewpoints have been selected to assess the effects on visual receptors. Additional contextual views identified as Illustrative Viewpoints, have been identified within the Study Area, to *“demonstrate a particular effect or specific issues, which might, for example, be the restricted visibility at certain locations”* (GLVIA, 3rd edition, para 6.19).

Officers consider the LVIA to be important in assessing the wider impact of the proposal on its surroundings. However, it is stressed that any such view is, literally, a 'snapshot', and that buildings are experienced in their settings in a dynamic manner, as the observer moves around an area with different observers moving at varying speeds. Thus, whilst a key view could be adversely impacted by a proposal, it is important to appreciate that a slight repositioning of the viewpoint could have a very different result. Accordingly, it would be inappropriate to judge the impact of a proposed development solely via the LVIA process.

The LVIA concludes that in landscape character terms;

'There would be no significant effects on the host Landscape Character Area, LCA L1 'Braboeuf Manor – Mount Browne Rural-Urban Fringe' due to the existing development within the Site. The Proposed Development would result in a partial change in land use within the Site, where new buildings are proposed to replace currently undeveloped land, but the wider structure and character of the landscape of the Site, including ancient woodland and the general institutional character of 'buildings in a landscape', would be largely unchanged. It is also noteworthy that the Site is previously developed (brownfield nature), with the proposals partially replacing existing development within

existing built/ development areas. There would therefore be a Medium Scale of change within the western and central Site area, where the proposed zone 2 is located. Changes would occur in only a small part of the overall character area, so the extent will be Limited, and the existing landscape and Site character would prevail. Therefore, whilst an adverse effect on the LCA results from the proposals, this effect would not be significant and would be further tempered by elements of proposed mitigation such as the maturation of new tree planting and ongoing cyclical management of existing trees and woodland within the Site.'

As regards visual impact the LVIA finds:

'...there would be no significant effects on visual receptors within the Study Area. The primary permanent adverse visual effects would be on public rights of way (PRoW) users adjacent to the northern and western Site boundary, however this is not surprising given the adjacency between the receptor and Proposed Development Zones 1-3. The existing mature woodland within the Site provides the main screening with proposed woodland management and tree planting serving to limit adverse visual effects to non-significant. Similarly, whilst there would be potential visibility of the proposals from higher ground to the west, at Sunnydown, and to the east, at Pewley Down, the potential adverse effects upon visual receptors at these localities is also judged to be non-significant.'

Commentary specific to the viewpoints identified in the LVIA is provided below.

### Representative Viewpoints

#### Representative Viewpoint 1: View from St. Catherines Hill

The LVIA notes that views towards the Site comprise mainly dense tree cover along either side of the A3100 and within the Site. It is however noted that in winter a substantially screened view of the upper portion Braboeuf Manor is apparent.

Both medium term and permanent effects following completion of the proposed development are assessed to be of Negligible scale and Neutral. Officers agree with this assessment. The development would sit within the wooded context of the site and be of limited visibility.

#### Representative Viewpoint 2: View from Portsmouth Road/and Footpath Guildford 23

The view from the exiting site access and junction onto the A3100 would remain relatively unchanged. Given the topography of the site, existing trees and concentration of built form to the south and west of the site, development would remain heavily screened.

Both medium term and permanent effects following completion of the proposed development are assessed to be of Negligible scale and Adverse.

#### Representative Viewpoint 3: View from Footpath Artington 277- western Site boundary

As with the existing built form on site, zone 2 of the proposed development would be partially visible through the boundary vegetation from this location adjacent to the western site boundary.

Both medium term and permanent effects following completion of the proposed development are assessed to be of Medium scale and Adverse.

Representative Viewpoint 4: View from permissive footpath south of Bridleway Guildford 14

This view is from elevated land at 0.9km north of the site, within the AONB. The higher areas of Zone 2 of the Proposed Development would be partially visible within woodland in the middle ground. Development would remain below the wooded ridge of the Site.

Both medium term and permanent effects following completion of the proposed development are assessed to be of Small scale and Adverse.

Representative Viewpoint 5: View from A281- Shalford Road- adjacent to the River Wey Corridor

From this viewpoint, adjacent to Guildford Rowing Club, taller elements of the proposed development within zone 2, rooftops and upper storeys, would be visible within surrounding woodland, below the wooded skyline.

Both medium term and permanent effects following completion of the proposed development are assessed to be of Negligible scale and Adverse.

Representative Viewpoint 6: View from Footpath Guildford 26, south of Chantry Wood

The wooded context to the site would serve to predominantly screen and filter views of the Proposed Development. There is potential for glimpsed views of proposed taller elements of zone 2, which may be partially visible through the existing tree canopies. Views would remain largely unchanged.

Both medium term and permanent effects following completion of the proposed development are assessed to be of Small scale and Neutral.

Representative Viewpoint 7: View from within Pewley Downs Nature Reserve.

Proposed Development Zone 2 would be partially visible to the east of St Catherines Chapel lying within the existing woodland and below the wooded ridge and characterised by stepped massing, replacing views of elements of the existing law school building complex. The proposed development would form a small element of this viewpoint and therefore the view would remain largely unchanged for this receptor.

Both medium term and permanent effects following completion of the proposed development are assessed to be of Small scale and Adverse.

Representative Viewpoint 8: View lower footpath of Chinthurst Hill

There are very few locations with views northwards towards the site, this viewpoint includes PRow receptors along footpaths and permissive routes around Chinthurst Hill. The Proposed Development would be barely perceptible amongst the existing wooded context of Guildford.

Both medium term and permanent effects following completion of the proposed development are assessed to be of Negligible scale and Neutral.

### Assessment

The Council's Landscape Consultant has reviewed proposals and concludes, in regards development proposed within Zone 1, *'Evolution of the proposals in the immediate vicinity of the heritage asset of Braboeuf Manor is to be commended, as the importance and scale of this historic building has been respected in the design of the heights and massing of the proposed buildings at Plots A, B and D ...design in terms of scale and massing [of Plots A, B and D] is acceptable in landscape terms and has had due regard to the landscape setting of Braboeuf Manor.'*

The Surrey Hills AONB Planning Advisor similarly raises no concerns in regards the design of development within Zone 1, describing the proposed Block A as an *'attractive feature'*.

In regards proposals for Zone 3 which is to remain relatively unchanged with the retention of surface car parking as existing, comments confirm that amendments made since the submission of the application are noted and appreciated.

Concerns however remain regarding the design of the buildings in Zone 2. Whilst acknowledged that the principle of development in this Zone is not an issue, it is not considered that design responds positively to the steep topography and existing mature trees on-site and does not conserve and enhance the character of the Surrey Hills National Landscape.

The degree of harm to landscape character is not considered to be limited to the site but to have wider adverse effects on the National Landscape due to the site's visibility from a broad area by virtue to its sloping, and to its west, elevated topography.

In line with the findings of the submitted LVIA, development impact is considered particularly adverse for walkers on Footpath 277 along the northern site boundary (Representative Viewpoint 3). From this position and whilst it is acknowledged that the site is relatively well screened by perimeter trees and planting, there are some locations along the footpath that have close proximity, open views into the site. It is therefore accepted that, from this position, the proposal would result in harm to landscape character.

In long distance views, the key concerns raised by the Council's Landscape Consultant are that the proposed buildings in Zone 2 have the potential to be seen above the height of the surrounding trees, as the proposals would result in buildings higher than buildings currently on the site. However, in general, and as demonstrated within the LVIA, the development is set below the ridge line of the site boundary and would not mask or compete with wider views.

Whilst acknowledged that proposals would constitute a marked change in the landscape character of the site, with a greater intensity of built form, it is recognized that proposals would bring about some benefits in terms of additional planting, management of trees and enhancement of habitats.

The following measures are proposed to be secured via condition:

- Construction Environmental Management Plan (CEMP) - to ensure that potential landscape and visual effects arising from the construction period are adequately mitigated.
- Landscape Strategy - to minimise the visual effects of the development and enhance its location.
- Habitat enhancement – this is set out in greater detail below.

The recommended conditions are considered reasonable and would serve to partially mitigate identified landscape and visual harm.

The proposal would result in an increase in built form on the site and would include a number of buildings of a scale and bulk larger than the existing. It is acknowledged that the Council's Landscape Consultant, Urban Design Officer and AONB Planning Advisor have raised concerns regarding the proposed development, especially so in regard to proposals within Zone 2 and the overall scale of proposed blocks G, H & J, stating that both individually and cumulatively they do not reflect the character of the site or context of the area. This concern will be considered in the overall balance below.

However, with the exception of harm to the view along the footpath adjacent to the western site boundary (3) which is considered to be of medium scale and adverse in accordance with the submitted LVIA, impact on views is determined to be small scale or negligible. It is considered that mitigation measures as proposed would act to minimise the potential landscape and visual effects of development.

Officers consider that the proposal has been designed so that it would assimilate into the wider landscape in an acceptable manner. While the development would be visible from a number of vantage points, this does not in itself equate to harm. Notwithstanding this, the proposal would result in a moderate level of harm to the landscape. This harm will be balanced against the potential benefits of the scheme below.

To note, concerns have been raised within a public consultation response about the LVIA and how it has been presented. Officers have no concerns about the accuracy of the submitted LVIA and are satisfied that the methodology follows industry standards.

### **The impact on heritage assets**

As noted above, the application involves the change of use and modifications to Braboeuf Manor which is Grade II listed. Also on the site are a number of curtilage listed structures which include the Garden Cottage and its associated workshops, the walled gardens and summer house and Pound Cottage. The impact on the significance of these buildings and structures will be assessed below. The site is also located within the St Catherines Conservation Area.

There are a number of listed buildings which are not within the site boundary but whose setting could be impacted by the property. These neighbouring buildings are all Grade II listed and include 64 Portsmouth Road, The Ship public house and St Catherine's Priory and Cottages.

Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that 'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that 'with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.

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 balancing exercise.

Turning to 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'.

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'.

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.

Policy D16 of the LPDMP concerns designated heritage assets and it emphasises the requirements in the NPPF as regards the assessment of applications concerning heritage assets. Policy D17 relates to listed buildings and it notes that (inter alia):

- development proposals are expected to conserve, enhance and where appropriate better reveal the significance of listed buildings and their settings. Where harm to significance is identified this will be considered against Policy D16(3).
- repairs, alterations or extensions, that directly, indirectly or cumulatively affect the special interest of a statutory listed or curtilage listed building, or development affecting their settings are expected to: a) be of an appropriate scale, form, height, massing and design which respects the host building and its setting; b) have regard to the historic internal layout as well as the architectural and historic integrity that form part of the special interest of the building; c) reinforce the intrinsic character of the building through the use of appropriate materials, details and building techniques; and d) respect the setting of the listed building including inward and outward views.
- development proposals for the demolition/removal of objects or structures fixed to the building or within the curtilage of a Listed Building are required to demonstrate that they are: a) incapable of repair for beneficial use or enjoyment; or b) not of special architectural or historic interest as an ancillary structure to the principal Listed Building.

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.

#### Demolition of existing buildings

It is noted that the proposal involves the demolition of all of the existing teaching and administration buildings on the site. These are all twentieth century structures and include the administrative building which adjoins Braboeuf Manor, the Denning Building to the south of Manor, the Fountain Court and the Learning Resource Centre.

It is noted that the Twentieth Century Society have objected to the proposal and in particular to the objection of the existing buildings. They note that they should be treated as non-designated heritage assets in the assessment. The Council's Conservation Officer has reviewed all of the existing buildings and is of the opinion that none of them warrant being treated as heritage assets, either individually or as a group as their architectural and historic significance is not of a sufficient level to be considered as non-designated assets. The Conservation Officer notes that there are no concerns with the loss of these structures and it is an element of the application which can be fully supported.

#### Assessment of impact on significance – Braboeuf Manor

Braboeuf Manor is a statutory listed building (Grade II) that sits in an extensive plot to the west of St Catherine's Hill and Chapel. Its origins date to the early medieval period where the property formed part of the Manor of Arington and the Manor of Godalming.

This three storey Manor runs north to south, with its principal elevation facing to east, permitting views of the ruins of St Catherine's Chapel. The property that we see today evidences several phases of development in fabric and floor plan.

The earliest phase that is identifiable centres upon the fabric and structure to the north and east, and dates from 1586. It is understood that this was undertaken at the behest of the Rice Wight (d.1602), and replaced/remodelled a previous stone house, most likely a medieval hall house with central hearth. This Tudor structure is largely of timber construction, but some elements of the earlier stone house may have been incorporated within the north and west walls.

Further remodelling of the property was undertaken during the nineteenth century whilst the property was occupied by Jane More Shubb (1795-1868), whose first husband had been Major Arthur Wight (1787-1847). Firstly, c 1846, an extensive programme of renovation and extension was undertaken, which consisted of the Tudor timber framed house faced with Bargate stone; the addition of stone mullioned windows; a change of roof profile; the rebuilding of the porch and its gable; extensions to west elevation and the addition of a perpendicular linear wing to the south elevation. These Gothic stylised changes provide the structure and character which is currently evident.

The property's original landscape setting has seen alteration following the site's acquirement by the College of Law, with land and gardens to the north, south and west taken for the development of collegiate and administrative buildings. However, in contrast, the gardens and landscape to the east, together with the sinuous driveway have on whole remained unaltered.

In terms of the significance of the building, this can be summarised as follows:

- is a building of special interest as reflected by its Grade II listing status;
- survival of sections pre-sixteenth century stone walls;
- survival of historic fabric, structure features and floor plan of the C16th house which includes the timber frame core and the c.1680 oak staircase;
- nineteenth century additions and alterations illustrates the evolving form and expansion of the site;
- the nineteenth century Bargate stone facing which externally envelopes the timber



frames and the 'gothic' fenestration remodelling defines its current aesthetic appearance and provides a snapshot of changing fashions and styles in the higher levels of society between sixteenth and nineteenth century; and

- historical association with Manor of Artington and the Manor of Godalming and latterly the Wight Family and Lt. Col. J.A.C Younger.

The proposal would include a number of modifications to the listed building itself, both externally and internally, as well as new development within its setting.

With regard to the external and internal works to the listed building itself, these can be briefly summarised as:

- the demolition of the existing administration building which currently joins onto the listed building together with the associated works to make good. In addition, a new external opening would be created close to the existing;
- the demolition of part of the ground floor of the nineteenth century extension. The works will include the reconfiguration of the rooms by removing internal partitions and a small extension to the rear infill an existing undercroft area;
- works to remove the significant and various level changes within the building through the installation of ramps and in places, increasing the height of the floors; and
- other works include the removal of more modern partition walls and doorways.

In terms of the development within the setting of the listed building it is noted that the majority of the more modern former university buildings would be demolished as part of the development. The nature and extent of the proposed scheme has already been set out in detail above, so this will not be repeated here, but as a brief reminder, a total of six new buildings are proposed which are located to the north, north-east, south and south-west of the listed building.

As already noted above, the scheme has been significantly amended during the course of the application and additional information on the external and internal changes to the listed building has also been submitted.

Subject to a number of detailed conditions which will secure, amongst other things, the method of how the existing administration extension will be demolished, the Council's Conservation Officer has noted that the works to the listed building itself would not harm its significance. These works are therefore deemed to be acceptable.

In terms of the impact on the setting of the listed building (and its curtilage structures) it is firstly noted that the proposal involves the demolition of all of the existing teaching and administration buildings on the site. These are all twentieth century structures and include the administrative building which adjoins Braboeuf Manor to the north, the Denning Building which is sited directly to the south of Manor, the Fountain Court and the Learning Resource Centre which are both sited to the rear of the Manor, within the south western corner of the site, and the Squash Court Building which is sited to the north of the Manor, close to the sites boundary with Sandy Lane.

The Conservation Officer notes that there are no concerns with the loss of these structures and it is an element of the application which can be 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. Furthermore, it is considered that their removal, individually and collectively, would significantly help to improve and enhance the setting of host listed Manor, and in the instance of the attached administrative building would serve to restore the building back to its original form.

In terms of the proposed new buildings, their impact on the setting of Braboeuf Manor is summarised below:

Block A - This is an element of the application which has been amended to overcome previously noted concerns. The proposed block has been architecturally redesigned, including a reduction in width and revisions to its elevation treatment including the material palette. Improvements to landscaping are also being shown including the repositioning and reduction to the adjacent car parking area and manipulation and grading of levels surrounding the proposed structure. These revisions collectively help to secure the retention of the glimpsed visual connection between the Manor and its driveway, together with enabling the proposed development to be more successfully grounded into the surrounding context. Nevertheless, whilst the redesign is seen more positively than the previous proposal, by virtue of its presence and design being less intrusive to the formal landscape setting of the Manor, it is still maintained that a degree of harm to the asset's setting would result from its introduction to the site.

Block B - The separation and stepping back of the structure is a positive move that provides the listed Manor house room to breathe and a quality of restraint and submissiveness. It is also noted that the previous concerns raised by the Conservation Officer regarding materiality, projecting balconies on the principal elevation and detailing have now all been overcome.

Block D - There are no concerns with the principle of this new building as it is essentially a replacement for the existing Denning Building. Whilst the proposed structure is of a high quality, recessive design that works with the existing topography and aesthetic context, its scale and proximity would result in a visual challenge to the setting of the listed Manor resulting in some harm to its setting and significance.

Blocks G, H and J -- The reduction in building heights and the amendments to massing and plan form to these buildings go some way to achieving a recessive series of structures. However, it is felt that the revised height, scale and massing of the proposed development would still result in a degree of conflict to the Manor's silhouette and backdrop, albeit much reduced when compared to the initial scheme submitted.

In conclusion on this point, the scheme still consists of a small number of instances of harm to the setting and significance of the Grade II listed Braboeuf Manor. The Council's Conservation Officer has noted that this harm can be categorised as being at the low end of less-than-substantial.

### Assessment of impact on significance – curtilage listed buildings

The site includes a number of curtilage listed buildings that have a close association with the Grade II listed Manor. These curtilage listed buildings are scattered around the site and in the main they have been used as for storage and workshops by the University of Law. The curtilage listed buildings and their significance will be listed below:

#### *The Garden Cottage and workshop*

This asset is situated to the rear of the manor house. It is a part two-storey dwelling, with attached workshop and office. The structure is constructed from a palette of Bargate stone, brick accent detailing and horizontal black timber cladding, and is covered over by a steep pitched clay tiled roof. Both cartographic and physical evidence demonstrates that the property has been subject to a degree of alteration and expansion.

The significance of the Garden Lodge and workshop can be summarised as

- use of vernacular material and traditional building techniques in its construction;
- retention of historic plan form and fabric; and
- forms part of group of buildings that are curtilage to Braboeuf Manor.

#### *Walled Garden and summerhouse*

The walled garden and associated summer house were both additions to the site by Lt. Col. J.A.C Younger during the first half of the C20th and formed part of a wider series of terraced gardens, which were replaced as part of the College of Law's expansion. Located south-west of the Manor House, the walled garden is split into two distinctive terraced sections. The smaller northern terrace is defined by a centrally positioned lily pond surrounded by stone paving and boarder planting. A modest stone summer house sits within the eastern corner of this space. To the south of this space is a secondary terrace that steps down to a centrally located circular pond and fountain. Mediating between the lower garden level and the upper circulation paths are a couple of terrace levels of rectangular plan form.

Planting includes small shrubs, clipped box hedging and trees, including a large mature magnolia on its southern edge.

The significance of these structures can be summarised as:

- surviving designed landscape that is curtilage to Braboeuf Manor;
- as an addition to the estate by Lt. Col. J.A.C Younger; and
- shows the evolution of the Manor's grounds and setting.

#### *The Cow Shed*

This is a simple rectangular single storey ancillary building which is situated to the south of the Manor, behind the existing 1960's three-storey teaching block's south-west corner, next to the walled garden. Its construction is predominantly stone with brick quoin

detailing and is covered over by a simple pitched clay tiled roof. The apex of each gable end is faced in horizontal black timber cladding. Openings are limited in number and includes an entrance door on the north elevation.

There is no confirmed date of origin, however historic mapping does indicate its presence within the Manor's grounds from the mid-nineteenth century onwards. The 1947 sales particulars describe the structure as having 'tyings for five [cows]'.

The significance of the Cow Shed can be described as:

- use of vernacular material and traditional building techniques in its construction;
- retention of historic plan form and fabric; and
- forms part of group of buildings that are curtilage to Braboeuf Manor.

### *Pound Cottage*

Pound Cottage (66 Sandy Lane) is a modest two storey residential property which is located at the northeastern corner of the application site, at the junction of Portsmouth Road with Sandy Lane. Cartographic evidence indicates that the structure was present in the early-nineteenth century, but there is every possibility its origins could be earlier, particularly when given that this junction formed the nucleus to the historic hamlet of St Catherine's, that developed around the fourteenth century St Catherine's Chapel.

The cottage is constructed from a palette of stone and brick and is covered over by hipped clay tiled roof. There is clear evidence that it has been subjected to significant adaptation to provide an upper storey (first floor) as seen by the material change from stone to brick work.

Historic photos dating from 1903 illustrates that the property was used as a coffee house, however by 1947 evidence from sales particulars notes that the property was occupied by an employee.

The significance of the building can be summarised as:

- use of vernacular material and traditional building techniques in its construction;
- retention of historic plan form and fabric; and
- forms part of group of historically important buildings that were the foundations and nucleus to the original hamlet of St Catherine's.

In terms of the impact on these curtilage listed buildings, it is noted that internally they would all be remodelled. The Garden Cottage would be converted into one self-contained C2 units. Officers have successfully negotiated significant amendments to the nature of the works proposed to this building which will better preserve its original layout and form. In addition, the modern interventions to the structure would be removed, as would the current uPVC windows. The Cow Shed is currently in a dilapidated state and the proposal would see it converted into ancillary short-term accommodation for guests of the residents. Pound Cottage which is located on the corner of Portsmouth Road and Sandy Lane would be converted back into a C3 family dwelling.

Taking into account the amendments which have been secured during the course of the application, the Council's Conservation Officer notes that there would be no harm caused to the significance of any of the curtilage listed structures on the site.

In terms of the impact on their setting, the Conservation Officer notes that while development within their immediate setting would alter in terms of height, scale, form and appearance, Officers are satisfied that these changes scheme would not result in any additional harm compared with that currently as their subservient ancillary form would be maintained.

As such, no material harm to the curtilage listed buildings has been identified.

#### Assessment of impact on significance - St Catherines Conservation Area

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 on the 28 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.

The area contains an interesting range of important building spanning many centuries, such as the fourteenth century St Catherine's Chapel, sixteenth century timber framed building (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.

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

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. Trees 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.

The significance of the conservation area can be summarised as:

- built form is generally low scale (two-three 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; and
- 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.

It has already been discussed above that the proposal would be visible from various points in the surrounding area. Whereas the existing buildings are also partly visible, they are generally of a lower height and bulk when compared to what they would be replaced with.

Apart from the existing buildings on this site, the prevailing character of the conservation area is of low-rise buildings, generally of one to three storeys tall. There is no doubt that the proposal would be at odds with this established character. However, it is acknowledged that the proposed buildings would all be significantly set back from the road and integrated into the existing sylvan character of the site which would be supplemented by the planting of a large number of new trees. In addition, it must be noted that the site is now vacant and has been since summer 2024. Its further dilapidation and dereliction would be prevented through this application and the possible harm that this would cause to the appearance of the conservation area.

Given the above, Officers believe that the proposal would result in less than substantial harm, at the lower end of the spectrum to the character and significance of St Catherine's Conservation Area.

#### Assessment of impact on significance – listed buildings in the surrounding area

As noted above, there are a number of Grade II listed buildings in the area surrounding the site. These are 64 Portsmouth Road, The Ship public house and St Catherine's Priory and Cottages.

The new built form associated with the proposal is located a significant distance from the above properties. Intervisibility between the neighbouring listed buildings and the new development would be very limited due to the amount of trees and vegetation which exists around the boundaries of the site.

It is noted that the gardens and open space to the south of the manor building would be retained and apart from the community building, there would be no new built development between the manor and Old Portsmouth Road. The existing open space and landscaping would be actively managed as part of the proposed development and as a result, the site would present more positively to the street and the area around these listed buildings than is currently the case, particularly given the site has now been vacant for a considerable period of time.

Due to the distance of separation between the proposals and the neighbouring listed buildings and the nature and extent of the development, as well as the new and actively managed landscapes around the site, the application would preserve and enhance the setting of the listed buildings set out above. Therefore, the proposal is considered to be acceptable in terms of its impact on surrounding listed buildings.

For the avoidance of doubt, the Council's Conservation Officer has also considered the impact of the proposal on the Grade I listed St Catherines Chapel. It is noted that due to the distance from the site and the intervening features, the proposal would not have any adverse impact on its setting.

### Historic England comments

Historic England's (HE) comments have already been summarised in the list of representations above. For completeness, their comments on the most substantive set of amendments are noted as follows:

*'The amended proposals would in effect replace the concentration of built form and accompanying impact of the previous twentieth century buildings added by the University of Law. The adverse impacts of so many large buildings on the setting and significance of Braboeuf Manor is therefore sustained by the present scheme.*

*The reduction in building heights and the rearticulation of massing is more recessive and has to a limited degree reduced the visual harm to the setting of the manor of the original scheme.*

*The new buildings (blocks B, D, G, H and J) would all remain fundamentally visible to the side and behind the manor. This interruption to the clarity and silhouette of the manor house's important façade and roof profile against the treeline behind would sustain the harm to setting identified in the original submission.*

*This harm, and the commensurate cumulative impact on the character of the St Catherine's Conservation Area and Surrey Hills ANOB, would be at the lower end of the less than substantial harm spectrum.*

*The redesign of the lawn pavilion (block A) would be less intrusive on the formal landscaping in front of the manor and the setting views this affords of the gothic façade. However, a degree of harm would still arise, again towards the lower to middle end of the less than substantial harm spectrum.*

*The breathing room created around the manor by separating it from the replacement block to its north (block B) would improve the ability to appreciate the integrity of the listed building as a standalone historic structure.*

*The restoration and retention of the sunken garden, and the repair and conversion of the two cottages and other curtilage buildings remains a positive element of the scheme which would help preserve and enhance the significance of the wider estate.*

*We welcome the amendments made under the revised scheme and we appreciate that our previous concerns on heritage grounds have to a degree been taken onboard. Whilst the revised scheme would still entail various instances of harm to the setting and significance of the grade II listed manor house, the proposals are an improvement on the original submission. We welcome the removal of the outline element of the scheme, and the reduction in the height and number of new buildings proposed. The sustained instances of harm we have identified above should however be further minimised in order to strike the right balance between the proposals and the duty to preserve and enhance the listed building and its setting. Recommendation We leave it to Guildford Borough*

*Council and its conservation specialists to decide whether the residual harm identified above has been convincingly justified and outweighed’.*

### Conclusion on heritage harm

In conclusion, the proposal would result in less than substantial harm to the character and significance of St Catherines Conservation Area and also less than substantial harm to the setting of Braboeuf Manor, a Grade II listed building. The Council’s Conservation Officer notes that in both instances, the harm is at the lower end of the less than substantial scale.

In terms of paragraph 201 of the NPPF and the requirement to ‘..avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal...’, it has already been noted above that the proposed scheme has now been amended on several occasions, including significant amendments when compared to the original proposal which was submitted as part of the pre-application. This includes the most recent changes to the internal configuration of the Garden Cottage which has allowed additional significance of this building to be retained. Officers consider that the applicant has made demonstrable efforts to avoid and minimise harm to the surrounding heritage assets.

Having reached the view that the proposal results in harm to surrounding heritage assets, it is re-emphasised that paragraph 205 of the NPPF states that ‘when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This accords with the duty under section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’. 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’.

In a situation where less than substantial harm is identified, the NPPF at paragraph 208 states that ‘this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’. The applicant has set out a detailed case in this regard and notes that the proposal would result in a range of public benefits. Whether these claimed public benefits outweigh the heritage harm, and the considerable weight and importance that must be afforded to it, will be assessed later in this report.

### Heritage harm v public benefits balancing exercise

As noted above, paragraph 205 of the NPPF states that ‘when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’. The requirements of Sections 66(1) and 72(1) and the case law governing these provisions should be remembered. The report has concluded that the development and its associated works would result in less than substantial harm to a number of heritage assets.



It is noted that the Council's Conservation Officer has concluded that the overall level of harm, taking into account all of the assets, their individual significance and other development in the area would be less than substantial harm and at the lower end of the scale.

Paragraph 208 of the NPPF states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. Guidance in the form of the Historic Environment PPG does seek to explain the concept of 'public benefit' stating that 'public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph eight). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit'. It is acknowledged that the proposal does result in a number of public benefits and these will be set out and discussed below:

#### *Boosting the Council's Housing Supply*

While only one C3 residential dwelling is proposed as part of the development, the 131 C2 units would also count towards the Council's housing supply. Based on a ratio of 1.8 C2 units equalling one C3 dwelling, the proposal would equate to the provision of 73 dwellings to the Council's supply. It is considered that the supply of a relatively large number of dwellings would make a material contribution to the borough's supply of housing.

The proposal may also result in some 'freeing up' of existing residential dwellings when people move from their current properties into the proposed scheme. While the applicant notes that this may result in 130 dwellings being placed back onto the market for use, caution should be used when considering this particular benefit of the scheme. For instance, there is no guarantee that residents of the scheme will come from within the borough and even if they do, it is being assumed that they would be leaving family homes. While this may be a benefit, it is acknowledged that the number of dwellings that may be released to the market as a result is difficult to quantify. However, nonetheless, this does not diminish the benefits of the supply of 73 units as already set out above.

This is clearly a public benefit which directly flows from the application.

#### *Provision of C2 accommodation*

The proposal provides a total of 131 C2 units.

Policy H1(5) of the LPSS states that 'the provision of well-designed specialist forms of accommodation in appropriate sustainable locations is encouraged, taking into account local housing needs'.

Whilst the Council does not have a target for C2 accommodation or specialist housing in the Local Plan, the need for this type of housing in the borough is fully recognised. The

Surrey County Council publication entitled 'Planning profile for accommodation with care for older people Guildford Borough' dated April 2024, confirms that there is a current need for 427 market extra care units in the Borough. By 2035, Surrey County Council explains that this need is projected to increase to 501 units.

While there has been some provision of C2 accommodation in the borough over recent years, even taking this into account there is still an evidenced need for more market extra care units to meet the demands of an ageing population.

The proposal would provide specialist accommodation designed for the borough's older population. Based on an expected occupancy rate of 1.4 persons per unit, the development would have a population of approximately 184 people who would have access to 24-hour personal care in units which will be adaptable for all stages of life and mobility.

The boost in the supply of 131 market extra care units, which would provide an additional layer in the supply of specialist housing in the borough would be a substantial positive public benefit to the Council's ability to supply a wide range and mix of house types for the whole community.

#### *Improvements to the site resulting from the proposal*

While it is noted that harm to heritage assets has been identified, this does not exclude the possibility of the development resulting in certain improvements to the site over and above the existing situation. These will be briefly set out below.

The proposal would result in the demolition of most of the twentieth century buildings on the site which are of no particular architectural merit. While this factor in itself may not weigh heavily in favour of the proposal it is noted that the demolition of the existing administration building is seen as a positive aspect of the development. This building is currently awkwardly connected to the listed structure and harms its setting. Therefore, the demolition of the administration building and the improvement to the setting of Braboeuf Manor (even considering the new proposed built form) would be a clear benefit of the development. In addition, the proposal seeks to restore the Manor as well as a number of other curtilage listed buildings and structures within the grounds. All of these structures have been vacant since summer 2024 and are now experiencing various stages of disrepair. The improvements and restoration of these buildings is another tangible public benefit of the development.

#### *Economic benefits*

At present, the site is vacant and does not contribute to the economy of the borough. It is acknowledged that the site has until recently been occupied by the University of Law, who have now vacated the site. As already noted above, there is very little prospect of another educational use of the site coming forward.

As such, the proposal would result in some economic benefits to the local economy by redeveloping the site. These would arise from the operation of the facility itself, through for example new jobs, increased spending power in the town due to additional residents etc. However, the level of this benefit has not been fully quantified by the applicant.

The proposal would also result in temporary economic benefits during construction. Again, this factor is generally seen as a legitimate public benefit of development, however, as it is temporary, its weight is acknowledged as being limited.

The economic benefits of the proposal are therefore considered to be a public benefit of the proposal.

### Public access

The site is currently in private ownership and there is no general access for the public. The proposal seeks to allow access to the large open space area to the front of the site as well as granting access to Braboeuf Manor for public groups and organisations who will be able to book spaces within the building. This would be secured through the legal agreement.

While it is acknowledged that the site is a 20-minute walk from the town centre, there is a relatively large residential population in the immediate area who would be able to use the grounds as a new leisure and recreation area. Allowing the public and public groups to access the grounds and the Manor itself would be a public benefit of the scheme.

### Biodiversity and ecology benefits

As noted above, the LPDMP seeks biodiversity net gain of at least 20%. The submitted Biodiversity Net Gain Assessment details that the proposal will provide a net gain of 22.51% in habitat units and a 22.08% gain in hedgerow units. As noted earlier in the report, biodiversity enhancements are to include:

- bird and bat boxes erected on or integral within the new building and/or on mature trees
- native hedgerows, scrub, and rough grassland corridors
- enhancement and creation of woodland
- native tree planting
- wildflower grassland
- biodiverse green roofs
- bioretention areas

The applicant has demonstrated that the proposal would achieve a BNG in excess of the Council's requirements.

A betterment in biodiversity is considered to be a public benefit of the scheme.

### Energy and sustainability benefits

The proposal would be a fully electric development, thereby reducing the reliance on fossil fuels for energy. The Council's requirement is that developments should achieve a 20% reduction in carbon emissions. However, it is acknowledged that this is now superseded by Building Regulations requirements. Nevertheless, through the use of Mechanical Ventilation with Heat Recovery (MVHR), a centralised Air Source Heat Pump system, coupled with top-up electric boilers and Photovoltaic panels the development is expected to achieve a 65% reduction in CO2 emissions beyond the Building Regulations Part L 2021 baseline.

In addition, the other sustainability benefits of the scheme have been set out above which include the provision of EV charging, and sustainable transport options for residents including an on-site mini-bus service and car club.

The benefits of reducing carbon emissions, well above the Part L 2021 baseline are obvious in terms of climate change. Such a significant betterment is considered to be a public benefit of the scheme.

### **Heritage harm v public benefits balance**

Overall, the public benefits of the proposal are wide ranging and long lasting. The proposal would result in the re-use and restoration of a Grade II listed building as well as its associated structures which are curtilage listed. While some harm has been found to the setting of Braboeuf Manor, the improvements to the building itself and the fact that it is being brought back into use are strong public benefits of the proposal.

The proposal would also provide a large quantum of C2 units where there is an identified need for such accommodation in the borough. The scheme would also add the equivalent of 73 units to the Council's housing supply.

As noted above, paragraph 205 of the NPPF states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. The impacts on the heritage assets are recognised and are given great weight and considerable importance.

Although great weight and considerable importance has been afforded to the heritage harm, it is considered that the significant scale of the public benefits are considered to be sufficient in this instance to outweigh the identified heritage harm.

In terms of paragraph 201 of the NPPF and the requirement to '...avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal...', it has already been noted above that the applicant has sought to minimise the harm resulting from the proposal by significantly amending the scheme by reducing some of the building heights, changing the external materials etc while still producing a scheme that the applicant is prepared to invest in. In Officer's view, the scheme has been amended to minimise its harm by as much as possible.

### **Archaeology**

The application has been submitted with an Archaeological Desk-Based Assessment. This notes that there have been no past investigations within the site and none within the vicinity, consequently the archaeological potential is not well understood.

Predicted buried heritage assets that may be affected by the proposals comprise:

- remains associated with Braboeuf Manor. This includes buried remains of buildings that shown on the Tithe map of 1841, demolished before 1871, along with a northern wing dating to the end of the seventeenth century referred to in

documentary sources It is possible that further below ground wall footings survive, of medium significance due to association with the Grade II listed house.

- buried remains of with former landscaped gardens of Braboeuf Manor. In the early twentieth century the formal house gardens were developed by Colonel Younger of which relict features may be preserved in the form of wall footings, pathways or other land management features. This includes a long tract of land to the south-west and smaller area directly adjacent to the manor house to the southeast. The is high potential for remains of be low or moderate significance, depending on survival, due to association with the listed house.
- previously unrecorded medieval remains. Braboeuf estate dates back to the thirteenth century, with the current house integrating part of the earlier stone medieval manor house. There is high potential for medieval remains, such as footings, ditches, pits, of potential medium or high significance.

There is uncertain but likely moderate potential for prehistoric remains. The site's location on higher ground close to the River Wey, together with finds found in close vicinity (St Catherine's Hill) suggest background potential during this period. The significance of any prehistoric remains present, would depend on their nature and extent. The site has uncertain, probably low potential for Roman remains, as the site would have lain some distance away from the main road network and settlements.

Archaeological survival across the site is anticipated to be variable, high within open grassed areas which have not previously been developed, falling to moderate or low in those areas which have been built on since the nineteenth to twentieth centuries. The main impact on archaeological survival within the site will have been the construction of the existing 1960s University of Law Buildings, which occupy approximately 10% of the ownership area. In these areas survival is likely to be negligible.

The main impact would derive from preliminary site stripping, levelling and demolition. There may be further impact from foundations for new buildings, landscaping, services and drainage. In light of the potential of the areas of proposed impact to contain post-medieval and/or medieval remains, preliminary evaluation is recommended to clarify the presence, nature and significance of any archaeological remains present, to allow an informed decision regarding an appropriate mitigation strategy. This will likely be in the form of geophysical survey followed by targeted trial trench evaluation, focussed on identifying the manor house and gardens within the western and central sections of the site in areas. The surveys will focus on areas that have been previously undeveloped but will be subject to new development as part of the works. Such work could be undertaken under the terms of a standard archaeological planning condition. Any archaeological work would need to be undertaken in accordance with a Written Scheme of Investigation (WSI) setting out the scope and methodology for the work.

The County Archaeologist has reviewed the application and no objections are raised. The County Archaeologist agrees that with the measures suggested by the applicant, this would provide an appropriate mitigation response to compensate against the loss of the archaeological resource. A condition is recommended which secures the measures set out by the applicant and agreed by the County Archaeologist.

Taking into account the above, the development is deemed to be compliant with policy D3 of the LPSS and the advice set out in Chapter 16 of the NPPF.

### **Amenity of future occupants / living environment**

As noted above, policy D5 of the LPDMP seeks to avoid developments which result in unacceptable living conditions for new residential properties. The NPPF and Policy H1 of the LPSS also require the need for conformity for all new dwellings with the nationally described space standards (NDSS), as well as creating places with a high standard of amenity for existing and future users. Policy D5 also states that all new build residential development proposals, including flatted development, are expected to have direct access to an area of private outdoor amenity space.

In providing appropriate outdoor amenity space, both private and shared, development proposals are required to:

- take into account the orientation of the amenity space in relation to the sun at different times of the year;
- address issues of overlooking and enclosure, which may otherwise impact unacceptably on the proposed property and any neighbouring properties; and
- design the amenity space to be of a shape, size and location to allow effective and practical use of the space by residents.
- all balconies or terraces provided on new flatted development proposals are required to be, a) designed as an integrated part of the overall design; and b) a minimum of 4sqm.
- development proposals are required to have regard to relevant national and local design guidance or codes, including in relation to garden sizes and residential building separation distances.

### **Internal space standards**

The applicant has confirmed that all new residential units are to meet the Nationally Described Space Standards.

Pound Cottage, the existing C3 dwelling located to the front of the site at the junction of Sandy Lane and Old Portsmouth Road is an existing dwelling and a listed building. It is recognised that the dwelling is not compliant with the space standard requirements. However, given the requirements are applicable only to new accommodation and the works to Pound Cottage are to be limited to refurbishment of the existing, this is not considered a breach of policy requirements.

The proposal is compliant with the NPPF and Policy H1 of the LPSS in this regard.

### **Private open space**

It is noted that of the 131 apartments in the proposed scheme, a total of 105 would have direct access to a private balcony or garden terrace. As would the retained C3 dwelling at Pound Cottage. As such, the proposal does conflict with the requirements of policy D5 of the LPDMP in this respect. However, this would be offset by the fact that all apartments would have access to the high-quality shared terraces, courtyards and gardens which are proposed as part of the development.

Policy D5 also requires that all proposed balconies should be a minimum size of four sqm. The applicant has confirmed that the proposal complies with this requirement.

In total, eight areas of private open space (for residents) are proposed which take the form of courtyards and gardens which are set to the front of blocks. These spaces would be accessed directly from adjacent residential buildings and surrounding resident only areas. Indicative plans have been provided for the design of the courtyards and gardens, they show that they will be finished with areas including landscaping, orchard planting, lawns and seating. The exact design of these spaces could be controlled by condition. The numerous spaces would provide valuable private amenity space for future residents.

### Public open space

Policy ID6 of the LPDMP provides details on how much open space is to be provided on-site as part of development proposals. The existing C3 dwelling is to be retained, development would not result in a net increase in C3 accommodation and as such Policy ID6 is not applicable.

The requirement to provide open space for children and youths, allotments, parks and recreation grounds (including outdoor sports facilities/playing pitches), does not apply to specialist accommodation for older people within Use Class C2.

Based on a population of 255 people, calculated as per policy ID6, and the proposed 131no. C2 dwellings, the site should be delivering 0.3 ha of amenity green space on site. Amenity Green Space is defined as informal recreation space in and around housing.

In terms of on-site amenity, it is noted that the proposal provides a range of open space areas as part of the development. These include approximately 3 hectares of space which will be publicly accessible to all (such as the existing parkland to the front of the site adjacent to Old Portsmouth Road), as well as approximately 4.7 hectares of open space which would only be accessible to residents of the scheme. Given the different spaces within the scheme, whilst it is difficult to calculate accurate figures for the provision as part of the development, it is noted that on-site provision of open space would be far in excess of policy requirements. A wide range of areas of open space are proposed with detail to be secured via condition.

The proposal is compliant with Policy ID6 of the Local Plan.

### Other matters

It is noted that there are a number of instances within the development where residential dwellings would front onto new residential amenity spaces or streets. Via landscaping proposals, to be secured via condition, the amenity of these units could be enhanced and protected.

### Daylight and sunlight

Paragraph 135 of the NPPF states that planning decisions should ensure that developments '...create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users' Policy H1 of the LPSS also requires creation of places with a high standard of amenity for existing and future users whilst Policy D2 of the LPDMP confirms that development proposals are required to avoid having an unacceptable impact on the living environment of existing residential properties or resulting in unacceptable living conditions for new residential properties, in terms of access to sunlight and daylight.

NPPF paragraph 129c reads ‘...when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)’.

The application is supported by an ‘Internal Daylight and Sunlight Report’ (July 2024, Point 2 Surveyors).

#### *Daylight – proposed dwellings*

A total of 28no. rooms across the site have been assessed. It is industry practice to test a representative sample of rooms. Results confirm that 93% of the rooms assessed will achieve illuminance levels that either meet or exceed the recommended guideline values based on the targets for their specific room use. It is noted that the results would have been higher if balconies were not required through other policies of the LPDMP.

Assessment results demonstrate a very high adherence level to illuminance levels for a development comprised of flats. Officers consider that the daylight results do not result in unacceptable living conditions and thus satisfy policy D5 in this regard.

#### *Sunlight – proposed dwellings*

The sunlight exposure for each proposed living/ kitchen / dining room of the representative sample has been calculated. The results demonstrate that each dwelling with a southerly orientation will exceed the suggested target minimum level of sunlight and will therefore fully comply with the guidelines.

While some apartments, particularly those that are north facing and at ground floor level, may not achieve the same levels of sunlight as other dwellings within the scheme, given the scale of the proposals, on balance, the scheme is considered to be acceptable in this regard. The applicant has confirmed that main living rooms are oriented south as far as possible across the scheme to ensure future residents have access to sufficient sunlight.

Officers consider that the daylight results do not result in unacceptable living conditions and thus satisfy policy D5 in this regard.

#### **Highway/parking considerations**

The applicant has submitted a Transport Assessment (TA) with the planning application. This provides details regarding the impact of the development on the local highway network. It is important to note that the TA has been amended to reflect the revised submission which now only includes the 131 units of C2 accommodation. The TA has been reviewed by the County Highway Authority and their comments will be set out below.

NPPF Chapter 9 ‘Promoting Sustainable Transport’ expects transport issues to be considered from the earliest stages of development proposals so that the potential impacts of development on transport networks can be addressed.



The LPSS contains the following policies relevant to assessment of the proposals:

S3(6) requires schemes to demonstrate high quality urban design and contribute wherever possible to (c) an attractive and safe public realm; (d) legible routes that...give priority to pedestrians and cyclists over motor vehicles.

D1(6) requires all new development to ensure...it creates safe and accessible spaces, with particular regard given to maximise opportunities for pedestrian and cycle movement and the creation of a high quality public realm; (9) requires development to be well designed to meet the needs of all users, including in respect to transport infrastructure and public realm.

ID3 – ‘Sustainable transport for new developments’ requires new development, in so far as site size, characteristics and location allow, to maximise (a) high quality, safe and direct walking and cycling routes with priority over vehicular traffic; (c) the improvement of existing cycle and walking routes to local facilities, services, and bus stops, (d) the provision and improvement of public and community transport; (e) opportunities for people with disabilities to access all modes of transport.

The LPDM also includes policies relating to parking provision, the creation of a cycle network and public realm. These policies along with the new Parking Standards for New Development SPD will be considered, where relevant below.

#### Highway capacity

As regards the capacity of the highway network it is important to acknowledge that the application site was until very recently (summer 2024) in use as an education institution. As such, it would have generated a significant number of vehicle trips on the network from staff, students and visitors. It is noted that during the 2020/21 academic year, there were approximately 845 staff and students on site. In the 2022/23 academic year this had decreased to 410, presumably as the site started to wind down before relocation. Based on the higher level of occupancy in 2020/21, the former use generated 120 two-way vehicle movements in the AM peak and 130 movements in the PM peak.

The C2 element of the proposed scheme is expected to generate a significantly lower number of two-way movements – just 33 in the AM peak and 24 in the PM peak. This is a large overall reduction when compared to the former use and as such, the TA concludes that the proposal would have a negligible impact on the local road network.

The applicant's TA also acknowledges that the applications at the neighbouring Surrey Police site at Mount Browne will increase movements along Portsmouth Road. However, as noted above, the University of Law proposal would significantly reduce traffic movements on Portsmouth Road, so there would be no harmful cumulative impact arising from the approval of both applications.

The County Highway Authority raises no concerns regarding the capacity of the highway network and given this and the details provided above, the proposal is considered to be acceptable in this regard.

### Access and improvements to the network

The existing site access for vehicles is on Portsmouth Road, which forms an all-movements priority junction with a right-turn lane on Portsmouth Road for vehicles entering the site. The junction arrangement is considered fit-for-purpose based on historic volumes of traffic accessing the site which would be higher compared to estimated vehicle trips for the proposed development.

However, further to requests made by the County Highway Authority, the proposals will include a Copenhagen style crossing in the bell-mouth of the site access, which would effectively extend the footway surface across the carriageway of the site access. In addition, the proposals will also include the removal of the existing diagonal footpath to the north of the site access and the associated brick steps and hardstanding. This will be replaced with a dedicated pavement which will now continue along adjacent to the access, joining the Copenhagen crossing at the front of the site.

In this regard, the County Highway Authority raise no objections to the continued use of the existing access.

In addition to the improvements noted above, the applicant has also committed to delivering the following measures to improve highway and pedestrian safety in the vicinity of the site:

- proposed pedestrian refuge in Portsmouth Road carriageway north of the junction with the site access;
- amendments to the north corner radius of the site access road, at the junction with Portsmouth Road, reducing the corner radius to approximately 8m;
- provision of a 1.8m wide footway on north side of the site access carriageway to link between existing footpath, which extends into the site (as noted above), and link to the proposed pedestrian refuge on Portsmouth Road, north of the site access. The proposed footway would provide step-free access between the site and Portsmouth Road;
- proposed dropped kerbs in existing and proposed footways on Portsmouth Road to align with the proposed pedestrian refuge;
- amendments to the south corner radius of the site access road, at the junction Portsmouth Road, reducing the corner radius to approximately 8m;
- improved footway width of 1.8m and extended footway on south side of site access carriageway, to link with the existing pedestrian refuge on Portsmouth Road, south of the site access;
- tactile paving and dropped kerbs at the junction between Ferry Lane and Portsmouth Road; and
- additional tactile paving would also be provided on Chestnut Avenue, at the junction with Portsmouth Road, assisting in the pedestrian linkage to the nearby bus stops.

In addition to the above, the applicant has agreed to make improvements (under a s278 agreement) to the two closest bus stops by the site, to include accessible kerbing, RTP1 display provision, and shelter provision / improvements. A s106 contribution of £50,000 is also being secured and this would be used by the County Highway Authority for a range of highway safety improvement works in the vicinity of the site. These would widening the existing southwest footway (or narrowing the carriageway at the junction)

on Portsmouth Road / Guildown Road junction to improve the visibility for motorists existing from Guildown Road to Portsmouth Road. Widening of the existing island and kerb alignments of Artington Walk along with relocating the existing give way marking. Introducing anti-skid surfacing on each approach to this junction, and improving the existing road markings and signages, in the vicinity of the junction. The £50,000 contribution will be secured through the legal agreement.

The applicant has also committed to providing a contribution to improve public footpaths in the vicinity of the site which include footpaths 23, 545, 276 and 24. This will include widening and resurfacing.

### Parking

Policy ID10 of the LPDM and the Parking Standards for New Development SPD sets out the Council's expected parking standards for C2 development. The applicant notes that the proposal fits best with the elderly (sheltered) accommodation requirements which are for one parking space per one or two-bed self-contained unit. Taking this approach, the proposal would generate a maximum parking requirement of 131 spaces for the C2 accommodation. The revised proposal notes that 92 parking space would be provided for the proposal and these spaces would be located on the existing car park in the north-west corner of the site. This equates to a provision of 0.7 spaces per C2 unit which is well below the Council's maximum standard.

It is important to note that the C2 parking would be by valet only. Residents of the units would pick-up and drop-off their vehicles in the courtyard area to the east of Braboeuf Manor. Staff would transport vehicles to and from the car park for residents and this service would be provided on a 24/7 basis. Residents can either walk from the courtyard to their individual residences or alternatively the operators will also run a buggy service in the event that there are mobility problems etc.

The revised proposals include visitor and staff parking spaces for the extra care units within the existing car park on-site, next to the valet parking area. The applicant has estimated a visitor demand of approximately one out of every six C2 units receiving a visitor travelling by car a day, which would equate to approximately 24 visitors at the site a day. It is anticipated this level of demand would require five visitor parking spaces to be provided on-site in the existing car park. The extra care units will be staffed with an estimated maximum of ten staff on-site at any one time. Parking for staff would be provided within the existing car park, providing eight car parking spaces for staff. However, it should be noted that the County Highway Authority has commented that the level of visitor parking may be insufficient and a condition is recommended which would require the applicant to submit revised details for the provision of a greater number of visitor spaces. Given the overall size of the existing car park these additional spaces could be accommodated very easily.

In terms of the proposed on-site restaurant it is noted that this will primarily be used by residents of the development, however, it will also be open to the general public. A small parking area is proposed to the front of the site close to Building A. This would provide a total of 13 parking spaces for use by outside visitors to the restaurant. Based on the size of the proposed restaurant, the Council's Parking Standards for New Development SPD requires a maximum parking provision of 27 spaces. However, it is acknowledged that these standards are for a restaurant which is fully public. It is noted above that it is

expected that patronage of the restaurant is expected to be mainly residents of the development's 131 C2 units, with public use more limited. As such, given this and the fact that the Council's parking standards for restaurants are maximum figures, the proposed 13 spaces provided would be acceptable in this instance. It is further noted that even if parking is an issue on any given day, it is highly unlikely that this would result in inconsiderate or illegal parking on the public highway. In reality, if parking spaces are not available, visitors will park elsewhere on the site, away from the public highway and therefore, there would be no resultant harm caused to highway safety in the wider area.

A percentage of the parking spaces for residents, visitors / staff and the restaurant will be fitted with EV charging. This will be secured by condition.

Cycle parking will be provided on site in accordance with the Council's standards for the residences, visitors / staff and the restaurant. This will be secured by condition. EBike charging will also be provided for each residential unit.

On the above basis, the proposed parking provision on the site is deemed to be acceptable.

### Servicing and refuse

Deliveries to residents of the C2 units will be received by a central concierge based in the existing Braboeuf Manor building, as proposed in the previous proposals, therefore the revised arrangement will see no changes. The proposed hard standing courtyard area to the east of the retained Braboeuf Manor building, accessed via the main site access road, would be used to accommodate vehicles up to 10m in length to stop and turn in this area.

Deliveries to the restaurant would be undertaken within the proposed parking area north of Building A, with delivery vehicles able to reverse into the parking area from the site access road.

As part of the revised proposals, waste storage for the C2 units would be located in a central bin store in Building P (located to the north-east of Braboeuf Manor) which would be managed by the on-site management team. Waste would be collected directly from the bin store in Building P, with waste collection vehicles able to stop and turn in the site access roads. The restaurant waste would also be stored in and collected from Building P.

Appropriate access is also provided for emergency vehicles. Turning areas are proposed at the following locations:

- building A car park
- courtyard east of Braboeuf Manor
- in between Buildings J and H

### Sustainable travel

The highways changes secured as part of the development, as noted above, will improve the accessibility of the site for pedestrians as well as cyclists.

It is acknowledged that Active Travel England have expressed reservations about the suitability of the local highway network for safe pedestrian and cycle travel to and from the site to the town centre. While it is acknowledged that the pavements along Portsmouth Road are narrow in places, given the nature of the surroundings it is not possible to widen or significantly improve them. In this context the applicant has committed to making improvements where they can be made. The new crossing points will for the first time safely connect the site to the existing pavement along Portsmouth Road. The site is a 15-20 walk from the town centre meaning that the range of shops and facilities within the town centre are accessible in a sustainable manner. Together with the other sustainable travel measures which will be outlined below, it is considered that the package as a whole will allow residents to access the town centre in a sustainable manner, although it is acknowledged that this may not always be on foot or cycle.

In addition to the sustainability measures already noted above (EV charging, cycle parking, bus stop improvements etc) the applicant is also committed to providing a mini-bus and a car club for its residents.

The proposals include the provision of an 8-seater electric mini-bus service for residents of the C2 units. The mini-bus would be owned and operated by the applicant and the service would operate between the site and Guildford town centre, providing access to amenities including the rail station and shops. The service would operate on a prebooking basis. It is noted that the mini-bus would be parked within the proposed courtyard east of Braboeuf Manor, where pick-up and drop-off would be undertaken. Electric vehicle charging facilities will be provided on site for the vehicle.

The proposals also seek to include a car club space on-site which would be managed by a car club operator or, alternatively, by the applicant, in the form of a private club for residents living on-site.

Both the provision of a mini-bus and the car club and the details of their operation will be secured by condition / legal agreement.

#### Highway / parking conclusions

It has been demonstrated through the TA and the lack of any objection from the County Highway Authority that the proposal would not have a severe impact on the local highway network, even when taking into account the other developments in the vicinity of the site.

The proposal is considered to be acceptable in this regard and compliant with policies S3, D1 and ID3 of the LPSS, as well as policy ID10 of the LPDMP.

#### **Flooding and surface water drainage**

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. It also safeguards groundwater source protection zones and principal aquifers from inappropriate development.

Policy ID4 seeks to conserve and enhance biodiversity and habitat including the protection of watercourses. Adverse impacts on watercourse setting, function and water quality should be avoided. Development should support the achievement of Water

Environment (Water Framework Directive) (England and Wales) Regulations 2017 objectives.

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 Sustainable Drainage Systems (SuDS).

Paragraph 173 of the NPPF requires that development should not increase flood risk elsewhere and at paragraph 175 major schemes should incorporate sustainable drainage systems (SuDS).

With reference to the British Geological Survey map, the application site is shown to be underlain primarily by Folkestone Formation (Sandstone). However, there is no information on the superficial deposits located at the Site or BGS borehole records within the vicinity of the site to confirm underlying geology.

The Groundwater Vulnerability Map (DEFRA's Magic Maps) highlights that the Site is designated within a High Vulnerability Zone with Soluble Rock Risk also present across the Site meaning that pollutants can easily be transmitted through to the groundwater.

The applicant has submitted a site-specific Flood Risk Assessment which assesses the current and future flood risk to and from a development site. In addition, there is an illustrative Surface Water Drainage Strategy plan and a Geo-Environmental Phase 1 Desk Study.

The submitted FRA makes the following assessment on the different types of flooding potential for the site, which is not disputed:

### Flood risk

#### *Fluvial Flood Risk*

The entirety of the site is located in Flood Zone 1, which is defined as an area with the lowest probability of flooding. The site therefore can be classified as having a very low risk of fluvial flooding.

#### *Groundwater Flood Risk*

The applicant's consultation with Surrey County Council confirmed, "the majority of the site is located within an area which is classed as having limited potential for groundwater flooding to occur". Therefore, the risk of groundwater flooding at the Site has been assessed to be low.

#### *Surface Water Flood Risk*

A very small area of land adjacent to Braboeuf Manor (next to the existing pond) is in an area at higher risk of surface water flooding, as defined on the EA surface water mapping (1 in 1000 years).

Overall, there is a very low risk of surface water flooding across the site.

### *Sewer Flood Risk*

TW Asset Records provides information on the public drainage network surrounding the Site, detailing only 2 assets within close proximity to the Site - a foul and surface water sewer located in Portsmouth Road.

There is an existing private foul and surface water network onsite.

The GBC's Level 1 SFRA highlights historical sewer flooding incidences within areas of Guildford, with 4-6 internal and external floods shown to have been within the vicinity of the Site. This is however over a large area, therefore there is no confirmation that this flooding was on this site.

Based on the information available the probability of sewer flooding impacting the Site can be assessed as low.

### *Reservoir and Artificial Sources of Flooding*

Based on the information available, the probability of flooding from reservoir and artificial watercourses at the Site is considered to be very low.

### *Proposed SuDS*

Surface water within the Site boundary currently drains via soakaways. Therefore, the applicant proposes to utilise this existing strategy as much as practicably possible.

The applicant has assessed the site in the following way, given the nature of the proposed re-development, with historic and listed buildings onsite being refurbished alongside the demolition and re-development of other building:

- buildings proposed to be refurbished, including Braboeuf Manor, have not been modelled and are assumed to discharge surface water as existing
- all buildings to be demolished and redeveloped, alongside brand-new proposals, have been modelled using an assumed infiltration rate

The indicative strategy currently proposes, a series of infiltration tanks throughout the Site where deemed practicable. Due to the nature of the tanks proposing to infiltrate, they are required to be offset a minimum of 5m from building foundations. This, combined with impermeable areas for tank requirements being calculated as the building footprint, adjacent roads & impermeable landscape have resulted in a total attenuation of 1501m<sup>3</sup> and have been placed where deemed most practicable.

No site infiltration testing has been undertaken, and therefore the applicant has used an assumed hypothetical infiltration rate. Therefore the strategy outlined above is at a high level only, and the proposed surface water drainage solution will be controlled via conditions which first require on site testing to confirm the appropriate drainage method.

Following a number of rounds of consultation, the Lead Local Flood Authority (LLFA) now raise no objection on the basis of the addition of 3 conditions (conditions 12, 13 and 14 above). The conditions require full details of the proposed drainage scheme for both new

and refurbished elements of the application and required verification reports per phase.

### Waste water

The applicant proposes that all foul water onsite be discharged via gravity through a combination of existing and proposed foul water networks onsite.

Thames Water have stated that they have no objection in relation to foul water sewage network infrastructure capacity. In relation to surface water, additional information is required in order to understand the impact of development and the ability of the network to accommodate surface water flows. This information can be secured via condition.

With the addition of conditions as recommend by the LLFA and Thames Water, the proposals accord with adopted Local Plan policy in relation to flooding and drainage.

### The impact on neighbouring amenity

Policy D5 of the LPDMP states that 'development proposals are required to avoid having an unacceptable impact on the living environment of existing residential properties or resulting in unacceptable living conditions for new residential properties, in terms of:

- a) privacy and overlooking
- b) visual dominance and overbearing effects of a development
- c) access to sunlight and daylight
- d) artificial lighting
- e) noise and vibration
- f) odour, fumes and dust

### Privacy, overlooking and visual dominance

In terms of neighbouring properties, the site is relatively isolated, however, there are a number of existing dwellings in the vicinity. Properties which are closest to the developable area of the site are located to the north and west, on Sandy Lane and The Drive respectively.

The existing dwelling to the front of the site at the junction of Sandy Lane and the A3100 Portsmouth Road is in close proximity to its neighbours though is to be retained as the sole C3 dwelling on site and. The impact of this dwelling on neighbouring properties will remain as existing.

Existing dwellings on both Sandy Lane and The Drive will be, at the closest, in excess of 35m from proposed new built form, the majority of the proposed construction works would be located well away from the boundaries of the site. While some of the new and replacement buildings would be multiple storeys tall, due to the topography of the site and distance to site boundaries, there would be no harm caused to neighbouring properties in terms of overlooking, overbearing or loss of privacy.



It is noted that, to the south-west, the site shares a boundary with Mount Browne, Surrey Police Headquarters. As above, that site is subject to a live planning application which recently received a resolution to approve from the Committee. A multi-storey car park would be located close to the boundary of the Mount Browne site, to the south-west of this application site. Boundaries between the sites consist of thick tree planting and vegetation, intervisibility between the sites is very limited. Even if this were not to be the case, the proposed multi-storey car park is to be set well off the common boundary and angled away from it. Proposed dwellings under consideration here are similarly off-set from the boundary, there would be no adverse impacts in terms of overlooking, overbearing or loss of privacy to the dwellings proposed here.

It is not considered that the proposed development would result in an unacceptable impact on the amenity of adjoining properties.

#### Access to sunlight and daylight

Proposals will not result in impact on existing levels of access to sunlight and daylight currently experienced by neighbouring dwellings.

#### Artificial lighting

The proposed development would result in an increase in the number of night-time light sources on site as a result of proposed residential development on site. A condition is proposed to secure the delivery of a sensitive lighting scheme, to be approved by the Local Planning Authority. It is not considered that the introduction of additional lighting on site will result in an unacceptable impact on the living environment of existing residential properties or, result in unacceptable living conditions for new residential properties.

#### Noise

The applicant has submitted an Environmental Noise Assessment in support of the application. Background noise levels typical of the daytime and night-time have been measured and the nearest noise sensitive receptors identified. It is concluded that the proposed development would not act to negatively impact neighbouring amenity. A condition, ensuring that on-site plant is not to exceed background noise levels is proposed so as to ensure the amenity of both neighbours and future residents.

#### Odours, fumes, and dust

It is noted that the potential effects during the construction and demolition phases of development would include disturbance and pollution from construction traffic, dust and other emissions from construction activities including the potential for noise and dust emissions from on-site activity. These activities are of a temporary nature.

In terms of the disturbance created during construction and demolition, this is an inevitable consequence of any large-scale development project. However, the Local Planning Authority would seek to protect the amenity of surrounding residents so far as

possible. These measures include conditions for the approval of a Construction Transport Management Plan (CTMP) and Construction Environmental Management Plan (CEMP). A working hours condition would also be included.

The nature of the works, given the proximity of residential dwellings, would not on balance, result in undue noise and disturbance. There are also safeguards under The Environmental Protection Act 1990.

In regard to potential impact post development, the proposed restaurant within Block A is to be subject to planning condition to ensure the fitting of suitable ventilation and filtration equipment is installed prior to opening so as to protect adjoining premises and residential amenity.

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 nearby properties. Proposals are considered to comply with Policy D5 of the LPDMP.

### **Environmental health matters**

#### **Air quality**

The site lies outside by close to the Guildford Town Centre Air Quality Management Area (AQMA) which was designated on 1 October 2021. The AQMA was declared due to exceedances / potential exceedances of annual air quality for NO<sub>2</sub> at several locations as well as using detailed air quality assessments using 2019 data. Policy P11 of the LPDMP notes that development proposals should have regard to the need to improve air quality and reduce the effects of poor air quality and that they must not result in significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designated for their nature conservation value, from any sources of emissions to air. The policy goes on to note that development proposals within, and in close proximity to AQMAs are required to demonstrate how the proposed avoidance and mitigation measures would make a positive contribution towards the aims of the Council's Air Quality Strategy and the appropriate Air Quality Action Plan.

It is noted that compared to the previous use of the site, the proposal would generate significantly less traffic movements on local roads through the AQMA. This is in addition to the other measures being employed by the applicant which would also have the effect of reducing emissions from the site, compared to what otherwise would be the case. These include, the use of EV charging to assist with the use of electric vehicles, a car club for the use of residents and an on-site minibus which would be used to transport residents to the town centre, train station etc.

The air quality report submitted with the application notes that any operational air quality impacts associated with the development would be negligible and the effects not significant. Any impacts during construction would be localised and of a temporary nature.

The Council's EHO raises no objection to the development on air quality grounds. With the conditions requested by the EHO the proposal is considered to be compliant with policy P11 of the LPDMP.

### Contamination

Policy P10 of the LPDMP deals with contamination and this matter should be dealt with through the planning process, including the level of detail which will be expected. The application is accompanied by a Preliminary Risk Assessment which concludes that the contamination risks at the site are low to moderate. Intrusive site investigations are recommended before construction begins and this could be secured by condition.

The Council's EHO has reviewed the Preliminary Risk Assessment and notes that the contamination present does not present any barriers to this development subject to conditions. As such, the EHO raises no objection to the proposed development, subject to conditions to ensure the development is suitable for its proposed use.

### Impact on ecology, nature conservation and biodiversity

Chapter 15 of the NPPF sets out the Government's planning policy with regard to the natural environment. Paragraph 180 of the NPPF states that 'planning policies and decisions should contribute to and enhance the natural and local environment by...' (inter alia):

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Paragraph 186 of the NPPF states that 'when determining planning applications, local planning authorities should apply the following principles:

- if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely

impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

- 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; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Policy ID4 of the LPSS sets out the Council's principles in relation to biodiversity and ecology. The following policies of ID4 are considered to be particularly relevant to this section of the report:

- the Council will maintain, conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs). The Council will produce a Green and Blue Infrastructure Supplementary Planning Document (SPD) setting out how this approach will be implemented.
- new development should aim to deliver gains in biodiversity where appropriate. Where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA's objectives. The SPD will set out guidance on how this can be achieved.
- the designated sites in the following hierarchy are shown on the Policies Map or as subsequently updated:
- European sites: Special Protection Areas (SPA) and Special Areas of Conservation (SAC)
- National sites: Sites of Special Scientific Interest (SSSI)
- Local sites: Sites of Nature Conservation Importance (SNCI) and Local Nature Reserves.
- permission will not be granted for development proposals unless it can be demonstrated that doing so would not give rise to adverse effects on the integrity of European sites, whether alone or in combination with other development. Any development with a potential impact on SPA or SAC sites will be subject to a Habitats Regulations Assessment.
- permission will only be granted for development proposals within or adjacent to national sites where it can be demonstrated that doing so would not be harmful to the nature conservation interests of the site and its function as an ecological unit.
- permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity. Where this test is met, every effort must be made to reduce the harm to the site through avoidance and mitigation measures.

In addition, it is noted the policy P6 and P7 of the LPDMP deal with ecology and biodiversity respectively.

## Ecology

The site itself is subject to ecological designation given its location within the Surrey Hills AGLV. The nearest statutory designations off-site are the Wye Valley Meadows SSSI located approximately 300m to the south-east of the site and Pewley Down LNR located approximately 1.4km to the north-east of the site. The nearest non-statutory designation is The Mount, Guildford SNCI located approximately 650m to the north of the site. All of the ecological designations in the surrounding area are physically well separated from the site and are therefore unlikely to be adversely affected by the proposals. The Thames Basin Heaths SPA falls within 5km of the site, as such the proposed residential development must be mitigated through a combination of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM). This will be discussed in more detail in a separate section of the report.

The submitted Ecology Appraisal identifies habitats present within the site include buildings, hardstanding, amenity grassland, neutral semi-improved grassland, broad-leaved semi-natural woodland (including ancient woodland), pine plantation, water features, amenity grassland with scattered trees, clusters of trees, scrub, introduced shrub, lines of trees, an ornamental hedge, and individual trees. The site includes both developed areas, recently in active use as part of the university, and semi-natural habitats. The semi-natural habitats are mostly located around the site boundaries and in the southern and eastern portions of the site.

It is noted that a number of the habitats within the site are considered to be of ecological value within the immediate vicinity or local area. The block of ancient woodland on the site is considered to be of national importance. The site provides suitable habitat to support several protected species and groups including bats, reptiles, birds, badgers, hazel dormice, hedgehogs, and stag beetles.

## Bats

Five buildings (Braboeuf Manor, Cowshed, Squash Court, Summer House & Garden Cottage) were considered to have potential to support roosting bats and were subject to emergence/ re-entry survey.

Whilst there was variability between different nights and locations, typically a low to moderate level of bat activity was recorded at the site. A total of four different species were recorded across all the surveys. These were common pipistrelle, soprano pipistrelle, noctule, and serotine.

For the Summer House and Squash Court, whilst no licence is required, a precautionary approach to work is recommended as a result of surveys. For works to Braboeuf Manor, the Cowshed and Garden Cottage, a European Protected Species Mitigation Licence will be required as a result of surveys which indicated the presence of roosts of conservation importance.

Further, it is recommended that bat boxes are installed across the site to provide new roosting opportunities, and a bat-sensitive lighting plan is created, both can be secured by condition.

The Council's Ecology Consultant has reviewed proposals and confirm a precautionary approach to works is necessary alongside the bat mitigation licence from Natural England. The licence can only be applied for once planning permission has been granted.

### Reptiles

Following the Preliminary Ecological Appraisal, a reptile survey was recommended. This was undertaken with a focus on areas proposed to be developed. Both adult and juvenile slow-worms were found on site indicating successful breeding. No other reptile species were found.

It is recommended that a reptile translocation is carried out prior to the commencement of works. The on-site receptor area, the parkland to the east which is to be retained, is to be enhanced and managed for reptiles, to enable it to act as a suitable receptor site for a larger population of slow-worms. Enhancements should also be considered for the wider site in the form of the introduction of hibernacula, log piles and landscaping.

The Council's Ecology Consultant has reviewed proposals and recommend that a detailed Reptile Mitigation Strategy is secured through a planning condition.

### Badgers

The submitted Badger Survey Report identified the likely absence of active badger setts within and adjacent to the development site. However, signs of badger activity, including an outlier sett have been identified in proximity to the development site and so badgers are known to be present locally.

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.

The Council's Ecology consultant 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.

### Breeding birds

Surrey Wildlife Trust 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.

### Great Crested Newt

The applicant has submitted an environmental DNA (eDNA) report (October 2023) for two on-site ponds. The results of the surveys were negative, indicating the likely absence of great crested newt.

It is considered highly unlikely that great crested newts would use the site and therefore the risk to this species resulting from the proposed development is negligible. As such, it will not be necessary to obtain a mitigation licence or district licence with respect to great crested newts for the proposed development.

It is however recommended that a precautionary approach to vegetation clearance, under the supervision of a suitably experienced ecologist, is adopted to safeguard any herpetofauna that may be present in the working area. Surrey Wildlife Trust confirm, this is a valid approach for great crested newt.

### Hazel Dormice

The applicant has concluded, in the Preliminary Ecological Appraisal, that hazel dormouse presence/likely absence surveys are disproportionate and not required. Surrey Wildlife Trust note that the assessment is appropriate in scope and methodology, confirming that hazel dormouse do not appear to be a constraint on the site.

However, the Trust recommend that a Construction Environmental Management Plan and a Landscape and Ecological Management Plan should be secured through planning conditions if the application is approved. The Landscape and Ecological Management Plan would secure the recommendations for new hedgerow creation and woodland enhancement, outlined in the 'Response to Consultation Comments' by Phlorum (01 March 2024) and the Biodiversity Net Gain Assessment (Phlorum, October 2023).

### Invertebrates

The 'Response to Consultation Comments' by Phlorum (01 March 2024) provides further detail and support for their conclusions in the Preliminary Ecological Appraisal that invertebrate presence/likely absence surveys are disproportionate and not required. In review of the professional judgement by Phlorum, Surrey Wildlife Trust are satisfied.

However, a Landscape and Ecological Management Plan is recommended to be secured through planning condition. The Landscape and Ecological Management Plan could secure the recommendations for habitat creation and enhancement.

#### *Protected Habitats – Lowland Mixed Deciduous Woodland and Ancient Woodland*

Policy P6 of the LPDMP, Protecting Important Habitats and Species states that an appropriate buffer between new development and ancient woodland of a minimum of 15 metres is required.

At its closest Block D is proposed to be sited 9.1m away from the ancient woodland boundary. The building is to occupy a similar position to the existing Denning Building but has been set 1.4m further away from the Ancient Woodland boundary, offering an improvement to the current condition on site.

The Council's Tree Officer has reviewed proposals and confirmed that although Block D is proposed to be located within the 15m Ancient Woodland buffer, the proposed building is smaller than the existing building and within its footprint. This will mean that there is no new impact on the woodland.

Given there is no further impact from Block D than the existing (longstanding) relationship of the Denning Building, despite the clear conflict with Policy P6, owing to the existing on-site situation, proposals are considered appropriate in this regard.

#### *Biodiversity Net Gain*

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'.

Policy P7 of the LPDMP confirms that development proposals are required to seek maximum biodiversity gain on site.

Whilst there is now 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), the application pre-dates the requirement.

However, the submitted Biodiversity Net Gain Assessment details that the proposal has a feasibility to provide a net gain of 22.51% in habitat units and a 22.08% gain in hedgerow units. Biodiversity enhancements are to include;

- bird and bat boxes erected on or integral within the new building and/or on mature trees
- native hedgerows, scrub, and rough grassland corridors
- enhancement and creation of woodland
- native tree planting
- wildflower grassland



- biodiverse green roofs
- bioretention areas

The applicant has demonstrated that the proposal would achieve in excess of 20% net gain and is therefore compliant with the mandatory national requirement and local plan policies despite the application pre-dating the requirements.

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. The proposal would better the applicable requirements and the level of biodiversity net gain being achieved on the site as part of the development is something which weighs in favour of the proposal.

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

The site is heavily treed, is located within the St Catherines Conservation Area and contains woodland designated as Ancient Semi Natural Woodland.

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

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.

The submitted tree schedule identified a total of 245 individual trees and 23 groups of trees, all which have been categorised in accordance with the requirements of the British Standard (BS5837:2012) Trees in Relation to Design, Demolition and Construction. The British Standard states that trees in categories 'A', 'B' and 'C' are all a material consideration in the development process, and that the retention of category 'C' trees, being of low quality or of only limited or short-term potential, will not normally be considered necessary should they impose a significant constraint on development. For 'A' and 'B' grade trees they should be retained where possible and only proposed for removal when all other alternative options have been explored.

The proposed development would result in the removal of eighteen individual trees along with two hedges and the partial removal of two tree groups. All category A trees will be retained whereas four of the 160 existing Category B trees would be removed. The remaining trees to be removed would be Category C or U trees. No trees within the Ancient Woodland are to be removed.

The proposed Block D is to be located within the Ancient Woodland buffer however the proposed building is to be sited further from the Ancient Woodland than the existing building within this location. Through proposals, all development will be further from the

Ancient Woodland when compared to existing buildings on site. There is to be no new impact on the woodland and arguably, development would benefit the woodland as a result of this increased distance to built-form.

Extensive new planting is proposed to mitigate tree removal. Proposals allow for 155 trees and 596 metres of hedges to be planted, complemented by understorey planting and flower/grass mixes. Landscaping proposals are to be secured by condition.

The proposed development is supported by a Tree Survey and an Arboricultural Impact Assessment (AIA). All trees proposed to be removed are located internally within the site and their removal would not be visually apparent from outside of the site. While not desirable that a small number of Category B trees would be removed, the Council's Tree Officer agrees that in this case, proposals would not allow for their retention.

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.

Subject to the Tree Officer's recommended condition, as well as a condition to secure replacement planting via a landscape strategy, the proposed development would comply with the NPPF and Policies P6 and P7 of the LPDMP.

### **Climate change and sustainability**

Policy D2 of the LPSS states that new buildings must achieve a reasonable reduction in carbon emissions of at least 20 per cent below the relevant Target Emission Rate (TER) set out in Building Regulations 2010. It is noted that this should be achieved through the provision of appropriate renewable and low carbon energy technologies in the locality of the development and improvements to the energy performance of the building. Policy D2 is supplemented by the Council's Climate Change, Sustainable Design, Construction and Energy SPD 2024 which provides the framework for assessing the acceptability of sustainability and energy matters.

Policy D14 of the LPDMP notes that 'new dwellings must achieve an emission rate no higher than the relevant Target Emission Rate (TER) set out in the Building Regulations (Part L)'. Policy D15 also sets out the Council's climate change adaption policies and D16 and D17 deal with carbon emissions from buildings and renewable and low carbon energy generation and storage.

The applicant has submitted an Energy and Sustainability Statement with the application, the details of which will be discussed below.

### **Energy**

The Climate Change, Sustainable Design, Construction and Energy SPD 2024 sets out an energy hierarchy which is: eliminate energy need; use energy efficiently; supply energy from renewable and low carbon sources and offset carbon emissions. The applicant has confirmed that the submitted Energy Strategy has been developed using the energy hierarchy.

Passive design and energy efficiency measures form the basis for the reduction in overall energy demand and carbon emissions for the proposals. A fabric first approach to development has been adopted, with low U values sought. Mechanical Ventilation with Heat Recovery (MVHR) units are to supply tempered air to dwellings in order to ensure good indoor air quality whilst limiting the potential for condensation and mould growth. The MVHR units allow for the warmth in extracted air to be recovered and used in supply. A centralised Air Source Heat Pump system is proposed to be coupled with top-up electric boilers and Photovoltaic panels proposed to provide significant reduction in CO<sub>2</sub>.

It is anticipated that overall, up to a 65% reduction in CO<sub>2</sub> emissions can be achieved beyond the Building Regulations Part L 2021 baseline. This is deemed to be acceptable.

### Sustainability

The applicant's Sustainability Statement notes that the issue of sustainable development has been considered throughout the design of the proposed development. In particular, the incorporation of sustainable design and construction methods, energy and water saving measures, waste reduction techniques as well as measures to enhance the ecological value of the site, have been factored into the design of the scheme.

In terms of sustainability the following elements of the proposal are noted:

- energy strategy: The proposed development will target a 65% reduction in Regulated CO<sub>2</sub> emissions over the Part L 2021 baseline through energy efficiency measures, heating technology and renewable energy technologies.
- site layout and urban form: Design measures implemented across the site reduce shadowing, allow for natural ventilation and natural daylight, and maximise solar gain in winter.
- biodiversity and ecology: Enhancements will be implemented through the provision of landscaped areas and additional tree and shrub planting across the site.
- overheating: The scheme has been designed to ensure overheating risk is reduced to acceptable levels in accordance with CIBSE TM59:2017 requirements.
- inclusive access: 100% of the new dwellings will be designed to meet Building Regulations Approved Document M4(2) and 5% will meet Part M4(3) Clause 2a with respect to being adaptable to meet the needs of wheelchair users.
- water efficiency: Flow control devices and water efficient fixtures and fittings will be installed in all dwellings to target a maximum daily water consumption of 110 litres/person/day.
- flood risk and SUDs: The proposed development site lies in a low flood risk zone and will benefit from SUDs.
- sustainable transport: The site is accessible via public transport and sustainable modes will be encouraged through the provision of 39 cycle storage spaces and electric vehicle charging points.
- materials: Where practical, new building materials will be sourced locally to reduce transportation pollution and support the local economy. New materials will be selected based on their environmental impact and responsible suppliers will be used where possible.
- waste and recycling: Adequate facilities will be provided for domestic and construction related waste, including segregated bins for refuse and recycling.
- sustainable construction: The Principal Contractor will be required to maintain an ISO 14001 EMS standard, as well as ensure the site is registered with Considerate

Contractor Scheme upon commencement of work.

The Council's Planning Policy team have noted that whilst development proposes the demolition of existing buildings which creates a sustainability deficit relating to waste, embodied carbon and construction, buildings are to be retained where possible and will deliver a significant increase in dwellings (and ancillary units). An increase in the number of dwellings provides a sustainability benefit as the land is more efficiently used as well as the social sustainability benefit of providing homes which can weigh against the environmental harm of demolition and construction.

All commitments which are contained in the Energy and Sustainability Statement can be secured by condition.

Overall, the proposal meets the requirement of policy D2 of the LPSS, policies D14-17 of the LPDMP (as relevant) and the Climate Change, Sustainable Design, Construction and Energy SPD 2024.

### **The impact on the Thames Basin Heaths Special Protection Area**

The application site is located within the 400 metre to 5 kilometre buffer of the Thames Basin Heaths Special Protection Area (TBHSPA). Natural England advise that new residential development (C2 and C3) in 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 application proposes a net increase in residential units and as such has the potential, in combination with other development, to have a significant adverse impact on the protected site.

The Council has adopted the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD 2017 which provides a framework by which applicants can provide or contribute to Suitable Alternative Natural Greenspace (SANG) within the borough which along with contributions to Strategic Access Management and Monitoring (SAMM) can mitigate the impact of development.

The applicant proposes to mitigate the impact of this development via contributions to both SANG and SAMM. Natural England is satisfied that, subject to compliance with the adopted SPD, the impact of the development on the Thames Basin Heaths SPA can be appropriately mitigated.

Based on the adopted tariffs and the number and mix of units, the proposal generates a SAMM contribution of £115,008.58 and a SANG contribution of £861,571.03. The calculation reflects the contributions necessary to mitigate the impact of the proposed C2 development. Given that the sole C3 dwelling included in proposals is an existing dwelling, no contribution is required.

If the above mitigation was secured by way of a s.106 agreement, it is considered that the proposal would be compliant with the objectives of the TBHSPA Avoidance Strategy SPD 2017 and policy NRM6 of the South East Plan 2009.

### **S.106 legal agreement considerations**

The three tests as set out in Regulation 122(2) require s.106 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.

If all aspects of the application are deemed to be acceptable, then the following contributions would be secured by way of a s.106 agreement.

#### **Thames Basin Heaths SPA**

The development is required to mitigate its impact on the TBHSPA. The applicant has confirmed mitigation is to be secured via the payment of a financial contribution in line with the Council's adopted tariffs (as set out in the TBHSPA Avoidance Strategy SPD 2017 - currently SANG - £861,571.03 and SAMM – £115,008.58).

With the legal agreement in place, the proposal would accord with the TBHSPA Avoidance Strategy SPD 2017 and the advice provided by Natural England. Without this, the development would be unacceptable in planning terms and would fail to meet the requirements of the Habitat Regulations. The obligation is therefore necessary, directly related to the development and reasonable and therefore meets the requirements of Regulation 122.

#### **Primary Healthcare**

The ICB have reviewed the updated planning application and highlight that whilst the provision of specialist accommodation for older people can include a high level of personalised care and support, it also relies on health infrastructure in the local area including primary care facilities. The impact on healthcare infrastructure must therefore be considered in the same way as for self-contained residential accommodation. Residents coming forward from the provision of specialist accommodation for older people will require access to the full range of primary care services, and it is accepted that older patients place a higher demand on practices as evidenced by practices weighting patient demographics.

Due to the size of the proposed development and the primary healthcare floorspace requirement of 40sqm, on-site provision would not be sought on the proposed development site. An index linked S106 financial contribution will therefore be sought in lieu. primary care capital contribution of £241,298 which is based on the scale and nature of the proposed development.

The contribution would mitigate the impact of development and is considered necessary, directly related to the development and reasonable and therefore meets the requirement of Regulation 222.

#### **Highways**

The County Highway Authority have requested the following which would need to be secured through the legal agreement:

- a contribution of £50,000 towards highway improvements within the vicinity of the site.
- a contribution of £6,150 towards the auditing of the Travel Plan.
- A contribution of £30,000 towards unbound surfacing improvements to public footpaths within the vicinity of the site.
- the provision of an electric car club vehicle, with all costs associated with the provision of the vehicle including provision of parking space and pump priming being met by the developer.
- two year's free membership of the car club for all initial occupants of the residential units.
- an electric minibus service for the use of the residents of the development.
- Concierge/ valet parking service for the use of residents of the development.

It is considered that these requirements are directly related to the development, fair and reasonable in scale and necessary to make the proposed development acceptable in planning terms.

#### Other matters

There are also a number of other non-financial obligations within the legal agreement. These include the following:

C2 qualifying person criteria will be established in accordance with SCC Adult Social Care's Planning Guidance for Accommodation with Care for Older People. The requirements necessary for the provision of C2 accommodation will be secured with, for example, the provision of 24/7 on-site responders etc. In addition, management fees for C2 accommodation will be tied to care provision in accordance with relevant guidance.

Proposals include a number of on-site communal facilities as well as works to refurbish the Manor House and associated curtilage listed buildings. These are considered key benefits of the proposal and as such their delivery must be secured through the S106 agreement. An obligation will be secured to ensure timely delivery.

An obligation will also be secured which ensures proposed areas to be accessible to the public are provided. The applicant will be responsible for the management, maintenance and upkeep of both publicly accessible areas and resident amenity spaces within the scheme.

It is considered that these requirements are directly related to the development, fair and reasonable in scale and necessary to make the proposed development acceptable in planning terms.

#### Final balancing exercise

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be taken in accordance with the development plan unless material considerations indicate otherwise. This requires a broad judgement regarding whether the development accords with the plan read as a whole. Paragraph 11 of the NPPF also states that 'plans and decisions should apply a presumption in favour of sustainable development...For decision-taking this means...approving development proposals that accord with an up-to-

date development plan without delay'. While the proposal does conflict with some policies, overall and taken as a whole, the development is considered to accord with the development plan. This view takes into account the fact that some of the harms have already been assessed above in terms of their public benefit value and whether exceptional circumstances exist. Therefore, the presumption is that the application should be approved without delay.

Notwithstanding this, it is noted that the harm identified above must be considered and balanced against the benefits of the proposal. As already set out above, paragraph 208 of the NPPF requires a balance of the heritage harm against the public benefits of the scheme. That balance has been carried out above, and the conclusion that has been reached is that the public benefits of the scheme do outweigh the heritage harm. In addition, the report has also already addressed the requirements of paragraph 183 of the NPPF which states that in Areas of Outstanding Natural Beauty (now National Landscapes), '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 has already been concluded above that the proposal has demonstrated that exceptional circumstances exist and that the proposal would be in the public interest. However, the other harms resulting from the proposal must also be assessed, together with the heritage and National Landscape harm, and these should also be balanced against the benefits of the proposal. This final balancing exercise will be carried out below.

In assessing the weight to be afforded to harms / benefits, officers have applied a scale which attributes none, moderate, significant, or substantial weight to each identified harm / benefit. Having attributed such weight, an overall judgement is then required regarding the balance of harm vs benefit.

#### **Harms resulting from the proposal:**

##### *Heritage harm*

In accordance with paragraph 205 of the NPPF and the statutory tests, the less than substantial harm identified to designated heritage assets carries **substantial (great) weight and considerable importance** in the planning balance. Given the full analysis in relation to heritage harm above, that exercise is not repeated again here.

##### *National Landscape (AONB) and wider landscape / character harm*

In accordance with paragraph 182 of the NPPF, **substantial (great) weight** should also be given to the harm that the proposal would have on the Surrey Hills National Landscape and the impact on the wider landscape. This would also take into account the harm identified to the general character of the area, in particular the concerns regarding the bulk, scale and massing of Blocks G, H and J.

No other harms have been identified throughout the report.

#### **Benefits of the proposal:**

The benefits of the scheme have already been set out above. For ease of reference, the individual benefits resulting from the scheme will be summarised again below and a level

of weight attributed to them.

#### Boosting the Council's housing supply

While only one C3 residential dwelling is proposed as part of the development, the 131 C2 units would also count towards the Council's housing supply. Based on a ratio of 1.8 C2 units equalling one C3 dwelling, the proposal would equate to the provision of 73 dwellings to the Council's supply. It is considered that the supply of a relatively large number of dwellings would make a material contribution to the borough's supply of housing.

The proposal may also result in some 'freeing up' of existing residential dwellings when people move from their current properties into the proposed scheme. While this may be a benefit, it is acknowledged that the number of dwellings that may be released to the market as a result is difficult to quantify and is not a given.

Overall, **substantial weight** should be afforded to this benefit of the scheme.

#### Provision of C2 accommodation

The proposal provides a total of 131 C2 units. The Surrey County Council publication entitled 'Planning profile for accommodation with care for older people Guildford Borough' dated April 2024, confirms that there is a current need for 427 market extra care units in the Borough. By 2035, Surrey County Council explains that this need is projected to increase to 501 units.

While there has been some provision of C2 accommodation in the borough over recent years, even taking this into account there is still an evidenced need for more market extra care units to meet the demands of an ageing population.

The boost in the supply of 131 market extra care units should be afforded **substantial weight** in favour of the proposal.

#### Improvements to the site resulting from the proposal

The proposal would result in the demolition of most of the twentieth century buildings on the site which are of no particular architectural merit. While this factor in itself may not weigh heavily in favour of the proposal it is noted that the demolition of the existing administration building is seen as a positive aspect of the development. This building is currently awkwardly connected to the listed structure and harms its setting.

In addition, the proposal seeks to restore the Manor as well as a number of other curtilage listed buildings and structures within the grounds. All of these structures have been vacant since summer 2024 and are now experiencing various stages of disrepair. Notwithstanding the identified harm to the setting of Braboeuf Manor, the improvements and restoration of these buildings should be afforded **substantial weight** in favour of the proposal.



### Economic benefits

The proposal would result in some economic benefits to the local economy by redeveloping the site. These would arise from the operation of the facility itself, through for example new jobs, increased spending power in the town due to additional residents etc. The proposal would also result in temporary economic benefits during construction.

However, the level of this economic benefit has not been fully quantified by the applicant. **Moderate weight** is afforded to this matter.

### Public access

The proposal seeks to allow access to the large open space area to the front of the site as well as granting access to Braboeuf Manor for public groups and organisations who will be able to book spaces within the building. This would be secured through the legal agreement.

Allowing the public and public groups to access the grounds and the Manor itself should be afforded **moderate weight**.

### Biodiversity and ecology benefits

The submitted Biodiversity Net Gain Assessment details that the proposal will provide a net gain of 22.51% in habitat units and a 22.08% gain in hedgerow units. Although a biodiversity net gain is required by policy, the proposal would be slightly in excess of the Council's requirement.

**Moderate weight** is afforded to the benefit of this aspect of the application.

### Energy and sustainability benefits

The proposal would be a fully electric development, thereby reducing the reliance on fossil fuels for energy. Through the use of Mechanical Ventilation with Heat Recovery (MVHR), a centralised Air Source Heat Pump system, coupled with top-up electric boilers and Photovoltaic panels the development is expected to achieve a 65% reduction in CO2 emissions beyond the Building Regulations Part L 2021 baseline.

In addition, the other sustainability benefits of the scheme have been set out above which include the provision of EV charging, and sustainable transport options for residents including an on-site mini-bus service and car club.

The benefits of reducing carbon emissions, well above the Part L 2021 baseline are obvious in terms of climate change and are afforded **significant weight**.

### Re-use of brownfield land

The application site currently vacant and has been since summer 2024. The University of Law have vacated the site and they no longer retain an interest in the site. The existing buildings are all unoccupied and while the site is secure, it is now starting to fall into disrepair.

Paragraph 124(c) of the NPPF states that 'planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land'.

The proposal would re-use brownfield land for housing and would remediate a site which is now in the very early stages of becoming degraded and potentially derelict through lack of use.

The redevelopment of the site is considered to be compliant with this important aspect of the NPPF and therefore **substantial weight** should be afforded to this aspect of the proposal.

### **Overall planning balance and conclusion**

Overall, the benefits of the proposal are wide ranging and long lasting. The existing site is now vacant and will continue to slide into decline without a realistic development opportunity coming forward. This would include the listed building and its curtilage structures. It has been noted above that it is very unlikely that the site will be used again for educational purposes and therefore, another use will need to be found for the site.

In terms of the harm resulting from the proposal it has been noted above that the public benefits of the scheme would outweigh the heritage harm which has been identified to the setting of Braboeuf Manor and to the character and significance of St Catherines Conservation Area. However, nonetheless, great weight and considerable importance must be afforded to this issue.

The proposal would also result in harm to the Surrey Hills National Landscape. However, as also noted above, the Council believe that exceptional circumstances have been demonstrated and that the development is in the public interest. It is noted that the site is already heavily developed by large, bulky buildings and while the proposal would be more visible than the existing situation. Notwithstanding this, substantial (great weight has been afforded to this harm).

On the other hand, the proposal would result in the redevelopment of a brownfield site which is already occupied by a large number of buildings. The proposal would also arrest the continued dereliction of the site, including the listed building.

The proposal would also add the equivalent of 73 dwellings to the Council's supply and would provide 131 units of C2 extra care accommodation. The applicant has submitted their own needs assessment with the application and the result of this (that there is a need for additional market extra care units in the borough) has recently been confirmed by SCC.

The proposal would also result in restoration works to Braboeuf Manor and its associated curtilage listed buildings. The proposed works would safeguard the structures for the immediate future, giving them a new use and purpose.

The proposal would also have the added benefits of allowing public access to part of the site and the manor itself and biodiversity and sustainability benefits which are in excess of what the Council usually seeks through the Local Plan.

Overall, it is considered that the benefits associated with the proposal do outweigh the identified harm, including harm to designated heritage assets and the National Landscape. The proposal accords with the development plan read as a whole and other material considerations do not weigh against the grant of planning permission. As such, the proposal is deemed to be acceptable and is therefore recommended for approval, subject to the recommended conditions and the completion of a legal agreement.

## **RECOMMENDATION**

### **Planning permission should be GRANTED, subject to:**

(i) The conditions set out below.

(ii) That a s.106 agreement be entered into to secure:

- primary healthcare contribution;
- highways contribution;
- SANG (Suitable Alternative Natural Green Space) contribution;
- SAMM (Strategic Access Management and Monitoring) contributions;
- Identifying Use Class C2 accommodation qualifying person criteria & associated services to be provided.
- securing the implementation and operation of the residents electric mini-bus, to be provided in perpetuity;
- securing the implementation and provision of resident's concierge parking service, to be provided in perpetuity;
- securing the implementation and operation of a car-club and the provision of a car-club vehicle for the use of residents;
- securing the renovation and restoration, as per the approved plans, of Braboeuf Manor and its associated curtilage listed buildings in accordance with agreed timeframes;
- securing the provision of public and communal facilities, as per the approved plans, in accordance with agreed timeframes; and
- securing free and unfettered public access to the grounds (those to the front of the site) and that Braboeuf Manor is open and freely accessible to the public and public groups under terms to be agreed.

If the terms of the s.106 or wording of the planning conditions are materially amended as part of ongoing s.106 or planning condition(s) negotiations, any changes are delegated to the Joint Assistant Director of Planning.

(iii) 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.

(iv) If, after 12 months has elapsed since the resolution of the Planning Committee to grant planning permission, the s.106 agreement is not completed then the Joint Head of Planning may refuse the application on the basis that the necessary mitigations to offset the impact of the development cannot be secured.

## 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 approved plans noted in Appendix 1.

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

3. No above ground works (with the exception of site clearance, demolition excavation, drainage, utilities, site roads, erection of fencing, laying of temporary surfaces, erection of temporary site buildings for construction purposes and ground works) shall take place on a particular block until details and samples of the proposed external facing and roofing materials for the given block, including colour and finish, have been submitted to and approved in writing by the Local Planning Authority. The proposed materials shall be in accordance with those set out in the Design and Access Statement. 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.

4. No above ground works (with the exception of site clearance, demolition excavation, drainage, utilities, site roads, erection of fencing, laying of temporary surfaces, erection of temporary site buildings for construction purposes and ground works) shall take place on a particular block until a sample panel for the given block 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.

5. No above ground works (with the exception of site clearance, demolition excavation, drainage, utilities, site roads, erection of fencing, laying of temporary surfaces, erection of temporary site buildings for construction purposes and ground works) shall take place on a particular block until details of the design, construction and material of the balconies, Juliet balconies, windows and doors for the given block have been submitted to and approved in writing by the Local Planning Authority. The proposed materials shall be in accordance with those set

out in the Design and Access Statement. The submitted details shall include the depth of reveal, method of opening, details of head, side casing and cills. The development shall only be carried out in accordance with the approved details.

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

6. No above ground works (with the exception of site clearance, demolition excavation, drainage, utilities, site roads, erection of fencing, laying of temporary surfaces, erection of temporary site buildings for construction purposes and ground works) shall take place on a particular block until details and drawings of all proposed vents, flues, downpipes, satellite dishes, all roof plant and machinery and lift over-runs for the given block 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.

7. No above ground works (excluding operations including site preparation, demolition, excavation and enabling works) shall take place in a publicly accessible zone or a semi- publicly accessible zone until a Public Realm Strategy for that zone has been submitted to and approved in writing by the Local Planning Authority. For the avoidance of doubt, the Strategy will apply to each of the public realm areas (including semi-publicly accessible areas and all pedestrian routes). The Strategy shall include details, drawings and samples (where required) of the hard landscaping, site signage, all street furniture, lighting and any boundary treatments (including any gates, walls and fences). The proposals shall also include details of containers, planting pits and planting trenches, water harvesting, irrigation and drainage. The proposals shall also include exact details and drawings of all street tree planting pits showing how trees will be planted in within the public realm to ensure that they have adequate room to grow and thrive within the development. The Strategy shall include a zoning plan for the delivery of the agreed works. The development shall only be carried out in full accordance with the agreed details, including the agreed zoning plan.

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

8. Within each zone, the residential blocks hereby approved shall not be occupied until full details, of both hard and soft landscape proposals for the residential amenity spaces and roof gardens for each block, 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 containers, planting pits and planting trenches, roof planting build up, solar grow lights (where required), water harvesting, irrigation and drainage. The proposals shall

also include exact details and drawings of all tree planting pits showing how trees will be planted to ensure that they have adequate room to grow and thrive within the development. 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 the relevant block and retained thereafter.

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

9. 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 block or the completion of the development, whichever is the sooner. Any trees or plants which, within a period of five years after planting, are removed, die or become seriously damaged or diseased in the opinion of the Local Planning Authority, shall be replaced in the next available planting season with others of similar size, species and number, unless otherwise agreed in writing by the Local Planning Authority.

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

10. The development hereby approved shall be based upon the principles of Secured by Design (physical security) and the Park Mark Safer Parking Scheme, or the Building Regulations equivalent, and the scheme shall be implemented in accordance with those principles.

Reason: To ensure that the development is acceptable in terms of crime and safety.

11. The development hereby permitted shall not commence (with the exception of site clearance, demolition, erection of fencing, laying of temporary surfaces, erection of temporary site buildings for construction purposes and ground works), until details of the design of a surface water drainage scheme have 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.
- b) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+45% allowance for climate change) storm events, during all stages of the development.
- c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.). 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.

d) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.

e) Details of drainage management responsibilities and maintenance regimes for the drainage system.

f) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

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

12. The refurbishment of any existing retained buildings and associated infrastructure hereby permitted shall not commence (with the exception of strip out of existing retained buildings) until details of the design of a surface water drainage scheme have 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) Evidence that the existing on-site soakaways and drainage network are fit for purpose.

b) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.

c) Details of drainage management responsibilities and maintenance regimes for the drainage system.

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

13. Prior to the first occupation of each zone of the development, a verification report carried out by a qualified drainage engineer 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), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

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

14. No development shall be occupied until confirmation has been provided that either: -

1. Surface water capacity exists off site to serve the development. Or,

2. A development and infrastructure phasing plan has been agreed with

the Local Planning Authority. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or,

3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed.

Reason: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning).

15. No development shall be occupied until confirmation has been provided that either: -

1.all water network upgrades required to accommodate the additional demand to serve the development have been completed; or

2 a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

16. The development hereby approved shall only be carried out in full accordance with the submitted Energy and Sustainability Statement (dated 04 September 2024, prepared by Hoare Lea).

Reason: To reduce carbon emissions and incorporate sustainable energy as part of the development.

17. No above ground works (excluding operations including site preparation, demolition, excavation and enabling works) shall take place in a relevant zone until information is submitted to and approved in writing by the Local Planning Authority which demonstrates how each of the approved buildings has achieved a 'fabric first' approach in line with the energy hierarchy. The submitted information shall include design-stage SAP reports covering a sample of 20% of the C2 units and BRUKL reports for the non-residential buildings. The approved details shall be implemented prior to the first occupation of each of the dwellings and retained as operational thereafter.

Reason: To reduce carbon emissions and incorporate energy efficiency.

18. The residential development hereby permitted must comply with regulation 36 paragraph 2(b) of the Building Regulations 2010 (as amended) to achieve a water efficiency of 110 litres per occupant per day



(described in part G2 of the Approved Documents 2015). Prior to first occupation of each block, a water efficiency statement shall be submitted to and approved in writing by the Local Planning Authority. This shall include details of water management measures and demand reduction measures. No part of the development hereby approved shall be occupied until a copy of the water efficiency calculator for new dwellings' worksheet that accords with Part G of the building regulations' Approved Documents has been submitted to and approved in writing by the Local Planning Authority for each new dwelling and C2 unit. The units shall be constructed in accordance with the approved details and thereafter maintained.

Reason: To secure a satisfactory development that meets optional technical standards (having regard to part G2 of the Approved Documents 2015 to the Building Regulations) by improving water efficiency, responding to climate change and the waste hierarchy

19. Before the development hereby approved is commenced a Site Waste Management Plan (SWMP) shall be submitted to and approved in writing by the Local Planning Authority. The SWMP must accord with DEFRA Non-statutory guidance for site waste management plans (2008). 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 that the development takes waste hierarchy into account to manage waste. It is considered necessary for this to be a pre-commencement condition because waste will begin to be generated as soon as any development commences on the site.

20. 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.

21. Prior to the commencement of the development hereby approved, a Landscape and Ecological Management Plan (covering a 30 year period in accordance with Biodiversity Net Gain) which shall include (but not limited to) details of the schedule of works, habitat creation, number and location of bat and bird boxes, number and location of bee bricks, location and details of habitat piles, shall be submitted to and approved in writing by the Local Planning Authority. All approved details shall then be implemented and retained in full and in accordance with the agreed timings and details.

Reason: To safeguard protected species and ecology.

22. Prior to i) demolition and / or ii) construction works, a Construction Environmental Management Plan (CEMP) for such works shall be submitted to, and approved in writing by, the Local Planning Authority. The approved CEMP for the demolition and construction works (as applicable) shall be adhered to throughout the relevant period of works. The CEMP shall provide for:

- (a) an indicative programme for carrying out of the works
- (b) the arrangements for public consultation and liaison during the construction works
- (c) measures to minimise the noise and vibration generated by the construction process to include hours of work, proposed method of piling for foundations, the careful selection of plant and machinery and use of noise mitigation barrier(s)
- (d) details of any floodlighting, including location, height, type and direction of light sources and intensity of illumination
- (e) loading and unloading of plant and materials
- (f) storage of plant and materials used in constructing the development
- (g) measures to control the emission of dust, dirt and run-off during construction
- (h) measures to control the impact on hydrology of the locality

Reason: To ensure that satisfactory measures are put in place to protect the environment during the construction period. It is considered necessary for this to be a pre-commencement condition because the management of the construction needs to be considered before construction commences.

23. The mitigation and enhancement measures identified within the Preliminary Tree Roost Assessment (Phlorum, March 2024), Reptile Survey Report (Phlorum, November 2023), Badger Survey Report (Phlorum, November 2023) and the Preliminary Ecological Appraisal (Phlorum, October 2023), shall be implemented in full and in accordance with a timetable which shall be submitted to and approved in writing by the Local Planning Authority before the commencement of the development hereby approved.

Reason: To safeguard protected species, to increase the biodiversity of the site and mitigate any impact from the development.

24. The development hereby approved shall not be first occupied/opened for use unless and until the following S278 works have been provided:

- The provision of tactile paving on Chestnut Avenue, at the junction with Portsmouth Road; and
- Improvements to the two closest bus stops by the site, to include accessible kerbing, RTPI display provision, and shelter provision/improvements.

To be in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the development should not prejudice highway

safety nor cause inconvenience to other highway users and to promote sustainable forms of transport.

25. The development hereby approved shall not be first occupied/opened for use unless and until a high quality, lit, stepped access route with cycle wheeling ramp has been provided between the site and Sandy Lane, and a high quality, lit, step free pedestrian/ cycle route has been provided between the site and site access. To be in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority and thereafter shall be retained and maintained for its designated purpose.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport.

26. The development hereby approved shall not be first occupied/opened for use unless and until the proposed vehicular access arrangements to Portsmouth Road hereby approved have been constructed and provided with visibility zones in accordance with the approved plans and thereafter the visibility zones shall be kept permanently clear of any obstruction over 0.6m high.

Reason: in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport

27. The development hereby approved shall not be first occupied/opened for use unless and until space has been laid out within the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority 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 that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport

28. Prior to demolition a Demolition Transport Management Plan, to include details of:

- (a) parking for vehicles of site personnel, operatives and visitors
- (b) loading and unloading of plant and materials
- (c) storage of plant and materials
- (d) programme of works (including measures for traffic management)
- (e) provision of boundary hoarding behind any visibility zones
- (f) HGV deliveries and hours of operation
- (g) vehicle routing
- (h) measures to prevent the deposit of materials on the highway
- (i) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
- (j) no HGV movements to or from the site shall take place between the

hours of 8.30 and 9.15 am and 3.15 and 4.00 pm nor shall the contractor permit any HGVs associated with the development at the site to be laid up, waiting, in Portsmouth Road and Sandy Lane during these times

(k) on-site turning for construction vehicles

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the demolition of the development.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport

29. Prior to construction a Construction Transport Management Plan, to include details of:

(a) parking for vehicles of site personnel, operatives and visitors

(b) loading and unloading of plant and materials

(c) storage of plant and materials

(d) programme of works (including measures for traffic management)

(e) provision of boundary hoarding behind any visibility zones

(f) HGV deliveries and hours of operation

(g) vehicle routing

(h) measures to prevent the deposit of materials on the highway

(i) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused

(j) no HGV movements to or from the site shall take place between the hours of 8.30 and 9.15 am and 3.15 and 4.00 pm nor shall the contractor permit any HGVs associated with the development at the site to be laid up, waiting, in Portsmouth Road and Sandy Lane during these times

(k) on-site turning for construction vehicles

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport

30. The details within the approved Travel Plan shall be implemented upon first occupation/first use of the development and thereafter shall be maintained and developed to the satisfaction of the Local Planning Authority.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport

31. The development hereby approved shall not be first occupied/opened for use unless and until fast-charge Electric Vehicle charging points (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) have been provided within the site. Details of which shall be submitted and approved in writing by the Local Planning Authority and thereafter retained and maintained

to the satisfaction of the Local Planning Authority.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport.

32. The development hereby approved shall not be first occupied unless and until facilities for high quality, secure, lit and covered parking of bicycles and the provision of a charging point with timer for e-bikes by said facilities have been provided within the development site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority and thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport

33. If contamination of a type which has not been identified within the contaminated land site investigation and risk assessment is found at any time when carrying out the approved development, it must be reported in writing to the Local Planning Authority. Development on the part of the site affected shall be suspended and an investigation and risk assessment must be undertaken to deal with contamination of land and/or groundwater, and where remediation is necessary a remediation scheme must be prepared to ensure that the site is suitable for the intended use (by removing unacceptable risks to human health, buildings and other property and the natural and historical environment). Following completion of the remediation scheme a verification report that demonstrates the effectiveness of the remediation carried out must be prepared and submitted for approval in writing by the Local Planning Authority. These approved schemes shall be carried out before the development is resumed or continued.

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

34. Prior to the commencement of the development a contaminated land site investigation and risk assessment, undertaken in accordance with the approved site investigation proposal, that determines the extent and nature of contamination on site and reported in accordance with the British Standard BS 10175, shall be submitted to and approved in writing by the Local Planning Authority. If applicable, ground gas risk assessments should be completed in line with BS 8485 guidance. Any remediation required shall be fully detailed to restore the site to a standard suitable for use.

Reason: To ensure that risks from land contamination to the future users

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

35. Any remediation scheme submitted in accordance with the above condition shall be carried out as detailed in the submitted contaminated land site investigation and risk assessment. Documentary proof shall be provided to the Local Planning Authority together with a quality assurance certificate to show that the works have been carried out in full accordance with the approved remediation strategy. Details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria shall be included in the closure report together with the necessary documentation detailing what waste material has been removed from the site before the first occupation of the units hereby permitted.

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

36. Works related to the construction of the development hereby permitted, including works of demolition or preparation prior to building operations, shall not take place other than between the hours of 0830 and 1800 Mondays to Fridays and between 0830 and 1330 Saturdays and at no time on Sundays or Bank or National Holidays.

Reason: To protect the neighbours from noise and disturbance outside the permitted hours during the construction period.

37. Prior to first occupation of the development hereby approved, details of the proposed lighting scheme shall be submitted to and approved in writing by the Local Planning Authority. The proposed lighting shall comply with the Bat Conservation Trust's document 'Bats and Lighting in the UK - Bats and the Built Environment Series' and the Institute of Lighting Professional's Guidance Note 08/18 Bats and Artificial Lighting in the UK (2018). The lighting shall be carried out in accordance with the approved details.

Reason: To limit the impact of light pollution from artificial light on protected species.

38. The applicant should ensure that any air handling plant, fixed, mechanical, electrical or hydraulic equipment etc, installed and operated at any time in connection with the carrying out of this permission should not produce broadband noise that is clearly audible at the boundary of any noise sensitive premises. Noise from operating plant shall therefore not exceed the existing background noise level (LA90) at any time. At no time should there be any tonal or acoustic features of the operating machinery that will increase the existing residual noise level so as to be

clearly audible at the boundary of any nearby noise sensitive premises. A regular and routine maintenance programme should be employed to ensure operational plant does not increase noise output due to mechanical wear or defect that will result in any unit failing to meet the above noise criteria.

Reason: In order to protect residential amenity.

39. No demolition shall take place until an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) for demolition works, in accordance with BS 5837:2012 Trees in Relation to Design, Demolition and Construction, are submitted to and approved in writing by the Local Planning Authority. The approved Arboricultural Method Statement must be adhered to in full and may only be modified subject to written agreement from the Local Planning Authority.

Reason: To retain and protect the existing trees which form an important part of the amenity of the locality.

40. No construction shall take place until an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) for construction works, in accordance with BS 5837:2012 Trees in Relation to Design, Demolition and Construction, are submitted to and approved in writing by the Local Planning Authority. The approved Arboricultural Method Statement must be adhered to in full and may only be modified subject to written agreement from the Local Planning Authority.

Reason: To retain and protect the existing trees which form an important part of the amenity of the locality.

41. No development, or site preparation shall take place until a person qualified in arboriculture, and approved by the Local Planning Authority, has been appointed to supervise construction activity occurring on the site. The Arboricultural Supervisor will be responsible for the implementation of protective measures, special surfacing, and all works deemed necessary to ensure compliance with the approved Arboricultural Method Statement and Tree Protection Plan.

Reason: To retain and protect the existing trees which form an important part of the amenity of the locality.

42. Before any equipment, materials or machinery are brought onto the site for the purposes of development, a pre-commencement site meeting between the Tree Officer, retained Arboricultural Supervisor and Site Manager shall take place to confirm the protection of trees on and adjacent to the site in accordance with approved Arboricultural Method Statement and Tree Protection Plan. The tree protection shall be positioned as shown on the Tree Protection Plan, before any equipment, materials or machinery are brought onto the site for the purposes of the development. The tree protection shall be retained until the development is completed and nothing shall be placed within the fencing, nor shall any ground levels be altered, or excavations made without the written consent

of the Local Planning Authority. This condition may only be fully discharged on completion of the development subject to satisfactory written evidence of monthly monitoring and compliance by the pre-appointed Arboricultural Supervisor.

Reason: To retain and protect the existing trees which form an important part of the amenity of the locality.

43. Prior to the first occupation of the development, details of the educational signboard to be placed adjacent to Public Right of Way 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 location
- (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 signboard would be maintained and repaired.

The approved signboards shall be constructed as agreed prior to first occupation of any zone 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.

44. Prior to the first occupation of the development, details of the bespoke timber seating to be placed within publicly accessible parkland 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 location
- (b) The size and design of the seating
- (c) Details of how the seating would be maintained and repaired.

The approved seating shall be constructed as agreed prior to first occupation of any zone of the development and maintained and retained in perpetuity.

Reason: to provide opportunity to observe the special qualities of the Surrey Hills National Landscape.

45. The use of the Cow Shed for guest accommodation as approved shall be limited to stays for each guest(s) of no more than three consecutive nights. The accommodation shall only be available to guests of residents of the site.

Reason: The Local Planning Authority wishes to retain control over the use of the guest accommodation in order to protect the amenity of residential properties.



## INFORMATIVES

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

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

In this case pre-application advice was sought and was provided during a lengthy process. This addressed some issues with the proposal. The applicant has also made positive amendments to the proposal during the life of the application which also addressed concerns raised by officers. In all, the development is now considered to be acceptable.

2. The applicant is advised to review the informatives which have been recommended by the consultees, including, but not limited to Thames Water, the LLFA and the County Highway Authority.

Appendix 1 – Approved Plans – Application 23/P/01850

	<b>Drawing Title</b>	<b>Revision</b>	<b>Issue date</b>
<b>Masterplan</b>			
GU-APT-ZZZ-ZZZZ-DR-A-PL-0010	Masterplan - Location Plan	P01	01/11/23
GU-APT-ZZZ-ZZZZ-DR-A-PL-0011	Masterplan - Existing Site Plan	P01	01/11/23
GU-APT-ZZZ-ZZZZ-DR-A-PL-0012	Masterplan - Existing Topographic Plan	P01	01/11/23
GU-APT-ZZZ-ZZZZ-DR-A-PL-0070	Masterplan - Demolition Plan	P01	01/11/23
GU-APT-ZZZ-ZZZZ-DR-A-PL-0100	Masterplan - Proposed Site Block Plan	P02	26/07/24
GU-APT-ZZZ-ZZZZ-DR-A-PL-0200	Masterplan - Proposed Sections AA & BB	P02	26/07/24
GU-APT-ZZZ-ZZZZ-DR-A-PL-0201	Masterplan - Proposed Sections CC & DD	P02	26/07/24
GU-APT-ZZZ-ZZZZ-DR-A-PL-0202	Masterplan - Proposed Sections EE, FF & GG	P02	26/07/24
<b>ZONE 1</b>			
<b>Block A</b>			
GU-APT-1AA-ZZZZ-DR-A-PL-0100	Block A - Proposed Plans	P02	26/07/24
GU-APT-1AA-ZZZZ-DR-A-PL-0200	Block A - Proposed Sections & Elevations	P02	26/07/24
<b>Block B</b>			
GU-APT-1BB-ZZZZ-DR-A-PL-0100	Block B - Proposed Plans	P02	26/07/24
GU-APT-1BB-ZZZZ-DR-A-PL-0200	Block B - Proposed Sections & Elevations	P02	26/07/24
<b>Block D</b>			
GU-APT-1DB-ZZZZ-DR-A-PL-0040	The Denning Building - Existing Plans	P01	01/11/23

Appendix 1 – Approved Plans – Application 23/P/01850

GU-APT-1DB-ZZZZ-DR-A-PL-0050	The Denning Building - Existing Sections & Elevations	P01	01/11/23
GU-APT-1DD-ZZZZ-DR-A-PL-0100	Block D - Proposed Plans	P02	26/07/24
GU-APT-1DD-ZZZZ-DR-A-PL-0200	Block D - Proposed Sections & Elevations	P02	26/07/24
<b>Block P</b>			
GU-APT-1PP-ZZZZ-DR-A-PL-0100	Block P - Proposed Plans & Elevations	P01	22/07/24
<b>Administration Block</b>			
GU-APT-1AB-ZZZZ-DR-A-PL-0040	Administration Building - Existing Plans	P01	01/11/23
GU-APT-1AB-ZZZZ-DR-A-PL-0050	Administration Building - Existing Sections & Elevations	P01	01/11/23
<b>Braboeuf Manor</b>			
GU-APT-1BM-ZZZZ-DR-A-PL-0040	Braboeuf Manor - Existing Plans	P01	01/11/23
GU-APT-1BM-ZZZZ-DR-A-PL-0050	Braboeuf Manor - Existing Sections & Elevations	P01	01/11/23
GU-APT-1BM-ZZZZ-DR-A-PL-0070	Braboeuf Manor - Demolition Plans	P01	01/11/23
GU-APT-1BM-ZZZZ-DR-A-PL-0071	Braboeuf Manor - Demolition Sections & Elevations	P01	01/11/23
GU-APT-1BM-ZZZZ-DR-A-PL-0100	Braboeuf Manor - Proposed Plans	P03	14/11/24
GU-APT-1BM-ZZZZ-DR-A-PL-0200	Braboeuf Manor - Proposed Sections & Elevations	P03	14/11/24
GU-APT-1BM-ZZZZ-DR-A-PL-0500	Braboeuf Manor - Interior Detail Section	P01	14/11/24
<b>Cowshed</b>			

Appendix 1 – Approved Plans – Application 23/P/01850

GU-APT-1CS-ZZZZ-DR-A-PL-0040	Cowshed - Existing Plans, Sections & Elevations	P01	01/11/23
GU-APT-1CS-ZZZZ-DR-A-PL-0100	Cowshed - Proposed Plans, Sections & Elevations	P02	26/07/24
<b>Pound Cottage</b>			
GU-APT-1PC-ZZZZ-DR-A-PL-0040	Pound Cottage - Existing Plans, Sections & Elevations	P01	01/11/23
GU-APT-1PC-ZZZZ-DR-A-PL-0070	Pound Cottage - Demolition Plans	P01	01/11/23
GU-APT-1PC-ZZZZ-DR-A-PL-0100	Pound Cottage - Proposed Plans, Sections & Elevations	P02	14/11/24
<b>Summer House &amp; Workshop</b>			
GU-APT-1SH-ZZZZ-DR-A-PL-0040	Summer House & Workshop - Existing Plans, Sections & Elevations	P01	01/11/23
GU-APT-1SH-ZZZZ-DR-A-PL-0070	Summer House & Workshop - Demolition Plans, Sections & Elevations	P01	01/11/23
GU-APT-1SH-ZZZZ-DR-A-PL-0100	Summer House & Workshop - Proposed Plans, Sections & Elevations	P01	01/11/23
<b>ZONE 2</b>			
<b>Garden Cottage</b>			
GU-APT-2GC-ZZZZ-DR-A-PL-0040	Garden Cottage - Existing Plans, Sections & Elevations	P01	01/11/23

Appendix 1 – Approved Plans – Application 23/P/01850

GU-APT-2GC-ZZZZ-DR-A-PL-0070	Garden Cottage - Demolition Plans	P02	14/11/24
GU-APT-2GC-ZZZZ-DR-A-PL-0100	Garden Cottage - Proposed Plans, Sections & Elevations	P02	14/11/24
<b>Fountain Court</b>			
GU-APT-2FC-ZZZZ-DR-A-PL-0040	Fountain Court - Existing Plans	P01	01/11/23
GU-APT-2FC-ZZZZ-DR-A-PL-0050	Fountain Court - Existing Sections & Elevations	P01	01/11/23
<b>Learning Resource Centre</b>			
GU-APT-2LC-ZZZZ-DR-A-PL-0040	Learning Resource Centre - Existing Plans	P01	01/11/23
GU-APT-2LC-ZZZZ-DR-A-PL-0050	Learning Resource Centre - Existing Sections & Elevations	P01	01/11/23
<b>Block G</b>			
GU-APT-2GG-ZZZZ-DR-A-PL-0100	Block G - Proposed Lower Ground, Ground Floor, Level 01 & 02 Plans	P02	26/07/24
GU-APT-2GG-ZZZZ-DR-A-PL-0101	Block G - Proposed Level 03 & Roof Plan	P02	26/07/24
<b>Block H</b>			
GU-APT-2HH-ZZZZ-DR-A-PL-0100	Block H - Proposed Lower Ground, Ground Floor, Level 01 & 02 Plans	P02	26/07/24
GU-APT-2HH-ZZZZ-DR-A-PL-0101	Block H - Proposed Level 03, 04 & Roof Plans	P02	26/07/24
<b>Block J</b>			
GU-APT-2JJ-ZZZZ-DR-A-PL-0100	Block J - Proposed Lower Ground, Ground Floor, Level 01 & 02 Plans	P02	26/07/24

Appendix 1 – Approved Plans – Application 23/P/01850

GU-APT-2JJ-ZZZZ-DR-A-PL-0101	Block J - Proposed Level 03, 04 & Roof Plans	P02	26/07/24
<b>Zone 2 Overview</b>			
GU-APT-2ZZ-ZZZZ-DR-A-PL-0200	Zone 2 - Overview - Proposed Section AA & BB	P02	26/07/24
GU-APT-2ZZ-ZZZZ-DR-A-PL-0201	Zone 2 - Overview - Proposed Section CC, DD & EE	P02	26/07/24
GU-APT-2ZZ-ZZZZ-DR-A-PL-0300	Zone 2 - Overview - Proposed North Elevation	P02	26/07/24
GU-APT-2ZZ-ZZZZ-DR-A-PL-0301	Zone 2 - Overview - Proposed South Elevation	P02	26/07/24
GU-APT-2GG-ZZZZ-DR-A-PL-0302	Zone 2 - Block G - Proposed East & West Elevation	P02	26/07/24
GU-APT-2HH-ZZZZ-DR-A-PL-0303	Zone 2 - Block H - Proposed East & West Elevation	P02	26/07/24
GU-APT-2JJ-ZZZZ-DR-A-PL-0304	Zone 2 - Block J - Proposed East & West Elevation	P02	26/07/24
<b>Typical Apartment Types</b>			
GU-APT-XXX-XXXX-DR-A-PL-0400	Typical Apartments- 2B	P01	26/07/24
GU-APT-XXX-XXXX-DR-A-PL-0401	Typical Apartments - 1B	P01	26/07/24
GU-APT-XXX-XXXX-DR-A-PL-0402	Typical Apartments - 1B & 3B	P01	26/07/24