App No: 24/P/00808 **8 Wk Deadline:** 07/10/2025
Appn Type: Full Application
Case Officer: Jessica Riches
Parish: Merrow **Ward:** Merrow
Agent : Mrs Waterfield
Lytle Associates Architects
20 Quarry Street
Guildford
GU1 3UY

Applicant: The Diocese Of Arundel & Brighton
St Peters Roman Catholic
Comprehensive School
Horseshoe Lane East
Guildford
Surrey
GU1 2TN

Location: St Peters Roman Catholic Comprehensive School, Horseshoe Lane East, Guildford, GU1 2TN

Proposal: Two storey extension to provide a drama studio, hospitality space, PE classroom and changing facilities, construction of an all weather sports pitch together with the installation of 8 x 15m floodlights and 3m-5m high perimeter fencing, relocation of existing netball court and extension to car parking area (amended information including amended hours of operation).

RECOMMENDATION:

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

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

   Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

   1980_001 Location Plan
   1980_002 Existing Site Plan
   1980_022 Rev A Proposed Site Plan
   1980_003 Existing Ground Floor Plan
   1980_023 Proposed Ground Floor
   1980_004 Existing First and Floor and Roof Plan
   1980_024 Proposed First Floor and Roof Plan

   1980_041 Proposed All Weather Pitch and New Car park
   5260-E001-P3 All Weather Lighting Arrangement
   5260-E002-P1 All Weather Lighting Arrangement
   LIGHTING MODELLING REV B 25.0.3.2026

   1980_008 Existing Site Section BB and CC
   1980_009 Existing Site Section DD and EE
   1980_028 Proposed Site Section BB and CC

1980_029 Proposed Site Section DD and EE

1980_005 Existing Elevations A and B
1980_006 Existing Elevations C and D
1980_007 Existing Site Elevation and Site Section
1980_025 Proposed Elevations A and B
1980_026 Proposed Elevation C and D
1980_027 Proposed Site Elevation and Site Sections

880/01 Landscape Proposals

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

3. The use of the all weather playing pitch hereby permitted shall not be used other than between the hours of:

8.30am - 8pm Monday to Thursday;
8.30am - 5pm Friday;
9am - 5pm Saturday and Sunday;
and at no times on Bank Holidays or National Holidays.

Reason: To safeguard the residential amenities of neighbouring properties.

4. The floodlighting shall be in operation no longer than ten minutes past the permitted hours of opening.

Reason: To ensure appropriate amenity and reduce lighting impacts.

5. Prior to the commencement of any development above slab level works, a written schedule with details of the source/ manufacturer, colour and finish, OR samples on request of all external facing and roof materials shall be submitted to and approved in writing by the Local Planning Authority. This must include details of reasonable efforts for all external materials to be locally sourced. The development shall be carried out using only those external materials approved.

Reason: To ensure that a satisfactory external appearance of the development is achieved and to ensure the development reduces embodied carbon in line with Local Plan: Development Management Policies (LPDMP) policy D14: Sustainable and Low Impact Development and the Climate Change Sustainable Design, Construction and Energy SPD 2024 paragraphs 5.53-5.63.

6. No demolition/development shall take place/commence until a written programme of archaeological work including a Written Scheme of Investigation has been submitted to and approved in writing by the local planning authority. The scheme shall include an assessment of the significance and research questions; and (if indicated by the Desk Top Study submitted with the application) 1. The programme and methodology of site investigation and recording 2. The programme for post investigation

assessment 3. Provision to be made for analysis of the site investigation and recording 4. Provision to be made for publication and dissemination of the analysis and records of the site investigation 5. Provision to be made for archive deposition of the analysis and records of the site investigation 6. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation

Reason: To allow adequate archaeological investigation before any archaeological remains are disturbed by the approved development.

7. The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the 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. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate equivalent to the pre-development Greenfield run-off including multifunctional sustainable drainage systems.
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.

8. Prior to the first occupation 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.

9. All planting, seeding or turfing approved shall be carried out in the first planting and seeding season following the occupation of the development or the completion of the development, whichever is the sooner. Any trees or plants which, within a period of five years after planting, are removed, die or become seriously damaged or diseased in the opinion of the Local Planning Authority, shall be replaced in the current or next available planting season, whichever is sooner, with another specimen 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. No development above slab level shall take place until a Ecological Enhancement Scheme has been submitted to and agreed in writing by the local planning authority, which shall include the following:

- Details of the location and type of integrated bat and bird boxes
- Details of the location and specification of log piles / insect boxes

The approved scheme shall be implemented in full prior to the first use of the development hereby approved and retained thereafter.

Reason: To increase the biodiversity of the site and mitigate any impact from the development.

11. The approved Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP), prepared by Challice Consulting Ltd., and dated 30 October 2023, must be adhered to in full. No development shall commence until tree protection measures, and any other pre-commencement measures as set out in the AMS and TPP, have been installed/implemented. The protection measures shall be maintained in accordance with the approved details, until all equipment, machinery and surplus materials have been moved from the site.

Reason: To protect the trees on site or adjacent which are to be retained in the interests of the visual amenities of the locality.

12. The delivery of a Biodiversity Net Gain, in accordance with the Biodiversity Net Gain Plan, shall be implemented in the first available planting season, and retained for a minimum of 30 years from the date of completion of the enhancements.

Reason: In order to secure the delivery and retention of Biodiversity Net Gain in accordance with the Biodiversity Net Gain increase.

13. No sound-amplifying equipment, loudspeakers or public address system shall be installed or operated within or immediately adjacent to the pitch.

Reason: To safeguard the adjoining premises and the area generally from noise and disturbance.

14. No sound amplifying equipment, loudspeakers, or public address system shall be installed or operated at any time on the balcony area hereby permitted.

Reason: To safeguard the adjoining premises and the area generally from noise and disturbance.

15. No development including any works of demolition or preparation works prior to building operations shall take place on site until a Construction Traffic and Environmental Management Plan (CTEMP) has been submitted to, and approved in writing by the local planning authority. The approved statement shall be adhered to throughout the construction period and shall include:

(a) Parking for vehicles of site personnel, operatives and visitors
(b) Loading and unloading of plant and materials
(c) Storage of plant and materials used in constructing the development
(d) Wheel washing facilities
(e) Measures to control the emissions of dust and dirt during construction
(f) A scheme for the recycling/disposing of waste and soil resulting from demolition and construction works.
(g) Risk assessment of the potentially damaging construction activities to wildlife
(h) Practical measures to avoid and reduce impacts to wildlife during construction
(i) Location and timing of works to avoid harm to biodiversity features
(j) Responsible persons and lines of communication
(k) Details of protective fencing, exclusion barriers and warning signs.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users, and in the interest of protection and wildlife.

16. The development should be carried out in strict accordance with the submitted scheme and shall not be altered without the prior written approval of the Local Planning Authority. The floodlighting shall be installed, maintained and operated in accordance with the approved details unless the Local Planning Authority gives written consent to the variation.

Reason: To ensure adequate control over the development and ensure appropriate amenity.

17. Before the Artificial Grass Pitch (AGP) is first used, a Management and Maintenance Scheme for the facility including management responsibilities, a maintenance schedule and a mechanism for review shall be submitted to and approved in writing by the Local Planning Authority, in consultation with Sport

England. The Management and Maintenance Scheme should include measures to ensure the replacement of the AGP within a specified period. The measures set out in the approved scheme shall be complied with in full, with effect from commencement of use of the AGP.

Reason: To ensure that a new facility is capable of being managed and maintained to deliver a facility which is fit for purpose, sustainable and to ensure sufficient benefit of the development to sport and to accord with Development Plan Policy.

18. The artificial playing pitch hereby permitted shall not allow:

- Any sheet metal advertising signs
- Any lightweight sub shelters

Reason: To ensure suitable noise mitigation and adequate amenity of residents.

19. Within 30 days prior to the commencement of the development hereby approved, and updated badger walkover survey of the site shall be undertaken. The findings of which will be made available to the Local Planning Authority on request, and if an active badger sett is present a mitigation strategy shall be submitted to and approved in writing by the Local Planning Authority, including where a licence will be required by Natural England. Any approved mitigation strategy will be carried out in accordance with the approved details.

Reason: To conserve and enhance biodiversity in accordance with the development plan and NPPF.

20. Use of the Artificial Grass Pitch (AGP) development shall not commence until a community use agreement has been submitted to and approved in writing by the Local Planning Authority in consultation with Sport England. The agreement shall apply to the AGP development and associated ancillary facilities including details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved community use agreement.

Reason: To secure well managed safe community access to the sports facility, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy.

21. In accordance with the recommendations of the All-Weather Impact Assessment (reference 26001/001revC/pc, By Applied Acoustic Design), the artificial playing pitch hereby permitted shall not be brought into use until:

- Minimum 1.2m high acoustic padding on all internal sides of the fence are installed, and;
- Resilient fixings to weldmesh fence are used.

The above shall be retained thereafter.

Reason: To ensure appropriate noise mitigation and adequate amenity of surrounding dwellings.

22. Prior to first use of the artificial playing pitch herby permitted, a noise management plan (to be substantially in accordance with the draft noise management plan dated 07 May 2026) shall be submitted to and approved in writing by the Local Planning Authority, and shall be implemented before the use is first commenced and shall be maintained thereafter.

Reason: To ensure appropriate noise mitigation for the amenity of residents.

Informatives:

1. **Biodiversity Statutory Gain Plan Condition (The 'BNG Condition')**

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition") that development may not begin unless:

(a) a Biodiversity Gain Plan has been submitted to the Local Planning Authority, and
(b) the planning authority has approved the plan.

Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

2. Guidance on preparing Community Use Agreements is available from Sport England: http://www.sportengland.org/planningapplications/. For artificial grass pitches it is recommended that you seek guidance from the Football Association/England Hockey/Rugby Football Union on pitch construction when determining the community use hours the artificial pitch can accommodate.

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

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

Sub ground structures should be designed so they do not have an adverse effect on groundwater.

If there are any further queries please contact the Flood Risk, Planning, and Consenting Team via SUDS@surreycc.gov.uk. Please use our reference number in any future correspondence.

4. 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 in certain circumstances
- 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 provided which addressed initial issues, the application has been submitted in accordance with that advice, however, further issues were identified during the consultation stage of the application. Officers have worked with the applicant to overcome these issues.

Committee Referral

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

Officer's Report

Site description

The site is a co-educational secondary school which sits within the built-up area of Merrow, in a predominantly residential area. The school is accessed from Horseshoe Lane East, which is located off the A25 Epsom Road.

The site has several mature trees within its grounds. The largest and most prominent are those trees along Horseshoe Lane East, however there are also trees located at the boundary of the southern playing pitches.

The school buildings are located generally to the northeast of the wider school campus. The building subject to the extension, St Cecillia's Theatre, is located further to the eastern boundary, close to the main access off of Horseshoe Lane East. St Cecillia's building was built in 2014 and is white rendered with a simple sheet pitched roof.

School playing fields are located south of the school buildings, which sit generally centrally within the school site. A large playing field is located directly south, with a further rectangular playing field located southeast of the buildings.

To the east of the site, residential development is present, separated by Horseshoe Lane East. On all other sides, residential gardens abut the site boundary, with varying residential garden depths. In most interfaces with residential development, mature tree planting is present.

Along Horseshoe Lane East, the school site has a range of boundary treatments. In the south, where the proposed pitch would be, a green palisade fence is located around the school site with vegetation throughout.

Proposal

The application seeks planning permission for a two storey extension to the existing school building, St Cecilia's, which would provide a new drama studio, PE classroom, changing facilities and a hospitality space designed to accommodate school events. The two storey extension would measure 400sqm internally, with a built footprint of approximately 238sqm (13.12m x 18.56m). The extension includes an external balcony space overlooking the sports fields to the south.

In addition, permission is sought for the construction of an all-weather sports pitch with sand dressed artificial grass surface measuring 106m x 107m, together with the installation of 8 x 15m high floodlights and 3m-5m high perimeter fencing. A 3m high perimeter fencing will enclose the pitch on the east and south boundary, and a 5m high perimeter fence will enclose the north and west sides of the pitch, which face the school and car park.

The application also involves the reconfiguration of car parking areas to compensate for the removal of existing car parking space removed by the extension proposal. As a result, the hardstanding used for netball and overflow parking will be located further south, with additional gravel car parking spaces situated in the area adjacent to Horseshoe Lane East. The reconfiguration would result in the same number of parking spaces (116) as existing.

Amendments

Throughout the application, there has been additional information submitted, and changes to the proposed hours of use have been altered to address various concerns, however, are proposed as the following:

- 8.30am - 8pm Monday to Thursday; (a reduction from a 9pm curfew)
- 8.30am - 5pm Friday;
- 9am - 5pm Saturday and Sunday;
- and at no times on Bank Holidays or National Holidays.

Additional re-consultation with neighbours, a site notice and further re-consultation with relevant consultees has been undertaken.

Relevant planning history

The site has been subject to a number of planning applications since its creation. A full planning history can be found online, however, the most relevant planning history is below:

Reference:	Description:	Decision Summary:	Appeal:
22/P/01177	Permanent retention of existing single storey modular building for use F2(b).	Approved 19/01/2023	N/A
20/P/01681	Proposed two new single storey 6th form teaching buildings with covered area between the blocks.	Approved 17/08/2021	N/A

17/P/01802	Consultation by Surrey County Council regarding details of a School Travel Plan submitted pursuant to Condition 12 of planning permission ref: GU/17/P/00129 dated 10/05/17.	No Objection 20/09/2017	N/A
17/P/01000	Retention of existing single storey modular building for use by ArtVenture Trust Ltd	Approved 30/06/2017	N/A
17/P/00129	Consultation from Surrey County Council for the erection of a two storey building to provide 8 x general teaching rooms, 3 x art class rooms, a chapel and other associated facilities, refurbishment of parts of the existing music and science blocks, creation of new tennis court / coach parking and hard play area, creation of 17 additional car parking spaces and 20 additional cycle parking spaces, landscaping and other associated works	No Objection 20/02/2017	N/A

Consultations

Statutory consultees

Surrey County Council Highway Authority: No objection. The applicants resolved the query regarding parking space locations with regards to fire access, and therefore this comment is closed. Requested off site financial contributions to 1) provide for a Real Time Passenger Information display at the High Path Road Bus Stop (Merrow Boundary) located along Epsom Road, and 2) Copenhagen crossings at Horseshoe Lane East and Epsom Road junction, and across Merrow Cross. [Officer Note: The financial contributions will be discussed within the report.]

Surrey County Council SuDs Team: No objection subject to planning conditions to secure a detailed surface water drainage scheme. Original objections adequately addressed and now the proposed drainage strategy accord with the National Standards.

Thames Water: No objection to the proposal in relation to capacity within the Wast Water Networks, Sewage Treatment Works. No objection to Surface Water Drainage provided the applicant follows the sequential approach to disposal and recommends petrol / oil receptors be fitted for the car parking areas.

Sport England: Objection resolved. Concerns were raised regarding the useability of the proposed Artificial Pitch for football users, and that some clubs may have been under the impressions that the pitch was to be a 3G rubber crumb surface. [07.12.2025] After further clarification and support was received from local football clubs, stating that whilst the sand dressed surface would not be suitable for competitions it would serve a purpose for training, no objection is raised subject to securing a Community Use Agreement and a Management and Maintenance Scheme via planning condition.

Other consultees

Environmental Health: Objection resolved.

[13.08.2025] - Advised that the Noise Assessment submitted was insufficient. The Assessment compared the predicted noise levels against current playing pitch use, however in reality the pitches were currently unable to be used during winter months or weekends due to drainage issues and lack of lighting. The applicant needed to undertake a new assessment and compare predicted noise levels with a 'worst case scenario' i.e. background level of no sports being played. In addition, noise impact of hockey balls needed to be incorporated into the assessment. If additional mitigation is required, such as an acoustic fence, this should be provided.

With regards to the proposed lighting, no objections are raised subject to a suitable condition restricting alterations unless approved in writing by the local planning authority.

[07.07.2026] - Following amendments to the application, including updated hours of use, and the revised Noise Assessment (26001/001recC/pc dated 7th May 2026, by Applied Acoustic Design), no objection is raised subject to imposing an appropriate condition requiring the recommendations within the Noise Impact Assessment and draft Noise Management Plan to be implemented. Whilst 10 properties exceed the Sport England criteria of 50 dB LAeq, with the highest being 53 dB LAeq at just three properties, no properties would exceed the World Health Organization (WHO) recommended 55dB LAeq in outdoor areas to protect people from serious annoyance. Coupled with the change of hours and the mitigation measures specified, the residual impacts would not warrant an objection on noise grounds.

Tree Officer: No objection raised on arboricultural grounds. Recommends a condition requiring the works to be carried out in accordance with the submitted arboricultural method statement and tree protection plan.

County Archaeology: No objection subject to conditions. The desk based archaeological assessment produced concludes that the proposal will not impact upon any known heritage assets, but that the area is considered to have moderate to high potential for prehistoric archaeology. Therefore, no objection is raised but a condition is requested to provide trial trenches for both the extension and the all-weather pitch area.

Surrey Wildlife Trust: Objection resolved.

[19.07.2024] - The Preliminary Ecological Appraisal (John Wenman Ecological Consultancy, 2024) recommended bat activity surveys to be carried out. Therefore, without the completed survey, the impact assessment is incomplete and advised that the LPA do not have sufficient information to determine the application. Recommended a bat preliminary ground tree level roost assessment, for the loss of the sycamore tree. Various clarifications were requested, including the methodologies used on how the determination of badger presence was undertaken, and also clarity on the ruling out of a local waterbody 340m east of the application for amphibians. SWT also requested a net biodiversity gain of 20% in line with policy.

[06.03.2026] - Raised concerns with the Preliminary Ecological Appraisal (John Wenman Ecological Consultancy, 2025) that the ecological assessment for bats is currently insufficient, particularly regarding the impacts of floodlighting on important bat commuting, foraging and potentially roosting habitats, and recommends further survey work, assessment and mitigation.

Clarification was sought from the applicant with regards to the methodology within the Preliminary Ecological Appraisal, with regards to reptiles and amphibians, and the response is satisfactory subject to conditions requiring best practice precautionary measures. The badger assessments are satisfactory, however the West Surrey Badger Group appear to have identified a location of a sett on site. This is required to be re-assessed prior to determination.

[09.07.2026] - Following additional information and changes to the application in relation hours of use, no objections are raised. No lighting will be in use during the approximate emergence period for the more light sensitive bat species, or at any time during Friday-Sunday owing the 5pm curfew. There would be some overlap between the use of lighting and the more tolerant species in April and September, however, the reduced lux levels on the boundaries which significantly reduces the impacts to these species. The risks to roosting bats is low. In considering the conservation status of bat species affected and the importance of the site at a local and national level, Surrey Wildlife Trust advise that no objections are raised and should planning permission be granted, then a final and detailed lighting management plan should be secured.

In relation to badgers, the Supplementary Ecological Surveys (March 2026) noted that an updated walkover survey suggests no evidence of badgers. Therefore, subject to precautionary measures secured by condition, and a Sensitive Lighting Management Plan, this is found to be acceptable.

The application would deliver 10% BNG, however, GBC policy requires 20% which needs to be considered by the LPA [Officer Note: The NPPF 2026 has updated GBC policy which now means that only 10% statutory minimum required]

Recommend a condition securing a Construction Environmental Management Plan (CEMP) to be submitted prior to commencement and an on-site Ecological Enhancement Plan should also be secured by way of condition.

<u>Amenity Groups / Residents associations:</u>

West Surrey Badger Group: Objection. Claims that there is a four hole active main badger sett, and the ecology report does not take account of this. The lighting will detrimentally impact badgers, and suggests a restriction on hours of use after 8pm. [Officer note: Note that the application has changed the hours of use, along with an updated Ecology Report which confirms no badger activity.]

Merrow Residents Association: Objection. Merrow Residents Association instructed an independent noise assessment from Cass Allen (dated 11th July 2024), which reviewed the applicants original noise assessment by Applied Acoustic Design 23190/001/os dated 30th October 2023 and raised the following points:

- The applicant noise assessment did not assess the sports pitch as a new noise source, which was erroneous as the current fields are not in use beyond 3pm during term time. It is therefore requested the assessment of noise against the current and real-world ambient noise levels in the evening to give a better understanding of the impact on neighbouring properties.
- Inconsistencies with the sound modelling resulting in the categorisation of sound level changes being under estimated.
- Further mitigation such as sound absorbing material at hockey goals, permanent fencing should be considered along with a Noise Management Plan.
- Mitigation measures were noted within the Planning Statement (fencing, anti-vibration mounts,

shock absorbing carped wrapped kick board) which were supported, but it was not clear whether these were taken into account as part of the applicants noise assessment
- Comments were made supporting the principle of a Community Use Agreement which would be able to terminate contracts is users were anti-social, but could not see any information on an evening curfew.
- They were not aware of any curfews being suggested by the school, potentially allowing letting's every evening and weekend.

A further review from Cass Allen (3rd August 2026) was instructed following the applicants updated Noise Assessment (26001/001recC/pc dated 7th May 2026, by Applied Acoustic Design). The review raised the following points:

- Further testing is requested (attended measurements) to reinforce the validity of the unattended measurements
- The applicants noise assessment is incorrect as it only assesses football use and does not assess hockey, which is likely to generate higher and more intrusive noise levels owing to the impulsive noises generated by this sport. Also suggests that a research paper from Apex Acoustics Ltd looking at maximum noise levels from hockey matches which should be incorporated.
- Support padding, however this should be extended to all areas of fencing and not solely to goal boards.
- Concerns are raised that acoustic barriers, a recognised mitigation measure capable of reducing noise by 5-10dB, have not been incorporated into the scheme. Suggest the inclusion of a transparent noise barrier.
- Would like to see further restrictions considered so that only training can be held on the MUGA pitch
- The noise management plan should consider which hours would be available for each sport

Third party comments:

Publicity of the application was undertaken in accordance with Article 15 of the Development Management Procedure Order. Following amendments further publicity was undertaken in accordance with the DMPO.

84 no. letters of objection have been received raising the following concerns:

- Hours of use are too long
- Noise impacts - One representation included a MACH Acoustics report which disputes the methodology used for a 1 hour noise assessment period, as the WHO advises that the assessment should be for a 16 hour daytime period. In addition, the representation suggests that there is debate on whether the Sport England guidance is appropriate and that the guidance does not represent the specific site characteristics, intensity and duration of noise because it looked at football rugby hockey, ranging from 12 to 50 players on the pitch.
- Lighting impacts
- Size, scale and lighting of the pitch is akin to a commercial size and is not appropriate for the size and scale of the school
- Impacts to ecology and wildlife - bats, badgers, foxes, mice, birds
- Lack of assessment of floodlighting on bats - nearby MUGA application 19/P/01734 included a bat survey
- Visual intrusion
- Traffic impacts

98 no. letters of support have been received outlining the following positive comments:

- The beneficial impacts on students, local clubs, families and community in relation to access of the facility
- The facility will bring it in line with other schools which have better facilities
- Physical health, mental health and social development benefits
- Increased participation of sport year round by students and external users
- Reduction in cancellations of training and matches due to poor pitch condition and lighting
- The pitch allows multiple sports to be players, increasing expansion of all sports
- Increased participation in sports for young people
- Opportunities for local sports clubs to expand their capacity and offerings

Planning policies

National Planning Policy Framework (NPPF) 2026:

Chapter 3 - Decision-making policies
Chapter 4 - Achieving sustainable development
Chapter 14 - Achieving well-designed places
Chapter 16 - Promoting healthy communities
Chapter 17 - Pollution, public protection and security
Chapter 18 - Managing Flood Risk
Chapter 19 - Conserving and enhancing the natural environment
Chapter 20 - Conserving and enhancing the historic environment

Guildford Borough Local Plan: Development Management Policies

Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Policy D5: Protection of Amenity and Provision of Amenity Space
Policy P7: Biodiversity in New Developments
Policy D11: Noise Impacts
Policy D12: Light Impacts and Dark Skies
Policy ID6: Open Space in New Developments
Policy ID7: Community Facilities
Policy ID10: Parking Standards for New Development

Guildford Local Plan: Strategy and Sites 2015-2034 (2019):

Policy S1: Presumption in favour of sustainable development
Policy S2: Planning for the borough - our spatial strategy
Policy P4: Flooding, flood risk and groundwater protection zones
Policy D1: Place shaping
Policy D3: Historic Environment
Policy ID4: Green and blue Infrastructure
Policy ID3: Sustainable transport for new developments

Supplementary Planning Documents (SPD's):

GBC Parking Standards for New Development SPD (2023)

Planning considerations

The main planning considerations in this case are:

- Principle of development
- Loss of open space
- Impact on character and appearance
- Lighting impacts
- Noise Impacts
- BNG
- Ecology
- Planning balance
- Equality, diversity, and human rights

Principle of development

Policy S3 and S4 of the NPPF sets out a presumption in favour of sustainable development and requires that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects. The site is located within the identified settlement and urban area of Guildford and therefore the principle of an extension and a sports pitch is acceptable, although is subject to an assessment of the application against the development plan as a whole.

Loss of a Sports Pitch

Policy HC7 of the NPPF states that proposals should not result in the loss of existing open space, recreational land, including playing fields unless the development is for alternative open space, where the benefits clearly outweigh the loss of the current or former use. Policy ID4 of the LPSS clarifies that all areas identified as open space on the Policies Map will be protected from development in accordance with the NPPF.

The site is identified as Open Space on the policies map, and is therefore protected from development which would result in the loss of open space. The proposal would result in the loss of a natural grassed pitch, and would be replaced with an all-weather sports pitch with sand dressed artificial grass surface measuring 106m x 107m. The applicant has advised that the current pitch becomes regularly waterlogged and unusable due to the current demand of the natural pitch from PE classes and letting's at the weekend. The pitch is also not available to after school clubs for half of the year (between October and February), owing to unsuitable grounds and available light, severely restricting availability for sports use.

Involvement in sport has significant physical benefits as well as important mental health benefits such as improving behaviour, building characteristics such as resilience and values including fair play, tackling loneliness, and improving self-esteem. The benefits of sport, in particular for young people, are supported by The Department for Education's '*School Sport Activity Plan*' (July 2019), and *Sport England's Guidance 'Planning for Sport*'. An Artificial Grass Pitch instead of a grass pitch would allow for a much higher intensity of use for sport, by both the school and the wider community. In addition, the inclusion of lighting would allow for playing time to be extended by around 40% (Sport England, Artificial Sports Lighting Guidance 2012).

Sport England originally objected (29th July 2024) to the proposals on the basis that the proposed pitch type, a sand dressed artificial grass surface, would prejudice the use of the pitches for football.

However, further clarification provided by the applicant set out that the existing football users were hiring out a separate pitch on the site and would be able to continue doing so. The *Sport England: Artificial Surfaces for Outdoor Sport Guidance Note* suggests that whilst a sand dressed surface is more specialised and suited for hockey, general modified games / training for football, rugby, athletics, netball, basketball and tennis are also possible. In addition, football groups, Albury Football Club and Guildford Saints confirmed that whilst the sand dressed surface would be optimised for hockey, and it was unlikely they would rent the pitch for matches, there is demand for all weather floodlit surfacing for general training during the week. In addition, this surface would be able to be used for various PE classes associated with the school. Sport England subsequently removed their objection.

Policy ID6 of the LPDMP requires that artificial pitches are required to demonstrate by means of a Community Use Agreement that any privately owned pitch will be accessible to the public and the charges are affordable. The applicant has confirmed that the pitch would be rented out to community groups, and therefore a planning condition requiring the submission and approval of a Community Use Agreement would be imposed.

Therefore, the loss of a natural grassed pitch to an artificial sand surfaced pitch has been demonstrated to provide an equivalent or better provision in terms of quality and therefore is acceptable.

Impact on Character and Appearance

Policy DP3 of the NPPF requires development to respond to their context so that they integrate with their surroundings to create well designed places.

LPSS Policy D1 states that all new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set. Designs should respond and reinforce locally distinct patterns of development, and seek to promote healthy living by providing easy navigation, natural security and open space. Policy D4 of the LPDMP emphasises the need to meet the ten characteristics of good design as set out in the National Design Guide, which include context, identity, movement, nature and public space.

Proposed Sports Pitch and Lighting

The pitch would measure 106m x 70m, and replaces an existing natural grassed playing pitch. Concerns have been raised by neighbours that the size of the pitch is too large and out of scale for a school site of this size. However, the sports pitch would not take up the entirety of the playing fields to the south and the size of the pitch would be appropriate to cater for school PE classes, adult community use and matches. The size would not be of a scale which would be inappropriate or incongruent, and would not cause material harm to the character or appearance of the wider area. In addition, the presence of a sports pitch in this location would read as part of use of the site as a school and would not be inappropriate in terms of its character.

A 3m high perimeter fencing would enclose the pitch on the east and south boundary, and a 5m high perimeter fence will enclose the north and west sides of the pitch, which face the school and the car park. The fencing would be weldmesh, which would provide a level of transparency to the feature. The fencing would not protrude above the ridgeline of the closest school buildings, and would be seen in the context of the school's facilities.

8 no. floodlights are proposed around the boundary of the sports pitch, mounted on a 15m tall pole.

The floodlights themselves would measure approximately 0.84m x 0.69m, with a depth of 0.15m. Whilst the height of the floodlights would result in some visual presence in wider views, the infrastructure would not be unduly bulky to the point it would cause significant visual adverse impacts. The columns would be more appreciable when turned on, particularly for closer neighbours in the context of dark evenings where the contrast of lighting will be more evident. However, the limited hours of use and proposed landscape screening would not result in an unacceptable level of visual intrusion.

Overall, the proposed infrastructure would be seen within the context of an urban environment. Therefore, the proposed development would not be unacceptably harmful to the character and appearance of the area and accord with Policy D1 of the LPSS, D4 of the LPDMP, National Design Guide and the NPPF.

Proposed Extension

The proposed extension would be located at the western end of St Cecilia block. The extension would continue to follow the existing blocks roof profile, and pitch, whilst comprising two ridge lines which would step up in height. The first ridge line would be approximately 2m higher than the existing building, whilst the projecting roof line forming the drama studio would be an additional 0.8m taller. The proposal would be suitable in scale owing to the use of the school and its appearance as a more functional and civic building. Given the distance from neighbouring residents, and the nature of the use of the building, there would be no impacts of overbearing, shadowing, loss of light or privacy.

The extension would feature white render, which would continue the material palette of the existing building, whilst the projected part of the building would feature stepped brickwork to provide a contemporary fenestration. The materials are considered to be complementary to the building and together with the changes in ridge line, act as a delineation for the building.

The windows are proposed in bronze powder coated aluminium to emphasize the contemporary character. A balcony area proposed to the south, would be finished in bronze powder coated aluminium to match the windows.

The proposed design would therefore be appropriate in its setting and would not harm the character and appearance of the area. The proposal would therefore accord with Policy D1 of the LPSS, D4 of the LPDMP, National Design Guide and NPPF.

Lighting Impacts

Policy D5 of the LPDMP requires development proposals to avoid having an unacceptable impact on the living environment of the existing residential properties, in particular in regard to artificial lighting, noise and vibration. Policy D12 of the LPDMP requires the minimisation of light pollution, and supports the consideration of impacts on sensitive receptors, including wildlife. Policy P3 of the NPPF requires development to be appropriate to its location regarding the effects of pollution on health, living conditions, amenity and the natural environment. Adverse impacts from artificial lighting or other sources of pollution are required to be avoided where possible, or mitigated to an acceptable degree.

The site is located within the wider suburban area of Guildford, which is generally lit with streetlights, ambient lighting from dwellings and development and car traffic. There is no dark night skies designation in this location.

8 No. floodlighting columns, each of which comprises 3 No. floodlights are proposed on the boundary of the proposed pitch. The lighting columns would measure 15m, designed with two different types of floodlights, providing luminaires with both narrow distribution and wide distribution, and different orientations and angles to concentrate lighting on the pitch. The applicants have confirmed that the proposed lighting design has been modelled to achieve 350 lux 0.7 uniformity for Class II (Club Level) Hockey based on the International Hockey Federation (FIH) standards for pitch floodlighting. This lux level would also allow for football, tennis, and rugby training. As secured by condition four, the floodlighting shall be in operation no longer than ten minutes past the permitted hours of opening, and will generally only be required during darker months.

Lightspill - the spilling of light beyond the boundary of the area proposed to be lit.

The floodlights are intended to illuminate the hockey pitch only and are designed, orientated and angled to direct light towards this area. Mounting the floodlights on taller columns allow light to be concentrated within the pitch with minimal horizontal light spillage. Additionally, the floodlights would also be fitted with spill shields to mitigate light spill in the direction of neighbouring properties.

Upward Light - Upward lighting from individual luminaires causes sky glow, which is a brightening of the sky.

The PPG states that lighting near or above the horizontal plane should be avoided to reduce glare and sky glow (the brightening of the night sky). Several luminaires are proposed to be positioned with an angle which goes above the horizontal line in order to achieve the necessary lux levels and uniformity levels across the pitch. However, the applicant has confirmed that those which are angled up would be fitted with hoods which would restrict the upward lighting above the horizontal plane.

Amenity

The site is surrounded by residential properties, the closest being 16m south of the proposed pitch (83 Horseshoe Lane East), and the row of houses to the west of Horseshoe Lane East, which would be approximately 53m from the proposed all-weather pitch.

Consultees requested further details on the current lit environment, however the applicant's lighting designer confirmed that this would not be possible owing to the variables not in their control (houses, garden lighting, school lighting, street lighting). Therefore, modelling has been carried out solely utilising the existing street lighting and bollard/column lighting within the school car park. The baseline levels at the southern boundary of the site are an average of 0.03 lux, and a max lux level of 0.18 lux.

For context, the below presents a general guide for suitable lux levels in different environments:
- Supermarket = 750 lux
- Office space = 300-500 lux
- Hallway = 55-75 lux

A Floodlighting Technical Note (and floodlight modelling from Kingfisher Lighting, received 25th March 2026) was submitted during the determination of the application, which set out that owing to new lighting technology since the application was submitted, lightspill would be greatly reduced to neighbouring properties. As a result, the accompanying modelling demonstrates that only one dwelling (83 Horseshoe Lane East) would experience lighting levels of 10 lux in the closest corner of their private rear garden, reducing to 2 lux into the remaining area of the garden. However, this

is also helped by existing intervening vegetation and close boarded fencing which is not part of the modelling, and so the actual impact would be lessened. The remainder of the surrounding properties would be subject to 0-2 lux of light as a result of the floodlights.

The floodlights would be controlled by a control kiosk which would allow users to select the most appropriate lighting output for the sport being played. The controls would allow dimming of the floodlights further than the modelling shown, allowing control of the light output dependent on the type of sport and level of play required (competitions vs general training). In some cases, a lower lighting level would be achieved dependent on the needs required.

Additional planting is also proposed at the exit of the overflow car parking area which, when mature, would help reduce the visibility of the lit pitch from properties along Horseshoe Lane. Additionally, further planting is proposed along the shared boundary with 87 Horseshoe Lane East, 2 and 3 Merrow Croft.

The Environmental Health Officer has reviewed the submission and amended details and confirmed that the floodlights would meet guidelines set out in the Institute of Lighting Professionals Guidance for the Reduction of Obtrusive Lighting, in terms of vertical illuminance, luminous intensity, Skyglow and Upward flux ratio and has raised no objection. They have proposed a condition which requires the development to be built in accordance with the approved details, including the provision of the proposed spill shields, orientation and lux levels of the floodlights, along with a restriction on lighting hours in conjunction with the hours of use of the pitch (as per condition four).

Although significant lighting impacts have been avoided, it is acknowledged that there would be an increase in lighting in some outdoor amenity spaces, which would amount to harm, in conflict with Policy P3 of the NPPF, and Policy D5 and D12 of the LPDMP. Therefore, this harm is weighed in the planning balance below.

Noise Impacts

Policy P3 of the NPPF seeks to ensure that development is appropriate for its location, and avoid exposure to levels of noise which could have unacceptable adverse effects on health and quality of life. Adverse impacts from noise pollution are required to be mitigated and reduced to a minimum, and must not result in levels of noise exposure which would have a Significant Observed Adverse Effect. The NPPG provides guidance on the interpretation of NPPF policy and definitions of Observed Adverse Effects.

Policy D11 of the LPDMP requires noise generating development to identify likely adverse noise impacts, and are required to demonstrate how the proposed development proposal will be designed and implemented in order to:

a) prevent any present and very disruptive Significant Observed Adverse Effect levels,
b) avoid any present and disruptive Significant Observed Adverse Effect levels; and
c) mitigate any present and intrusive Lowest Observed Adverse Effect levels.

The existing playing fields to the south of the school is a mown grass area. The current arrangement of the pitch as seen as part of the officer site visit was two north-south oriented football pitches, and a further pitch within the semi enclosed field in the south eastern corner. It is acknowledged that amendments to the formation or location of playing pitches on the grass playing fields is allowed to be undertaken without any need for planning permission. The hours and days of use of the school playing fields is entirely unrestricted in planning terms. Therefore, fetes, evening and weekend

activities are able to be carried out without the need for planning permission. The application confirms that the current operation of the school and its grounds is 7am - 11pm on weekdays and 9am-5pm on weekends.

While unrestricted in planning terms, the existing grass pitches are constrained by weather conditions, as the school report waterlogging through periods of rainfall and activity on the pitch. In addition, there is an absence of lighting which limits any activity in the evenings during winter months. Therefore, the current use is likely limited to school students during the day in drier term time months, and weekend activity through the current letting of pitches to community groups and events.

The proposed development would increase the useability of the pitch, particularly during evenings, and would therefore result in a more intensive level of activity than currently experienced. The Environmental Health (EH) Officer initially raised concerns with the Noise Assessment undertaken which failed to assess and compare the existing ambient noise in the evening which did not have sports use on the fields.

In response, a further Noise Assessment (*Ref: 26001/001REVC/PC, dated 7 May 2026*), modelling impacts on 173 nearby dwellings, was submitted by the applicant. In addition to the updated modelling, the proposed hours of use were also amended as part of the re-submitted application and would be restricted to:

- Monday to Thursday 8pm curfew
- Fridays, Saturdays and Sundays 5pm curfew

The Noise Assessment (May 2026) applied the methodology from *Sport England Artificial Grass Pitch Acoustics Planning Implications (2015)* which uses a representative noise source level of 58db. Sport England state that the figure is derived from noise levels measured from different sports, including hockey, and by men, women and children. The guidance recognises that "*The most significant noise levels were found to be generally derived from the voices of players, with the exception of hockey where impacts noises of balls hitting perimeter strike boards and goal back boards were more noticeable. Such impact noises can be mitigated by incorporating shock absorbing noise reduction measures. Assuming such mitigation measures, the most significant noise source from the typical AGP sports sessions is therefore voice.*"

The Environmental Health Officer has reviewed the amended Noise Assessment (*Ref: 26001/001REVC/PC, dated 7 May 2026*) and advises that the amendments have resulted in a significant reduction in predicted noise impacts. In particular, the number of properties predicted to experience a very substantial increase in noise levels (greater than 10dB) has reduced from four dwellings to none, while the number predicted to experience a substantial increase (greater than 5dB) has reduced from twenty dwellings to five.

The assessment demonstrates that the Sport England guidance criterion of 50 dB LAeq is predicted to be exceeded at 10 properties, with the highest predicted level being 53 dB LAeq at three properties. However, no properties are predicted to exceed the World Health Organization (WHO) outdoor sound criteria of 55 dB LAeq, which protects the majority of people from serious annoyance during the daytime. Accordingly, while a limited number of residents may experience noise levels associated with moderate annoyance (maximum 53 dB LAq), no properties are predicted to experience levels associated with serious annoyance.

The EHO concludes that, notwithstanding five properties that are still predicted to experience a

substantial change in noise levels during the 18:00–20:00 period, the combination of reduced operating hours, the submission of a Noise Management Plan and the implementation of additional mitigation measures recommended by Sport England renders the residual noise effects acceptable. The updated proposal significantly reduces both the extent and magnitude of impacts and removes the previously identified very substantial increases in noise levels. As such, the EHO raises no objection subject to conditions securing the mitigation and management measures.

A range of additional mitigation measures are proposed as follows and can be suitably secured by planning condition:

- Restrict the use of loudspeakers and music in the evenings to prevent unnecessary additional noise which could become a nuisance.
- Provide resilient fixings to weldmesh fence to reduce rattling noise
- No sheet metal advertising signs
- No lightweight sub shelters
- Entrance located away from residential properties
- Lettings would be only to authorised groups only, with a management plan to ensure users are considerate
- Additional 1.2m high padding on all fencing to reduce and change character of sound from balls hitting fencing

It is noted that the Merrow Residents Association instructed an independent noise review (By Cass Allen (3rd August 2026)) of the applicants updated Noise Assessment (26001/001recC/pc dated 7th May 2026, by Applied Acoustic Design). The review raised various points regarding the methodology of the noise assessments undertaken, however, the applicant has confirmed that the existing noise levels utilised both attended and unattended noise surveys, and the proposed noise modelling utilised Sport England guidance on artificial pitches, which is a recognised and acceptable standard for assessing noise from artificial pitches. The applicants have also confirmed that it would not be possible to know which sports would be used by which community users until planning permission was granted and construction was started, as suggested by the independent noise review.

The applicant also considered the provision of acoustic fencing or barrier, as per the request from the Cass Allen review. However, due to the height and visual enclosure required, it was concluded that such a solution would appear unduly dominant within the setting and could create safeguarding concerns by obscuring visibility and supervision. Whilst representations have suggested transparent acoustic barriers, these would still require substantial supporting structures and would accordingly introduce additional visual amenity impacts.

In addition, the applicant had advised that a restriction on whistle use would be included within the list of mitigation measures, however, this would negate the effectiveness of the pitch for sport and is therefore not required.

It is also noted that the pitch would be able to accommodate a variety of sports and activities, rather than exclusively hockey use. Consequently, the frequency and nature of hockey-related impact noise is likely to be lower than assumed within the assessment.

Netball Court

The existing netball court is to be relocated south towards 83 Horseshoe Lane East. However, the netball court would not have lighting, and would also serve as overspill parking provision, therefore

its primary usage would remain throughout the school day and in term time. Therefore, whilst closer to some residents, it would not significantly alter the noise impacts from the netball use and would not result in a significant or unacceptable adverse noise impact on the nearby dwellings.

Balcony

Representations have raised concern regarding the proposed balcony and event space located on the southern elevation of the proposed extension. The balcony area is not unduly large and the nature of the use of the school would mean that this would likely be limited to school functions and occasional sporting competitions. There is no suggestion that this would be for loud uncontained public events which would cause a noise disturbance. In addition, the balcony would be located approximately 60m from the closest residential property. A planning condition to impose restrictions on outdoor music and loudspeakers, would also be included to ensure appropriate noise levels.

Traffic and Associated Parking Noise

The extended hours of pitch availability would result in additional vehicle movements and parking activity in the evenings where background levels are generally quieter. However, the school already accommodates a range of evening activities, including events and community uses, and associated vehicle movements are therefore an established feature of the site. Whilst this would likely marginally increase this activity, there would be no material harm identified in respect of noise from parking and traffic as a result of this application.

Whilst users of the AGP may generate additional noise associated with vehicle doors closing, arrivals and departures, and conversations within the car park, these activities are not considered materially different in character from existing lawful activities at the school, or in the wider area. The level of activity generated would not be sufficient to result in unacceptable noise impacts on neighbouring occupiers.

Conclusion on noise

Whilst the level of noise from the proposed paying pitch has been substantially decreased, and to a level where there is no objection from the EHO officer, it is acknowledged that some residual harm would be experienced by immediate neighbours, by the level of change in the noise environment experienced by dwellings. Whilst mitigation such as the change in use of hours has reduced this harm, the proposal would not strictly comply with policy D11 of the LPDMP. Therefore, there would be a conflict with the development plan, and the harm is assessed in the planning balance below.

Biodiversity Net Gain

Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021), places a mandatory requirement on major development to provide 10% biodiversity net gain. Policy P7 of the LPDMP requires development to secure a measurable net gain of 20%. However, policy N2 of the NPPF which was published in August 2026, confirms that decision makers should not give weight to other development plan policies which require biodiversity gains which require which go beyond the statutory framework. Therefore, the Local Planning Authority will only require 10% statutory minimum BNG.

A Biodiversity Net Gain Assessment has been carried out by the applicant which suggests a 10.31% net gain can be secured on-site as part of this development through the delivery of additional trees,

and improved grassland areas. The statutory BNG requirement would therefore be met and this could be secured by condition for the required 30 years.

Therefore, the delivery of a minimum of 10% BNG would accord wholly with the Policy N2 of NPPF and is acceptable.

Ecology

Policy N2 of the NPPF requires all development to contribute positively to the natural environment and minimise adverse impacts on biodiversity. Planning permission should be refused if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for. Policy P3 of the NPPF also requires development to limit adverse impacts from artificial lighting on nature. Policy N2 also required the inclusion of integrated nest boxes which support priority or threatened species, such as swifts, bats and hedgehogs.

Natural England's Standing Advice is also a material consideration in the consideration of the application. LPDMP Policy P6 reiterates this and requires development proposals to protect and enhance priority species and habitats.

Badgers

West Surrey Badger Group raised objections to the application citing the presence of badgers and the impacts from the lighting of the development. However, the Supplementary Ecological Surveys: Ground Level Tree Assessment & Badger Walkover Survey (By John Wenman Ecological Consultancy, R2544_SES_a, dated March 2026) included a site walkover (undertaken on 23rd March 2026) which found no evidence of the presence of badgers on site. The Surrey Wildlife Trust advised that this was acceptable, however subject to badgers being highly mobile and potentially being present in the wider area, a planning condition should be imposed to secure appropriate precautionary measures.

Bats

The application was supported by a Preliminary Ecological Assessment (February 2024) and supplemented with a further appended letter from the ecological consultant (uploaded 21st February 2025) and Bat Activity Survey (February 2025). The site is assessed to be of local importance to bats within the built-up urban area of Guildford, but not of value at a higher scale i.e. district, county, regional or national level. The survey confirmed the presence of at least 7 different species of bats on site, including more light sensitive species such as brown long eared, *Myotis* spp. and Barbastelle.

The original scheme incorporated mitigation measures, including the positioning of the pitch and floodlighting away from the southern tree-lined boundary, and light spill shields for the floodlights. However, Surrey Wildlife Trust raised concerns over the impact of lighting during key bat emergence times, and the illumination levels on the southern tree line habitat which were thought to host bat roosts. Further information was requested in order to establish the presence of bat roosts and how this would impact emergence periods.

In response, the applicant submitted a further Ecology Report (Supplementary Ecological Survey, By John Wenman Ecological Consultancy, dated March 2026), together with the results of a ground-level tree inspection which confirmed the presence of bat roosts. The supplementary assessment also considered the amendments to the scheme, including the reduced operational

hours and the revised lighting specifications owing to the updated lighting technology. The Ecology Report concluded that the risk of adverse impacts to bats on emerging, commuting, foraging would be substantially reduced during the majority of the active bat season.

SWT advises that the revised lighting curfew would avoid floodlight operation during the emergence periods of light-sensitive bat species in the summer months. In addition, improvements in lighting technology would reduce illumination on the southern boundary tree line from a maximum of 5.97 lux under the original proposal to 3 lux under the revised Class II hockey lighting specification. Surrey Wildlife Trust considered that the amended lighting curfew and reduced light spill represent a significant improvement, ensuring that impacts are largely avoided. Whilst some limited overlap may remain for more light intolerant species in April and September, Surrey Wildlife Trust conclude that the residual effects would not result in significant harm.

Furthermore, an Ecological Improvement Plan, which would be able to secure bat boxes affixed to the existing or proposed school building, and insect boxes, would be conditioned to support the general habitat value of the site for foraging bats.

Trees

The NPPF advises that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Additionally, it advises that opportunities should be taken to retain existing trees wherever possible.

Policy P7 of the LPDMP requires retention of good quality trees and incorporated into development proposals from the outset. The site is not subject to any Tree Preservation Orders, or Conservation Areas which would typically restrict works to trees.

The proposed scheme provides for the retention and protection of all the trees surveyed with the exception of tree group G5 which is required to be removed to accommodate the new parking layout. G5 is a multi stemmed sycamore, categorised as a C grade tree and located to the west of the site. The Council's Tree Officer has not raised any objections on arboricultural grounds.

Its loss would not result in the removal of the verdant streetscene along Horseshoe Lane East owing to the existing retained trees adjacent to the road. In addition, 55 no. trees are proposed to be planted within the site as part of contributions for landscaping, BNG and amenity, and therefore it is considered that the arboricultural impact of losing this tree is sufficiently mitigated.

Therefore, the loss of an existing tree would be acceptable and would accord with Policy P7 of the LPDMP, the NPPF, and the National Design Code.

Highways and Parking

Policy TR6 of the NPPF states that proposals would be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts) or an unacceptable impact on highway safety. Policy ID3 of the LPSS also seeks to maintain the safe operation of the Local Highway Network.

Access and capacity

No changes are proposed to the access to the site, and the existing entrance and exit system from Horseshoe Lane East will continue to be utilised. With regard to trip generation, during the school

day this will largely be unchanged, however the proposal will result in an increase in use for after school clubs, and community groups. Evening and weekends will be used by the community when the school is closed, and the proposal would generate less than one vehicle movement approximately every two minutes. The County Council Highways Authority have raised no objections to the safety or capacity of the road network as a result of the proposed development.

Infrastructure and Legal Agreements

The Highways Authority have requested financial contributions towards off-site infrastructure for the Merrow-bound 'High Path Road' bus stop to provide Real Time Passenger Information (RTPI) displays and various Copenhagen crossings in the area in order to promote sustainable movements.

The three tests as set out in Regulation 122 and 123 of the Community Infrastructure Levy Regulations 2010 (as amended) require Section 106 legal 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.

Further clarification with the Highways Authority confirmed that the requirement for Copenhagen crossings and RTPI bus displays would not warrant an objection if they were not secured, but instead would encourage them.

Whilst Policy ID3 of the LPSS requires development to maximise the provision of high quality safe and direct walking and cycling routes, the application relates to an existing school which facilitates a large number of movements in the school day and generally functions safely. The proposal would not likely increase trip generation during the school day, and would only generate a very small uplift in pedestrian movements after school hours. The mitigation measures to encourage sustainable transports are considered to be disproportionate to the scheme, given that the implementation of a facility is already in a sustainable location.

The request for aspirational sustainable transport improvements would fail to meet the requirements of Regulation 122 of the CIL Regulations, as it has not been shown that the requested works are necessary to make the development acceptable in planning terms, are directly related to the development, and are fairly and reasonably related in scale and kind.

Parking

The proposed development is not intended to increase pupil capacity, and therefore parking demands from the school throughout the day would not change as a result of this development. The development will result in the need for parking within the site for evenings and weekends, however this will be able to be accommodated within the school site. Parking bays have been reconfigured on the site, and as a result, the quantum of parking remains as existing i.e. 116 no. on-site car parking spaces.

To further aid parking concerns, the proposal includes a community use agreement which will ensure that scheduling of activities and clubs are carried out in a way to reduce peak crossover times.

Therefore, the proposed development would be in accordance with the NPPF, Policy ID3 of the

LPSS, Policy ID10 of the LPDMP and the Parking SPD and is acceptable in relation to highways and parking.

Flooding and Drainage

The NPPF and PPG seeks to avoid placing inappropriate development in areas at risk of flooding and direct development towards areas at lowest flood risk. Policy F7 of the NPPF seeks to ensure that development does not pose a risk of flooding to occupiers and users, and should not increase flood risk elsewhere. Policy P4 of the LPSS also seeks to ensure that development takes account of flood risk.

Policy F8 of the NPPF requires development to incorporate sustainable drainage systems, with multi-functional benefits, and designed in accordance with the National Standards. The PPG National Standards for Sustainable Drainage Systems provides guidance on developing drainage plans and references detailed industry guidance like The SuDS Manual [C753] by CIRIA to guide decisions about the design, maintenance, and operation of sustainable drainage systems.

The submitted FRA states that the site is located within Flood Zone 1 both now and in the future. The proposed development is considered to be a 'more vulnerable' development as per the NPPF definition, which is acceptable in Flood Zone 1.

The EA's Risk of Flooding from Surface Water map shows that part of the site is in an area of 'low to very low' surface water flood risk. The FRA and Surface Water Drainage Report states that infiltration is a viable method of surface water disposal, and an infiltration tank and existing soakage will be used as part of the drainage strategy. Therefore, the drainage strategy will attenuate the surface water anticipated on site, inclusive of climate change scenarios, and would not cause an increase in flood risk to the site or surrounding areas.

As the site is only at risk from surface water, and the FRA adequately demonstrates that the layout and drainage strategy have taken into account flood risk and would ensure occupiers and users would remain safe from current and future surface water flood risk for its lifetime, the sequential test is not required.

Surrey County Council SuDs have not raised an objection to the proposed updated drainage strategy and recommended several planning conditions for detailed drainage designs.

The development would therefore be acceptable in relation to flood risk and sustainable drainage and would accord with Policy F7 and F8 of the NPPF, and Policy P4 of the LPSS.

Archaeology

Policy D3 of the LPSS and D23 of the LPDMP promote the conservation of heritage assets, including archaeological sites, in a manner which is appropriate to their significance. Policy HE5 of the NPPF states that where a development proposal involves, or has the potential to involve, a heritage asset with archaeological interest, an appropriate desk-based assessment and, where necessary, a field evaluation should be undertaken.

The application is supported by a desk based archaeological assessment produced by the Surrey County Council Archaeological Unit. The report suggests that the development would not impact on known heritage assets, but that the area is considered to have moderate to high potential for prehistoric archaeology.

The County Councils Archaeological Officer has confirmed that there are no objections to the development on the basis that a planning condition secures a written scheme of Investigation which is to be approved by the Local Planning Authority to carry out further investigations.

Planning Balance and Recommendation

S4 of the NPPF sets out a presumption in favour of development within settlements unless the benefits of doing so would be substantially outweighed by any adverse effects when assessed against the national decision-making policies in the Framework. This development is within the settlement, and therefore there is a presumption in favour of its approval, which is given substantial weight.

Policy HC4 of the NPPF gives substantial weight to the benefits of development which delivers new or improved community facilities where they would make a demonstrable contribution towards promoting good health, preventing ill-health, reducing health inequalities and supporting social interaction. Given the development involves an improved community playing pitch, which would be available to hire by community groups, substantial weight is given to these benefits.

Some minor economic benefits would stem from the construction period, but are given limited weight in the balance given the scale of development. Similarly, biodiversity improvements would be a benefit to the proposal, but as these are statutory, are given neutral weight in the balance.

As set out within the report, there would be a limited number of existing residential dwellings which would be subject to residual harm with regards to noise and light, after suitable prevention and mitigation measures have been incorporated. It is accepted that there would be residual harm caused to some properties which would not fully accord with the development plan. However, given the number of properties affected, the level of harm experienced, and the reduced hours of impact, the harm is afforded moderate weight.

In conclusion, and weighing in the balance, officers are of the view that the adverse impacts arising from the proposal would substantially outweigh the benefits of the scheme, and accordingly the recommendation is to approve the application, subject to conditions.

Recommendation

That delegated authority be granted to the Director of Planning to agree the final wording of the planning conditions and grant planning permission subject to an agreement being entered into to secure:

Equality, diversity, and human rights

In reaching its decision on a planning application the Council is required to have regard to the duties contained in section 149 of the Equality Act 2010, known collectively as the public sector equality duty.

Section 149 provides that the Council must have due regard to the need to -

- eliminate discrimination, harassment, victimisation
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and

- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Officers have had due regard to these matters when assessing this application and have concluded that neither the granting nor the refusal of this application would be likely to have an impact on protected groups and, therefore, that these considerations would not weigh in favour of or against this application.

Consideration has also been given to Articles 1 and 8 of the of the First Protocol of the European Convention on Human Rights. It is not considered that the decision would result in a violation of any person's rights under the Convention.