

**App No:** 22/P/01083  
**Appn Type:** Full Application  
**Case Officer:** Peter Dijkhuis  
**Parish:** Ash  
**Agent :** Mr. James McConnell  
McConnell Planning  
20 Niagara Avenue  
Ealing  
London  
W5 4UD

**8 Wk Deadline:** 19/09/2022

**Ward:** Ash Wharf  
**Applicant:** Mr. Michael Birch  
Bellway Homes (South London) Ltd  
Regent House  
1-3 Queensway  
Redhill  
RH1 1QT

**Location:** Orchard Farm, Harpers Road, Ash, Guildford, GU12 6DE  
**Proposal:** Erection of 51 dwellings with associated open space, landscaping and parking.

## **Executive Summary**

### **Reason for referral**

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

### **Key information**

Members should note that this application is the subject of a non-determination appeal and as such, the decision on this proposal will be taken by the Secretary of State through the Planning Inspectorate. The appeal (reference APP/Y3615/W/22/3312863) will be heard by way of a Hearing that scheduled to take place on 20 and 21 June 2023.

Correspondence received from the Planning Inspectorate notes that Council's Statement of Common Ground, Statement of Case, and list of Conditions are required by the 19 April. However, taking into account the fact that the application needs to be considered by the Planning Committee, the Planning Inspectorate has agreed an extension to the submission timescales until 26 April. Once the views of the Planning Committee are known, Officers will then be able to prepare the Council's Statement of Case.

Had the Council retained the right to determine this application, the recommendation would have been to approve the proposal subject to conditions and the completion of a s106 agreement. The reasons for this recommendation are set out below.

For information, it is noted that there is an identical duplicate application (reference 22/P/02121) for this site. The Council does still retain the control to determine that application itself and it will be considered in due course.

In terms of 22/P/01083 before you, this is a Full Planning Application for the provision of 51 dwellings with associated public and private open space, habitat and riparian SUD landscape creation and enhancement, and financial contributions to physical, social and community infrastructure, at Orchard Farm, Harpers Road, Ash.

The site benefits from being part of the wider Policy A31 'Land at the south and east of Ash and Tongham' allocation in the adopted GBC Local Plan for c.1,750 dwellings and related infrastructure. While the site currently benefits from a semi-rural/ countryside setting it is acknowledged that current development and applications for the surrounding sites that make up this strategic allocation will fundamentally change the character of the landscape setting. This approach is accepted in policy. We note that surrounding sites have made planning submissions and that Wildflower Meadows to the immediate north of this site is currently under construction as part of this allocation.

It is noted that there are no statutory authority objections to this application.

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

The site is an allocated site within the Guildford Local Plan as identified in Policy A31 'Land at the south and east of Ash and Tongham' and forms part of Policy S2 'Planning for the borough - our spatial development strategy' to inform and enable the Guildford Local Plan as adopted. The collective Strategic Site is now designated as being part of the urban area of Ash and Tongham. Whilst there would be an inevitable change in the character and appearance of the area, the principle of development has already been found to be acceptable.

The application as evidenced accords with the Guildford Local Plan and supporting policy. The application does not conflict with any policies that protect surrounding heritage assets (Ash Manor Grade II\* and setting) and/or environmentally sensitive areas (Thames Basin Heaths SPA et al) and proposes SANG mitigation in line with policy.

The provision of 51 dwellings (40% affordable) would continue to address the supply of local housing, which should be afforded moderate planning weight. The associated benefits including short-term employment to the construction industry; supporting Guildford and Ash's growth as a local employment, commercial and retail centre; and, further economic benefits from the spend of future occupants, which should be afforded moderate weight in favour of the application. Paragraph 81 of the NPPF suggests significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities generated by development.

The proposed dwellings are considered to provide a good level of internal and external amenity for future residents, fully compliant with the Nationally Described Space Standards (NDSS). The applicant has submitted an Energy Statement and Sustainability Statement to address policy, and the new Building Regulations.

As regards pedestrian and cyclist safety, the application has evidenced mitigation, including providing a network of pedestrian and cyclist footways, connecting into Wildflower Meadows' estate roads, leading to Ash Station and Ash, which provides a safer route than using Harpers Road. No objections have been raised by the County Highway Authority with regard to matters of highway safety or capacity.

Overall, the adverse impacts of the scheme would not significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework and the Guildford Local Plan taken as a whole and therefore, the application is recommended for approval.

**RECOMMENDATION:**

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

- the delivery of 21 affordable housing units;
- provision of SAMM contributions;
- secure SANG capacity to mitigate the impact of the development on the Thames Basin Heaths Special Protection Area;
- contribution towards police infrastructure;
- contribution towards early years, primary and secondary education projects;
- contribution towards open space provision infrastructure in the area;
- contribution towards highway safety improvements and pedestrian and cyclist infrastructure improvements in the area;
- contribution towards Ash Road Bridge; and,
- provision that the applicant gives free and unfettered access to the estate roads, pathways, and cycleways.

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 shall be agreed in consultation with the Chairman of the Planning Committee and lead Ward Member.

(ii) That upon completion of the above, the application be determined by the Executive Head of Planning Development / Joint Strategic Director Place. The recommendation is to approve planning permission, subject to conditions.

(iii) 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 application may be refused on the basis that the necessary mitigations to offset the impact of the development cannot be secured.

**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:

1. Presentation Planning Layout 111909-BEL-SL-01-C. Updated 28.11.2022
2. Supporting Planning Layout 111909-BEL-SL-02-C. Updated 28.11.2022
3. Storey Heights Layout 111909-BEL-SL-03-C. Updated 28.11.2022
4. Tenure Layout 111909-BEL-SL-04-C. Updated 28.11.2022
5. Unit Types Layout 111909-BEL-SL-05-C. Updated 28.11.2022
6. Location Plan 111909-BEL-SL-06. Date 10.06.2022
7. Indicative Access Points into Adjacent Allocation Land 111909-BEL-SL-IAP-A. Updated 07.12.2022
8. 111909-BEL-SL-LINKS01. 02.12.2022
9. Overarching walking and cycling plan. ITB16016/ Fig. A1;
10. Perspective 01 11909-BEL-SL-PER01-B. Updated 07.12.2022
11. Perspective 02 11909-BEL-SL-PER02-B. Updated 07.12.2022
12. Street Scene – illustrative PV panels added 111909-BEL-SL-SS01. Date 27.03.2023
13. Street Scene 02 111909-BEL-SL-SS02-B. Updated 07.12.2022
14. Street Scene 03 111909-BEL-SL-SS03-B. Updated 07.12.2022
15. Landscape Masterplan 017-APA-ZZ-XX-LA-L-1002 Rev P05. Date 06.12.2022
16. Landscape Strategy Plan 3000-APA-ZZ-GF-LA-L-1001 Rev P06. Date 06.12.2022
17. Dexter House Type 111909-DE-M-E1. Date 17.05.2022
18. Dexter House Type 111909-DE-M-P1. Date 17.05.2022
19. Dexter House Type 111909-DE-V-E1. Date 17.05.2022
20. Dexter House Type 111909-DE-V-E2. Date 13.05.2022
21. Dexter House Type 111909-DE-V-P1. Date 07.03.2022
22. Dexter House Type 111909-DE-V-P2. Date 17.05.2022
23. Draper House Type 111909-DR-V-E1. Date 17.05.2022
24. Draper House Type 111909-DR-V-P1. Date 17.05.2022
25. Fisher & Piper House Types 111909-FP-V-E1. Date 17.05.2022
26. Fisher & Piper House Types 111909-FP-V-P1. Date 17.05.2022
27. Fuller House Type 111909-FR-V-E1. Date 16.05.2022
28. Fuller House Type 111909-FR-V-P1. Date 16.05.2022
29. Mason House Type 111909-MA-M-E1. Date 13.05.2022
30. Mason House Type 111909-MA-M-P1. Date 17.05.2022
31. Mason House Type 111909-MA-V-E1. Date 17.05.2022
32. Mason House Type 111909-MA-V-P1. Date 17.05.2022
33. Millwright House Type 111909-MW-M-E1. Date 13.05.2022
34. Millwright House Type 111909-MW-M-P1. Date 17.05.2022
35. Millwright House Type 111909-MW-V-E1. Date 13.05.2022
36. Millwright House Type 111909-MW-V-P1. Date 17.05.2022
37. Philosopher House Type 111909-PH-M-E1. Date 13.05.2022
38. Philosopher House Type 111909-PH-M-P1. Date 17.05.2022
39. Philosopher House Type 111909-PH-V-E1. Date 17.05.2022
40. Philosopher House Type 111909-PH-V-P1. Date 17.05.2022
41. Terrace 01 111909-T01-V-E1. Date 13.05.2022
42. Terrace 01 111909-T01-V-E2. Date 13.05.2022

43. Terrace 01 111909-T01-V-P1. Date 13.05.2022
44. Terrace 02 111909-T02-V-E1. Date 17.05.2022
45. Terrace 02 111909-T02-V-E2. Date 17.05.2022
46. Terrace 02 111909-T02-V-P1. Date 17.05.2022
47. Terrace 03 111909-T03-V-E1. Date 17.05.2022
48. Terrace 03 111909-T03-V-E2-A. Date 24.10.2022
49. Terrace 03 111909-T03-V-P1-A. Date 24.10.2022
50. Terrace 04 111909-T04-V-E1. Date 17.05.2022
51. Terrace 04 111909-T04-V-E2. Date 17.05.2022
52. Terrace 04 111909-T04-V-P1. Date 17.05.2022
53. Terrace 05 111909-T05-V-E1. Date 17.05.2022
54. Terrace 05 111909-T05-V-E2. Date 17.05.2022
55. Terrace 05 111909-T05-V-P1. Date 16.05.2022
56. Terrace 06 111909-T06-V-E1. Date 17.05.2022
57. Terrace 06 111909-T06-V-E2. Date 17.05.2022
58. Terrace 06 111909-T06-V-P1. Date 17.05.2022
59. Terrace 07 111909-T07-V-E1. Date 17.05.2022
60. Terrace 07 111909-T07-V-E2. Date 17.05.2022
61. Terrace 07 111909-T07-V-P1. Date 17.05.2022
62. Terrace 08 111909-T08-V-E1. Date 17.05.2022
63. Terrace 08 111909-T08-V-E2. Date 17.05.2022
64. Terrace 08 111909-T08-V-P1. Date 17.05.2022
65. Terrace 09 111909-T09-V-E1. Date 17.05.2022
66. Terrace 09 111909-T09-V-E2. Date 17.05.2022
67. Terrace 09 111909-T09-V-P1. Date 17.05.2022
68. Weaver House Type 111909-WE-M-E1. Date 17.05.2022
69. Weaver House Type 111909-WE-M-P1. Date 17.05.2022
70. Watchmaker house type 111909-WA-V-E1. Date 02.12.2022
71. Watchmaker house type 111909-WA-V-P1. Date 01.12.2022
72. Garage Type 01 111909-GAR01. Date 27.05.2022
73. Garage Type 02 111909-GAR02. Date 27.05.2022
74. Garage Type 03 111909-GAR03. Date 27.05.2022
75. Garage Type 04 111909-GAR04. Date 27.05.2022
76. Cycle Shed 111909-SH01 27.05.2022
77. Cycle Shed 111909-SH02 27.05.2022
78. Cycle Shed 111909-SH03 27.05.2022
79. Sub Station 111909-SUB01 10.03.2022
80. Tree Constraints Plan 1828-KC-XX-YTREE-TCP01Rev0 Feb 2022
81. Tree Protection Plan 1828-KC-XX-YTREE-TPP01RevB. 14.11.2022

List of all plans, drawings and documents which did not form part of the original application

82. Swept Path Analysis – Refuse Vehicle ITB16016-GA-009D.  
04.11.2022
83. Swept Path Analysis – Water Tanker ITB16016-GA-012C.  
04.11.2022
84. Swept Path Analysis – Refuse Vehicle ITB16016-GA-014D.  
04.11.2022

85. Street Scene – illustrative PV panels added 111909-BEL-SL-SS01.  
Date 27.03.2023

86. Overarching walking and cycling plan. ITB16016/ Fig. A1; nd.  
Submitted 31.03.2023

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

3. If the development hereby approved does not commence (or, having commenced, is suspended for more than 12-months) within one-year from the date of the planning consent, the approved ecological measures secured through condition(s) shall be reviewed and, where necessary, amended and updated. The review shall be informed by further ecological surveys commissioned to a) establish if there have been any changes in the presence and/or abundance of badgers, bats, reptiles, and protected species as identified; and, b) identify any likely new ecological impacts that might arise from any changes.

Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and approved in writing by the Local Planning Authority prior to the re-commencement of development. Works will then be carried out in accordance with the proposed new approved ecological measures and timetable.

As species are mobile and habitats can change and become more or less suitable, it is important that the surveys reflect the situation at the time on any given impact occurring to ensure adequate mitigation and compensation can be put in place and to ensure no offences are committed.

Reason: to ensure that the habitat is developed in a way that contributes to the nature conservation value of the site in accordance the NPPF and Policy D6 and P5 of the Guildford Local Plan.

4. No development shall take place until written confirmation has been obtained from the Local Planning Authority that Suitable Alternative Natural Green Space (SANG) to mitigate the impact of the development has been secured and no dwelling shall be occupied before written confirmation has been obtained from the Local Planning Authority that the works required to bring the land up to acceptable SANG standard have been completed.

Reason: Pre-commencement condition as the development is only acceptable if the impact on the Thames Basin Heaths Special Protection Area can be mitigated. This is reliant on the provision of SANG. Avoidance works associated with development need to be carried out prior to the occupation of the development so that measures can cater for increased number of residents to avoid adverse impact on the Thames Basin Heaths Special Protection Area in accordance the NPPF and Policy D5 and P6 of the Guildford Local Plan.

5. No development shall take place, including any ground works or works of demolition, until a Construction Transport Management Plan (CTMP) has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved CTMP shall be implemented and adhered to in full throughout the entire construction period. The Plan shall provide details as appropriate but not be restricted to the following matters:
- a. The anticipated number, frequency and types of vehicles used during construction;
  - b. Parking for vehicles of site personnel, operatives, and visitors;
  - c. Loading and unloading of plant and materials;
  - d. Storage of plant and materials;
  - e. Programme of works (including measures for off-site traffic management);
  - f. Provision of boundary hoarding behind any visibility zones, including provision to protected identified landscapes;
  - g. HGV deliveries and hours of operation;
  - h. Vehicle routing;
  - i. Provision and utilisation of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders);
  - j. Before and after construction condition surveys of the highway and a commitment to fund the full repair of any damage caused; and,
  - k. On-site turning for construction vehicles.

Reasons: Pre-commencement condition in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport in accordance with the requirements of the NPPF and in accordance with the Policy ID3(6) of the Guildford Local Plan.

6. No development shall take place (including demolition, ground works, vegetation clearance) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The approved CEMP shall be adhered to and implemented throughout the construction period in accordance with the approved details. The CEMP shall include, but is not limited to, the following:

Information on the persons/bodies responsible for identified activities associated with the CEMP that demonstrate they are qualified for the activity they are undertaking including an ecological Clerk of Works and lines of communication

Practical measures (both physical measures and sensitive working practices) to be used during the development in order to minimise environmental impact of the works (inter-alia, considering both potential disturbance and pollution including air quality (dust and PM10), noise, and including traffic routing to reduce vehicles emissions, compounds for storage of plant/machinery/materials, protective fencing, exclusion barriers and warning signs for the protection of existing hedgerows, trees and other landscape features to be retained, detailed method statements considering construction noise, vibration and lighting effects and plant operation, storage and spillage of oil/chemicals and soil protection measures (may be provided as a set of method statements);

- l. Noise assessment - the rating level (LA<sub>r</sub>,Tr) of sound emitted from any machinery associated with the construction shall not exceed the plant rating level limits specified for the relevant Working Hours. All measurements and assessments shall be made in accordance with the methodology of BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound' and/or its subsequent amendments;
- m. Any necessary mitigation for protected species and measures to protect retained trees, treed hedgerows and alongside the main watercourse feeding into the existing watercourse, during works;
- n. A Soil Management Plan including proposals for stripping and storing soil for later reuse on site in accordance with DEFRA's Construction Code of Practice for the Sustainable Use of Soil on Construction Sites September 2009;
- o. Risk assessment of potentially damaging construction activities;
- p. Lighting used for construction must be kept to a minimum and switched off when not in use. Lighting should be positioned so as not to spill on to adjacent land or retained vegetation. Night working (see Working Hours condition) should be avoided where possible to reduce lighting of sensitive habitats and disturbance to species;
- q. The timing of the works including timings to avoid harm to environmentally sensitive area or features and the times when specialist ecologists need to be present on site to oversee works;
- r. Implementation of a construction-phase drainage strategy to intercept, capture and attenuate surface water runoff to avoid detrimental impacts on the interest waterbodies from ground and/or surface water pollution. Chemicals and fuels must be stored in secure containers located away from watercourses or water bodies. Spill kits must be available on site;
- s. Measures to manage flood risk, both on and off the site, during the construction phase. This may be incorporated into the CEMP or form a standalone document;



- t. Use of protective fences, exclusion barriers and warning signs;
- u. Excavations must be covered or securely fenced (with no potential access points beneath fencing) when the construction site is closed to prevent entrapment of animals;
- v. A detailed method statement for the long-term management and control of Japanese Knotweed on the site including measures to prevent its spread during any operations and measures to ensure that any soils brought onto the site are free of the seeds/root/stem on any invasive plant listed under the Wildlife and Countryside Act 1981 (as amended) if evident on site;
- w. Detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and management (30-years) to be provided within the CEMP, or as a separate Ecological Management Plan report, secured through planning; and,
- x. Any necessary pollution protection methods.

Reason: Pre-commencement condition to ensure that any adverse environmental impacts of development activities are mitigated in accordance with Policy ID4(4)(5)(7) of the Guildford Local Plan.

7. No development above ground level shall take place until details of earthworks have been submitted to and approved in writing by the Local Planning Authority. These details shall include the proposed grading and mounding of land areas including the levels and contours to be formed, showing the relationship of proposed mounding to existing vegetation and surrounding landform. Where retaining walls of in excess of one meter in height are required the submitted construction details shall be certified by a 'Competent Person' and all development shall be carried out in accordance with the approved details.

Reason: Pre-commencement condition to ensure that the proposed development takes proper account of flood protection and mitigation and does not prejudice the safety and appearance of the locality in accordance with Policy P4 of the Guildford Local Plan.

8. No development shall commence until proposals for the protection of all existing trees and hedgerows to be retained on the site as approved, including the erection of robust protective fencing encompassing the root protection zone (RPZ), for the duration of construction works, have been submitted to and approved by the Local Planning Authority.

Works within the RPA should be undertaken in accordance with Tree Protection Plan (Ref. 1828-KC-XX-YTREE-TPP01.Rev.C; dated March 2022).

No development including permitted development shall be within the RPZ radius as set out in the Tree Survey Schedule plus a provision of 10% of the RPZ radius in order to protect TPO and retained trees from domestic intensification at ground root level.

Reason: Pre-commencement condition to ensure the protection of trees and hedgerows during construction in accordance with BS5837:2012 (Trees in Relation to Construction), and the creation of a high-quality public realm and landscape setting in accordance with Policy D1(1)(7) and P7(6) of the Guildford Local Plan.

9. No development above ground level shall take place until the details relating to the provision of accessible homes in terms of providing 10% of dwellings to be designed to Building Regulations M4 Category 2 (Accessible and adaptable dwellings) and 5% to M4 Category 3 (Wheelchair user dwellings) have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: Pre-commencement condition to ensure that the development reflects the requirement of the Building Regulations, NPPF Paragraph 130(f) Footnote 49, and in accordance with Policy H1(4) of the Guildford Local Plan.

10. This condition relates solely to below ground archaeological considerations. 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 by the Planning Authority.

Reason: To ensure that any archaeological evidence discovered during ground works is adequately recorded in accordance with the NPPF and Policy D18 of the Guildford Local Plan.

11. The development hereby approved shall not be first occupied unless and until the proposed highway works as submitted to and approved in writing by the Local Planning Authority are provided. The submitted details shall be in general accordance with drawing number ITB16016-GA-013 Rev C (i-Transport Technical Note; 6 October 2022). The development shall only be carried out in full accordance with the approved details.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with Policy ID3(6) of the Guildford Local Plan.

12. No above ground works shall take place (excluding ground works and construction up to damp proof course and the construction of the access) until detailed drawings, including levels, sections and constructional details of the proposed estate roads, surface water drainage, outfall disposal and street lighting to be provided, shall be submitted to and approved in writing by the Local Planning Authority. The estate roads shall be designed and constructed to a standard approved by the Local Planning Authority in accordance with the Highway Authority's standards.

Reason: In the interests of highway safety to secure satisfactory standards of access for the proposed development and for the benefit and convenience of the public at large in accordance with Policy ID1 and ID3 of the Guildford Local Plan.

13. No above ground works shall take place (excluding ground works and construction up to damp proof course and the construction of the access) until details and samples of the proposed external facing and roofing materials including colour and finish have been submitted to and approved in writing by the Local Planning Authority. The development shall only be carried out in accordance with the approved details and samples.

Reason: To ensure that the development reflects the character and/or appearance of the surrounding area, to preserve the visual amenities of the area, and that developments demonstrate a 'fabric first' approach in accordance with Policy D1, D4 and D14 of the Guildford Local Plan.

14. No above ground works shall take place (excluding ground works and construction up to damp proof course and the construction of the access) until the hard landscaping details have been submitted to and approved in writing by the Local Planning Authority.

The details should include but not limited to the following:

1. Proposed finished levels or contours;
2. Design, layout, and appearance of external amenity spaces;
3. Measures to protect soft landscape areas from car parking;
4. Design of other vehicle and pedestrian access and circulation areas (including street widths, pavements, and cycleways where relevant and other strategic public realm);
5. Hard surfacing materials (including road surfaces, cycleways, footpaths, parking space and other areas of hardstanding, kerbs, and tactile paving, etc);
6. Details of a co-ordinated street furniture strategy (including benches, bollards, bin storage, planters, sign and signals, lighting, M&E enclosures, tree guards, play equipment, etc); and,
7. Details of the installation of bat boxes, installation of bird boxes, and dead wood for invertebrates.

The development shall only be carried out in full accordance with the approved details.

Reason: to enhance the appearance of the development in accordance with Policy D6 and D7 of the Guildford Local Plan.

15. No above ground works shall take place (excluding ground works and construction up to damp proof course and the construction of the access) until there has been submitted to and approved in writing by the Local Planning Authority a plan/details indicating the positions, design, height, materials, and type of boundary treatment/means of enclosure to be erected around and within the application site. Development shall be carried out in accordance with the approved details and shall be maintained in perpetuity.

The provision of 2m high close boarded timber fences (Acoustic screen) is required for gardens close to the southern boundary of the site and exposed to noise from the rail line (Ref. Noise and Vibration Assessment report, Figure 14; December 2022).

Notwithstanding the provisions of Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking or re-enacting this Order with or without modification), no fences, gates or walls, or structures of any kind, shall be erected within the curtilage of any dwelling house forward of any wall of that dwelling house which fronts onto the estate road.

Reason: To safeguard the open plan character and enhance the appearance of the development in accordance with Policy D7 of the Guildford Local Plan.

16. No above ground works shall take place (excluding ground works and construction up to damp proof course and the construction of the access) until details of secure cycle storage facilities and the provision of charging points for two e-bikes facilities for the occupants of, and visitors to, the development hereby approved have been submitted to and approved in writing by the Local Planning Authority. These facilities shall be fully implemented and made available for user prior to the occupation of the development hereby permitted and shall thereafter be retained for such use at all times.

Reason: To ensure that satisfactory facilities for the parking of cycles are provided and to encourage travel by means other than private motor vehicles in accordance with Policy ID9(2)(3a)(4) and Paragraph 6.132 of the Guildford Local Plan.

17. No above ground works shall take place (excluding ground works and construction up to damp proof course and the construction of the access) until details for the storage of waste on the premises, including the design and position of storage facilities for bins and recycling have been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented prior to the first occupation of the development and thereafter maintained for the duration of the development.

Reason: In the interests of residential and visual amenity, and to encourage waste minimisation and recycling of domestic refuse, in the interests of sustainable development in accordance with Policy D2 of the Guildford Local Plan.

18. No above ground works shall take place (excluding ground works and construction up to damp proof course and the construction of the access) until the soft-landscaping details have been submitted to and approved in writing by the Local Planning Authority. The development shall only be carried out in full accordance with the approved details.

The details should include but not limited to the following:

1. Indications of all existing trees and hedgerows and their Root Protection Zone.
2. Design, layout, and appearance of green/amenity space including verges.
3. Schedules of plants, noting species, plant sizes and proposed numbers/densities as required appropriate; with reference to:
  - i. Policy P10 that encourages integrated biodiversity and developers will be expected to consider and promote opportunities for the creation and/or restoration of habitats appropriate to local context.
  - ii. We note that invasive and non-indigenous species that may affect the habitat value of the neighbouring SPA or contaminate surrounding water-courses will not be supported.
4. Written specifications (including cultivation and other operations) associated with grass and meadow plant establishment.

Reason: To ensure the provision, establishment, and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality in accordance with Policy D7 of the Guildford Local Plan.

19. No above ground works shall take place (excluding ground works and construction up to damp proof course and the construction of the access) until a full specification, protection and maintenance of all proposed tree planting has been approved in writing by the Local Planning Authority. The specification shall include the quantity, size, species, and positions or density of all trees to be planted, how they will be protected and the proposed time of planting in accordance with BS5837:2012 Trees in relation to design, demolition and construction – Recommendations.

A schedule of maintenance of the trees until successfully established, as a minimum five-years, is to be agreed in writing with the Local Planning Authority and implemented. The schedule shall include provision for replacement planting should establishment fail, such measures having regard to BS 8545:2014 Trees: from nursery to independence in the landscape – Recommendations.

Reason: To ensure the provision, establishment, and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality in accordance with Policy D7 of the Guildford Local Plan.

20. No above ground works shall take place (excluding ground works and construction up to damp proof course and the construction of the access) until a scheme for the provision of surface water constructed in accordance with the approved scheme has been submitted to and approved in writing by the Local Planning Authority in consultation with Surrey County Council Flood Lead Local Risk Authority (LLFA). The design must satisfy the SUDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SUDS, NPPF and Ministerial Statement on SUDS. The required drainage details shall include:

- a. Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) and 1 in 100 (+40% allowance for climate change) storm events and 10% allowance for urban creep, during all stages of the development. Associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 7.3 l/s.
- b. Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross-sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
- c. A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off-site will be protected from increased flood risk.
- d. Details of drainage management responsibilities and maintenance regimes for the drainage system.
- e. Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Reason: To ensure 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 in accordance with NPPF and Policy P4 and P11 of the Guildford Local Plan.

21. The development hereby approved shall take place in implementing the Energy Statement (Ref. PA-ES-HRA-BWSL-22-03; December 22) as submitted to and agreed in writing by the Local Planning Authority. The approved Statement shall be implemented and maintained for the lifetime of the development including occupation. This Statement should address, as a minimum, compliance with Building Regulations Part L 2021.

Reason: To provide a sustainable development including high levels of energy performance and carbon reduction in accordance with the NPPF and in accordance with Policy D2 and D16 of the Guildford Local Plan.

22. No above ground works shall take place (excluding ground works and construction up to damp proof course and the construction of the access) until detailed solar Photovoltaic (PV) calculations supported by Standard Assessment Procedure (SAP) report have been submitted to and agreed in writing by the Local Planning Authority. The calculations shall quantify the exact amount of PV required on each dwelling in order to achieve the emission rates for each dwelling set out in the Energy Statement. Solar PV panels shall be installed on the dwellings in accordance with the calculations.

Reason: To provide a sustainable development including high levels of energy performance and carbon reduction in accordance with the Building Regulations, the NPPF and in accordance with Policy D2 and D16 of the Guildford Local Plan.

23. No above ground works shall take place (excluding ground works and construction up to damp proof course and the construction of the access), a Lighting Design Strategy shall be submitted to and agreed in writing by the Local Planning Authority that specifies the provisions to be made for the level of illumination of the site and to control light pollution. The Strategy shall include the following:

1. Identify those areas/features on site that are particularly sensitive for bats, barn owls, dormice, and badgers and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging;
2. The type and design of lighting how and the exact location it will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent any species mentioned above or the occupiers of neighbouring residential occupiers; and,
3. Specifies the measures undertaken to control light pollution.

All external lighting shall be installed in accordance with the specifications and locations set out in the Strategy and these shall be maintained thereafter in accordance with the Strategy. Under no circumstances shall any other external lighting be installed without the express planning permission of the Local Planning Authority.

Reason: To protect the amenity of the locality and to ensure the protection and enhancement of wildlife in terms of light pollution in accordance with Policy D5 and D12 of the Guildford Local Plan.

24. No development shall take place above ground until a scheme for the installation of a High Speed wholly fibre broadband installed to each dwelling has been submitted to and agreed in writing by the Local Planning Authority. Thereafter, the infrastructure shall be laid out in accordance with the approved details and be made available for use on the first occupation of each dwelling. The approved infrastructure shall be implemented and maintained for the lifetime of the development

Reason: To ensure that the new development is provided with high quality broadband services and digital connectivity in accordance with NPPF Paragraph 114 and Guildford Local Plan (2019) Paragraph 4.5.16.

25. 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 08:00 and 18:00 Mondays to Fridays and between 08:00 am and 13:30 pm Saturdays and at no time on Sundays or Bank or National Holidays. Deliveries shall take place between 08:00 to 18:00 Monday to Friday only and not at all on Saturdays, Sundays, Public or Bank Holidays.

Reason: To protect the neighbours from noise and disturbance outside the permitted hours during the construction period in accordance with NPPF Paragraph 174 and Paragraph 185 and Policy D11 of the Guildford Local Plan.

26. The development hereby approved shall not be occupied unless and until the highway access works hereby as submitted and approved in writing by the Local Planning Authority have been constructed and provided:

4. Vehicular access to Harper's Road has been constructed and provided with footways, tactile paving, and visibility zones in accordance with the approved plans Drawing No. ITB16016-GA-016 (i-Transport Technical Note; 6 October 2022) and thereafter the visibility zones shall be kept permanently clear of any obstruction over 0.6m high;
5. Proposed pedestrian/cycle connection routes and potential future access areas have been provided in general accordance with Presentation Planning Layout (Ref. Drawing No. 111909-BEL-SL-01 Rev C); and,



6. The internal visibility splays and internal pedestrian crossing points with dropped kerbs and tactile paving have been provided in accordance with a scheme and timetable of completion to 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: A first-occupation condition to ensure that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with Policy ID3(6) of the Guildford Local Plan.

27. The development hereby approved shall not be occupied unless and until vehicle parking areas in accordance with the approved plan (Presentation Planning Layout; Drawing No. 111909-BEL-SL-01 Rev C) for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear in accordance with the Highway Authority's standards hereby as submitted and approved in writing by the Local Planning Authority have been constructed and provided and the vehicle parking spaces shall thereafter be retained for the sole benefit of the occupants of the dwelling for that use.

Reason: A first-occupation condition to provide adequate space for the parking of vehicles and to ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway in accordance with Policy ID10 of the Guildford Local Plan.

28. The development hereby approved shall not be occupied unless and until each of the proposed dwellings and 50% (SCC) of all visitor spaces are provided with a fast-charge Electric Vehicle charging point (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply), the remaining visitor parking bays should be provided with cabling for the future provision of charging points. To be in accordance with a scheme to 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: To ensure that the development meets the objectives of sustainable development and carbon neutral objectives and to encourage the use of electric cars in order to reduce carbon emissions in accordance with Policy ID10 of the Guildford Local Plan.

29. The development hereby approved shall not be occupied unless and until the approved Transport Statement (14 December 2022) relating to the Travel Plan Statement (Section 7.2 to 7.10) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the approved Statement shall be implemented and thereafter maintained and developed to the satisfaction of the Local Planning Authority.

Reason: To ensure the continued use of the public right of way and network of routes to promote walking and physical activity in accordance with NPPF Paragraph 98 and Paragraph 104 respectively, Manual for Streets (2007), and in accordance with Policy ID3(9) of the Guildford Local Plan.

30. The development hereby approved shall not be occupied unless and until a certificate demonstrating that Secured by Design (physical security) has been successfully achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason: A first-occupation condition to ensure that the development is acceptable in terms of crime and safety in accordance with NPPF and Policy D7(2d) and ID6(10b) of the Guildford Local Plan.

31. Drainage (as constructed), prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and agreed in writing by the Local Planning Authority in consultation with the LLFA. 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: A first-occupation condition to ensure the Drainage System is constructed to the National Non-Statutory Technical Standards for SUDS (DEFRA; March 2015).

32. 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 next available planting or sooner with others of similar size, species, and number, unless otherwise agreed in writing by the Local Planning Authority.

Reason: On-going condition to ensure the provision, establishment, and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality in accordance with Policy D7(1) of the Guildford Local Plan.

33. If within a period of one-year from the date of first seeding of landscape areas in the opinion of the Local Planning Authority seeded areas have not attained 80% cover, then the planting will be re-seeded on an annual basis to attain 100% cover, unless the Local Planning Authority gives written consent to any variation.

Reason: On-going condition to ensure the provision, establishment, and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality in accordance with Policy D7(1) of the Guildford Local Plan.

**Informatives:**

1. If you need any advice regarding Building Regulations please do not hesitate to contact Guildford Borough Council Building Control on 01483 444545 or [buildingcontrol@guildford.gov.uk](mailto:buildingcontrol@guildford.gov.uk)
2. 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:
  - a. Offering a pre application advice service;
  - b. 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; and,
  - c. 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 and the proposal is now deemed to be acceptable.

3. Lead Local Flood Authority Informatives:

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 their website.

4. Surrey County Council Highway Authority Informatives:

(a) The permission hereby granted shall not be construed as authority to carry out any works on the public highway. The Applicant is advised that prior approval and agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, or verge to form a vehicle crossover or to install dropped kerbs. The Applicant is advised that it is an offence to undertake any works within the highway prior to the agreement being in place. Please see [www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/vehicle-crossovers-or-dropped-kerbs](http://www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/vehicle-crossovers-or-dropped-kerbs).

(b) In the event that the access works require the felling of a highway tree not being subject to a Tree Preservation Order, and its removal has been permitted through planning permission, or as permitted development, the Applicant will pay to the Council as part of its license application fee compensation for its loss based upon 20% of the tree's CAVAT valuation to compensate for the loss of highway amenity.

(c) The permission hereby granted shall not be construed as authority to carry out any works (including Stats connections/diversions required by the development itself or the associated highway works) on the public highway or any works that may affect a drainage channel/culvert or water course. The Applicant is advised that a permit and potentially a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge, or other land forming part of the highway. All works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to three-months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see <http://www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/the-traffic-management-permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see [www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding advice](http://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice).

(d) The Applicant is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the public highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning, or repairing highway surfaces and prosecutes persistent offenders (Highways Act 1980 Sections 131, 148, 149).

(e) The Applicant is expected to ensure the safe operation of all construction traffic in order to prevent unnecessary disturbance obstruction and inconvenience to other highway users.

Care should be taken to ensure that the waiting, parking, loading, and unloading of construction vehicles does not hinder the free flow of any carriageway, footway, bridleway, footpath, cycle route, right of way or private driveway or entrance. Where repeated problems occur the Highway Authority may use available powers under the terms of the Highways Act 1980 to ensure the safe operation of the highway.

(f)The Applicant is advised that as part of the detailed design of the highway works required by the above conditions, the Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment – this will be at the Applicant's own cost.

(g)It is the responsibility of the Applicant to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Electric Vehicle Charging Points shall be provided in accordance with the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development 2022. If an active connection costs on average more than £3,600 to install, the developer must provide cabling (defined as a 'cabled route' within the 2022 Building Regulations) and two formal quotes from the distribution network operator showing this.

(h)The Applicant is advised that Public Footpath Number 356 runs to the north of the application site where highway improvement works are proposed, and it is an offence to obstruct or divert the route of a right of way unless carried out in complete accordance with appropriate legislation.

(i)The Highway Authority has no objection to the proposed development, subject to the above conditions but, if it is the Applicant's intention to offer any of the roadworks included in the application for adoption as maintainable highways, permission under the Town and Country Planning Act should not be construed as approval to the highway engineering details necessary for inclusion in an Agreement under Section 38 of the Highways Act 1980. Further details about the post-planning adoption of roads may be obtained from the Transportation Development Planning Division of Surrey County Council.

(j)The Highway Authority would wish to see the roads within the site that are not to be offered for adoption be laid out and constructed to standards at, or at least close to, adopted standards.

5. Thames Water Informative:

The Applicant should enter into a formal agreement with Thames Water Company to provide the necessary sewerage/ foul and surface water infrastructure required to service this development. The extent of the network proposed for adoption will be addressed at detailed design stage and agreed with Thames Water. Any remaining shared infrastructure will be maintained by an appointed management company which will including SUDs features and landscaping. The Applicant is advised that prior approval and agreement must be obtained from Thames Water before any works are carried out.

6. Network Rail Informative:

Due to the close proximity of the proposed development to Network Rail's land and the operational railway, Network Rail requests that the Applicant engages Network Rail's Asset Protection and Optimisation (ASPRO) team prior to works commencing. This will allow the ASPRO team to review the details of the proposal to ensure that the works can be completed without any risk to the operational railway.

7. Natural England Informative:

(a) Should continue to be consulted on all proposals where provision of site specific SANGS (Suitable Alternative Natural Green Space) or other bespoke mitigation for recreational impacts that falls outside of the strategic solution is included as part of the application. Natural England strongly recommend that Applicant proposing site specific infrastructure including SANGs seek pre-application advice from Natural England through its Discretionary Advice Service.

(b) The Applicant is reminded that it is an offence to damage or destroy species protected under separate legislation. Planning permission for a development does not provide a defense against prosecution under European and UK wildlife protection legislation. Separate licenses and consents may be required to undertake work on the site where protected species are found, and these should be sought before development commences.

(c) This planning permission does not authorise any interference with animals, birds, marine life, plants, fauna, and habitats in contravention of the requirements of the Wildlife and Countryside Act 1981, the Countryside and Rights of Way Act 2000 (CROW) and other legislation.

## **Officer's Report**

### **(1) INTRODUCTION**

1.1 This is a Full Planning Application for the provision of 51 dwellings with associated public and private open space, habitat and riparian SUD landscape creation and enhancement, and financial contributions to physical, social and community infrastructure, at Orchard Farm, Harpers Road, Ash.

1.2 The site benefits from being part of the wider Policy A31 'Land at the south and east of Ash and Tongham' allocation in the adopted GBC Local Plan for c.1,750 dwellings and related infrastructure. While the site currently benefits from a semi-rural/ countryside setting it is acknowledged that current development and applications for the surrounding sites that make up this strategic allocation will fundamentally change the character of the landscape setting. This approach is accepted in policy. We note that surrounding sites have made planning submissions and that Wildflower Meadows to the immediate north of this site is currently under construction as part of this allocation.

1.3 There have been no statutory authority objections to this application.

1.4 It is noted that the Applicant has submitted a dual application for the site which is identical to this proposal.

## **(2) SITE DESCRIPTION**

2.1 The application site is approximately 3.34 hectares in area, located and abutting to the north-east of the Reading to Gatwick railway line, west of Harpers Road, and south of the currently under-construction Wildflower Meadows (16/P/01679). The consented Ash Road Bridge will be immediately north-west of the site. The site is known locally as Orchard Farm.

2.2 The sites sole point of access is off Harpers Road which it shares with Oakside Cottage and Harpers House. Harpers Road is relatively narrow (4.1 to 4.5m wide), framed by trees, residential fencing/ hedging, and a ditch; it has a 30mph speed restriction. The road has no pavement but is used by pedestrians, cyclists, and horse riders as an informal shared route.

2.3 The site is predominantly used as paddocks with a rectangular area of land adjacent to the northern boundary forming open grassland of marginal habitat value. This area of open grassland is separated from the remainder of the site by a row of mature trees and landscaping. There are a number of small agricultural buildings on the site that are associated with the equestrian use which will be demolished as part of this application. These buildings lie within the main body of the site beyond the area of open grassland and along the access track off Harpers Road leading into the site.

2.4 The immediately surrounding area is currently predominantly semi-rural in character. However, the site benefits from being part of the wider Policy A31 'Land at the south and east of Ash and Tongham' allocation in the adopted GBC Local Plan for c.1,750 dwellings and related infrastructure. While the site currently benefits from a semi-rural/ countryside setting it is acknowledged that current development and applications for the surrounding sites that make up this strategic allocation will fundamentally change the character of the landscape setting forming an urban extension to Ash. This approach is accepted in policy.

2.5 Furthermore, the nature of the to-be-constructed elevated Ash Road Bridge over the railway line and the associated embankment, and the physical severance of the site by the railway line bounding the site to the south, creates a fairly self-contained site framed by existing landscape.

2.6 The site lies on the north-east boundary of Ash which hosts a range of commercial, social, and community services accessible to the development. Ash Station is c.575m away from the site, accessible on foot through Wildflower Meadows and the Public Right of Way. There are numerous bus stops along Guildford Road to give broader public transport accessibility.

2.7 The site lies within the 400m to 5km buffer of the Thames Basin Heaths Special Protection Area. As part of the Local Plan preparation, the strategic allocation (Policy A31) was subject to a Habitat Regulations Assessment.

2.8 The Environment Agency has identified the site as Flood Zone 1 (low probability of flooding).

2.9 The landscape character assessment identifies the site as a) National Character Type 114: Thames Basin Lowlands; and, b) Guildford Landscape Character Assessment: E1 Wanborough Wooded Rolling Claylands. In terms of NPPF Paragraph 174(a) the site is not considered a valued landscape.

2.10 The site is located within the setting of various heritage assets, namely, Ash Manor (Grade II\*), Old Manor Cottage (Grade II\*), Church of St Peter (Grade II\*), Ash Manor Oast (Grade II), The Oast House (Grade II), and Oak Barn (Grade II) which are within either 250m or 500m catchment of the site. In this case the application would affect the (distant) setting significance of Ash Manor (Grade II\* listed building), and its associated Oast House and stable, as well as Oak Barn (all Grade II).

### (3) PROPOSAL

3.1 This application seeks: Full Planning Application for the erection of 51 dwellings with associated open space, landscaping, and parking. Land at Orchard Farm, Harper's Road, Ash GU12 6DB.

3.2 The masterplan provides a significant landscape and habitat corridor (circa 1.48ha) that wraps/frames the development to the western and northern boundaries accommodating flood capacity/ SUDs and creating a series of varying landscape spaces for residents and the surrounding local community. The landscape strategy provides a network of pedestrian and cycleways that integrates with the adjacent areas to enable permeability across the Strategic Site. The landscape strategy creates screening of the development from long-distant views from the Ash Manor complex (Listed), retaining the heritage setting in part.

3.3 The residential development is designed as a tight cluster of housing to the eastern and south-east corner of the site. The houses are set to create street enclosure and frame long-views from the access street towards St Peter's Church, Ash; and, the internal streets towards the landscape frame and stream corridor along the northern boundary.

3.4 The development will deliver 40% affordable housing, provided in compliance with policy requirements and addressing local need; in principle, the tenure and dwelling type mix is supported by GBC Housing Officer subject to conclusion of a S106. The affordable housing (Affordable Rent, Affordable Shared Ownership, and First Homes) is pepper-potted across the development.

#### 3.5 Table 1: APPLICATION DETAILS

Dwelling description		
Dwellings	Number	Percentage
Market	30	c.60%
Affordable	21	c.40%
<b>Total</b>	<b>51</b>	

Tenure Details / Property Size						
Tenure	1 bed	2-bed	3-bed	4-bed	5-bed	Total
Market	0	6	14	9	1	30
Affordable	5	9	6	1	0	21



<b>Total</b>	<b>5</b>	<b>15</b>	<b>20</b>	<b>10</b>	<b>1</b>	<b>51</b>
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3.6 The delivery of market vs affordable housing addresses Policy H2 (Affordable Housing) and Policy H7 (First Homes).

3.7 10% of dwellings proposed have been designed to Building Regulations M4 Category 2 (Accessible and adaptable dwellings), and 5% to M4 Category 3 (Wheelchair user dwellings).

3.8 The proposal includes a range of one to five-bedroom house types, all two-storey, detached with dedicated parking and rear gardens; and, two apartment buildings in a similar architectural style, two-storeys, facing towards the surrounding parklands.

3.9 The application provides: 92 residential parking spaces; 10 visitors parking; 22 garages; SMART EV charging points to each dwelling; and, cycle storage (sheds) at a rate of one/bedroom.

3.10 The application proposes improvements to public highways (Harpers Road and at Guildford Road junction); and, makes financial contributions to the Ash Road Bridge infrastructure, SANG land off-set, SAMM tariff, off-site open space provision, NHS, education, and Sussex Police in line with policy requirements. These are set out in greater detail further in this report.

#### **(4) RELEVANT PLANNING HISTORY**

22/P/02121 - Full Planning Application for the erection of 51 dwellings with associated open space, landscaping, and parking. Currently under consideration.

Applications in the surrounding area which may be of some relevance to the determination.

<b>Reference and address:</b>	<b>Description:</b>	<b>Decision:</b>
23/P/00067 Land at May and Juniper Cottages	Reserved matters application pursuant to outline permission 18/P/02308	Registered
22/P/00977 Streamside, Harpers Road	Outline application for the demolition of existing house and outbuildings and erection of 22 new dwellings with associated parking and creation of new vehicular access.	Registered
21/P/01211 Land at May and Juniper Cottages	Reserved matters application pursuant to outline permission 18/P/02308	Awaiting decision
20/P/01461 Land at Ash Manor	Erection of 69 dwellings with associated vehicular and pedestrian access from Ash Green Road, parking, and secure cycle storage, on site open space, landscape, and ecology management and, servicing.	Non-determination Appeal submitted  Appeal dismissed (2021)

19/P/01460 Ash Road Bridge		Approved
18/P/02308 Land at May and Juniper Cottages	Outline application for development of 100 dwellings (including 40 affordable homes) with access to be determined, with associated garages, parking, open space, landscaping and play areas (layout, scale, appearance, and landscape to form the reserved matters).	Approved
16/P/01679 Land south of, Guildford Road	Outline planning permission for 154 units, including 54 affordable units with associated internal access, streets, car parking and landscaping. Matters to be considered: Appearance, landscaping, layout, scale, and the details of accesses within the site.	Approved (Wildflower Meadows)

## **(5) PLANNING POLICIES**

National Planning Policy Framework (NPPF) 2021: the following policies are relevant to the application:

Chapter 2. Achieving sustainable development  
 Chapter 4. Decision-making  
 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 places  
 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

National Planning Practice Guidance

National Design Guide (2021)

The South East Plan (2009): (revoked 2013); Retained Policy NRM6 Thames Basin Heath Special Protection Area (SPA).

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

Policy H6 Review mechanism (Housing)  
 Policy H7 First Homes  
 Policy P6 Protecting important habitats and species  
 Policy P7 Biodiversity in new developments  
 Policy P9 Air quality and air quality management areas  
 Policy P10 Water quality, waterbodies, and riparian corridors  
 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 P6 External servicing features and stores

Policy D7 Public realm  
Policy D11 Noise impacts  
Policy D12 Light impacts and Dark Skies  
Policy D14 Sustainable and low impact development  
Policy D15 Climate change adaption  
Policy D16 Carbon emissions from buildings  
Policy D18 Designated heritage assets  
Policy ID6 Open Space in new developments  
Policy ID9 Achieving a comprehensive Guildford Borough cycle network  
Policy ID10 Parking standards for new development

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

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 P4 Flooding, flood risk and groundwater protection zones  
Policy P5 Thames Basin Heaths Special Protection Area (SPA)  
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 A31 Land to the south and east of Ash and Tongham

Supplementary Planning Documents/ Guidance:

Parking Standards for New Developments (2023)  
Climate Change, Sustainable Design, Construction and Energy Supplementary Planning (2020)  
Surrey County Council Vehicular and Cycle Parking Guidance (2018)  
Public Art Strategy (2018)  
Planning Contributions SPD (2017) and (2023)  
Thames Basin Heaths Special Protection Area Avoidance Strategy (2017)  
Guidance on the storage and collection of household waste for new developments (2017)  
Surrey County Council - Vehicle, electric vehicle, and cycle parking guidance for new developments (2012) as amended  
Sustainable Design and Construction SPD (2011)  
Guildford Landscape Character Assessment (2007)  
Residential Design Guide SPG (2004)

The Strategic Development Framework (SDF)(2020): Chapter 7 Ash and Tongham.

Five Year Housing Land Supply (updated January 2023)

The above individually or cumulatively form a material consideration.

## **(6) CONSULTATION**

6.1 It is noted that this should be viewed as a duplicate planning application (to 22/P/02121) by the Applicant and consequently in preparing this report we have reviewed responses from statutory consultees/ authorities, Ash Parish Council, and the local community as submitted across both planning portals and submitted evidence. We would suggest that both are reviewed as forming a material consideration in determination and are summarised below.

6.2 Members are reminded that the consultation responses are available to view in full on the Council's website.

### **Statutory consultees**

6.3 Surrey County Council Highway Authority: No objection (subject to Conditions)

[Officer's Note: The applicant has motivated their application on the basis that Harpers Road is suitable for the increased vehicle traffic generated by this application (and the Streamside site), and that any concerns regarding pedestrian and cyclist movement would be addressed by the provision of a network of routes that connect from the site through Wildflower Meadows and the Public Right of Way (PRoW) to Ash. Officers have worked with the County Highway Authority to ensure that this network is deliverable and provided – in some case across third-party lands in the gift of the applicant's company Bellway, and by SCC. This would address the requirements of NPPF Paragraph 8 Sustainable development and accessibility].

SCC response is subject to conditions requiring the implementation of a package of highway improvement measures (provisionally, Harpers Road and junction with Guildford Road) and a contribution to the PRoW improvements to enable pedestrian and cyclist connections from the site to Ash and surrounds. The proposed development has been considered by the County Highway Authority who recommend an appropriate agreement should be secured before the grant of permission. Conditions as required by SCC are incorporated into the Case Officer's report.

Financial contribution: *'to go towards highway safety/highway improvement schemes within the vicinity of the site'*.

6.4 Surrey County Council Lead Local Flood Authority (LLFA): No objection (subject to Conditions)

[Officer's Note: It is noted that the site is in Flood Zone 1. Displaced flood and flood storage issues arising from the construction of the Ash Road Bridge impacting on the local watercourse have been addressed within this application to the satisfaction of the LLFA].

The County Council stated that *'Our advice would be that, should planning permission be granted, suitably worded conditions are applied to ensure that the SUDS is properly implemented and maintained throughout the lifetime of the development'*. Conditions as required are incorporated into the Case Officer's report. In this regard, SCC refer to the Application's documents as reference: a) Flood Risk Assessment, Ardent, December 2022, Reference: 2103621-01 Rev B; b) SCC Surface Water Drainage Summary Pro-forma 2017 as submitted by applicant; and, c) Planning Statement, December 2022, McConnell Planning.

6.5 Surrey County Council Archaeologist: No objection (subject to Condition)

[Officer's Note: the Archaeology Officer agreed that the site had low archaeological value/ importance and any underground value could be address through a watching brief during site establishment and construction phase].

The County Council stated that the Applicant's report notes '*no designated heritage assets on the site itself and that the site has an apparently low potential for archaeological remains, although there is a higher potential for the medieval period*'. Issue (Written Scheme) to be addressed by Condition.

6.6 Surrey County Council Education Infrastructure: No objection (subject to financial contribution)

The County Council's CIL Justification Statement sets out that the following S106 financial contributions are being sought - a) Early years contribution; b) Primary contribution; c) Secondary contribution.

6.7 Natural England: No objection (subject to an HRA which is already discharged)

6.8 NatureSpace (Great Crested Newts): No objection (subject to Condition)

NS: We are satisfied with the ecological information provided and agree that a Precautionary Working Methods Statement (PWMS) would be appropriate. This must be written by a suitably qualified ecologist and submitted to the Local Planning Authority for approval. Issue to be addressed by Condition.

6.9 Network Rail: No objection (subject to an informative)

[Officer's Note: the Applicant has addressed the issues related to noise and vibrations for the residential dwellings adjacent to the railway line in the specification of materials and the provision of a 2m acoustic fencing to those rear gardens facing the railway line].

6.10 Environment Agency: The Environment Agency were approached for comment but as this site is Flood Zone 1, they noted that they do not wish to be consulted on this application.

**Guildford Borough Council internal consultees**

6.11 Urban Design Officer: No objection (subject to Condition)

[Officer's Note: the Applicant has been involved with the Council through a pre-application process to address and resolve masterplan layout, landscape issues, connectivity, and materials. The UD Officer's comments have been incorporated into this report].

Issues relating to ensuring the delivery of pedestrian and cycle connections between adjoining development parcels can be addressed by S106 Agreement.

6.12 Waste and Recycling (Environmental Services): No objection (subject to Condition)

Required that dwellings should incorporate bin storage area (3-4No. 240lt wheeled bins) for +3bed units. These issues can be addressed by Condition.

6.13 Housing Officer: No objection (subject to S106 Agreement)

### **Non-statutory consultees**

6.14 Surrey and Sussex Police: No objection (subject to S106 contribution)

6.15 Thames Water: No objection

6.16 Surrey Wildlife Trust: No objection (subject to Condition)

Subject to securing an Ecological Management Plan and a Construction Environmental Management Plan (CEMP). Issue to be addressed by Condition.

### **Parish Council**

6.17 Ash Parish Council: The Parish Council (PC) raise an objection to the proposal. The comments are summarised below.

[Officer's Note: the PC submitted a letter of objection and/or issues of concern. Officers have reviewed these comments against the Applicant's documentation to ensure that the issues raised have been addressed and/or mitigated in the application. Of particular concern has been the issue of pedestrian and cyclist safety on Harpers Road. The Applicant are providing new connectivity across this site that will link with Wildflower Meadows and the PRow to provide an alternative, traffic-free route to Ash and public transport options along Guildford Road. This strategy is endorsed by the County Highways Authority (CHA) and funding to enable such secured. Flooding and environmental address and/or mitigation has been tabled and endorsed by statutory authorities].

PC comments:

- Grave concern that only vehicular access onto site will be from Harpers Road [Officer's Note: no objection has been raised by the CHA with regard to highway safety or capacity];
- Concern that Harpers Road has no footpaths [Officer's Note: see Officer Note above];
- Concern that Harpers Road is unlit [Officer's Note: see Officer's Note above];
- Shared space (Harpers Road) - not safe for pedestrian users [Officer's Note: see Officer Note above];
- Concern about effect of the proposed vehicular link on the two existing properties, Harpers House and Oakside Cottage.
- Proximity of access point to narrow bridge over railway line [Officer's Note: no objections in this regard have been raised by the CHA].
- Concern about effect of heavy construction and vehicular traffic using Harpers Road [Officer's Note: a construction transport management plan is to be secured by condition and will manage the movement of construction traffic into and from the site].
- Flooding risk [Officer's Note: no objections have been raised by the LLFA or Environment Agency].
  
- Concern about safety issues for younger children in respect of proposed provision of natural play area in vicinity of a pond [Officer's Note: the application will only have standing-water during periods of retaining stormwater flood capacity; the dwellings offer natural surveillance outwards over this area which should offer visual safety].
- Possible detrimental effect on wildlife [Officer's Note: no objections have been raised by Surrey Wildlife Trust].
- Concern over effect on local amenities – schools, medical facilities.
- No easy access to public transport [Officer's Note: see Officer Note above];

- Potential noise source from railway line [Officer's Note: this issue has been extensively addressed in the fabric of the buildings, windows, and rear garden fencing].
- Proximity to TBHSPA [Officer's Note: any potential impact on the SPA can be mitigated in line with the Council's adopted Strategy].
- Footpath PRoW 356 may be used to access Guildford Road but PRoW narrow, unlit, unmade up and in ownership of SCC. May be regarded as unsafe method of access particularly in winter months [Officer's Note: this has been addressed by the application to the satisfaction of the CHA].

### 6.18 **Third party comments**

[Officer's Note: Officers have reviewed the submitted comments against both applications made on the site].

Letters of objection have been received (22/P/01083: 40No. and 22/P/02121: 31No. some duplicated across both applications). The following is a summary of the issues raised:

- Piecemeal development delivery of Local Plan's housing allocation (various applications been brought forward) [Officer's Note: this has been addressed by Officers to ensure integrated and inter-connected development across the various applications is delivered].
- Traffic and pedestrian, cyclist, horse rider risk at site's proposed (shared) entrance and along Harpers Road (Harpers Road has no footpath and is unlit) [Officer's Note: see above].
- Increased traffic on Harpers Road, Wyke Lane and Ash Green Road; at the junction Harpers Road and Guildford Road; application and cumulative impact from applications on roads. [Officer's Note: no objections in this regard have been raised by the CHA].
- Proposed bridge increases through traffic in local area.
- The access road should be via the development currently being constructed by Bellway, either to the north of the Ash Road Bridge as was the plan when the A29 allocation was put in place [Officer's Note: no objections in this regard have been raised by the CHA].
- Development is out of scale and out of character with rural locality; erodes countryside [Officer's Note: application part of strategic allocation].
- Increased flood risk to road and surrounding area [Officer's Note: no objections have been raised by the LLFA or Environment Agency].
- Introduce landscape buffer zone between development and The Cottage and Harpers House to give screening and residential privacy from new development.
- Impact on immediate residential amenity (noise, dust, light, construction activity, etc.) [Officer's Note: a construction transport management plan is to be secured by condition and will manage the movement of construction traffic into and from the site].
- Strain on community infrastructure: GP surgeries; schools; etc [Officer's Note: any potential impact mitigated in line with the Council's adopted Strategy via financial contribution].
- Impact on natural habitat and encroachment on countryside [Officer's Note: any potential impact on the SPA can be mitigated in line with the Council's adopted Strategy].

### **(7) PLANNING CONSIDERATIONS**

The main planning considerations in this application are:

- The principle of development (Planning policy)
- Housing need
- Impact on the character of the area and design of the proposal
- Impact on the setting of listed buildings

- Impact on neighbouring amenity
- Private amenity of proposed dwellings
- Highway/parking
- Flooding and drainage
- Sustainable energy
- Open space provision
- Impact on trees and vegetation
- Impact on ecology
- Impact on air quality
- Thames Basin Heaths SPA
- Planning contributions and legal tests
- Balancing exercise and public benefit
- Conclusion

(These considerations will be reviewed against planning policy, the evidence submitted by the Applicant, and the Planning Officer's review)

### **(7.1)The principle of development**

#### **Planning policy**

7.1.1 The National Planning Policy Framework (2021) requires applications to, at a principal level, to accord with Paragraph 7: '*The purpose of the planning system is to contribute to the achievement of **sustainable development***'; Paragraph 8 '*three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways a) an **economic** objective; b) a **social** objective; and, c) an **environmental** objective*'; and, Paragraph 11 the '*presumption in favour of sustainable development*'. In reviewing the application, it is considered that it accords with the intent of the NPPF (as bolded).

7.1.2 Section 70(2) of the Town and Country Planning Act 1990 provides that, in dealing with an application for planning permission, regard is to be had to the development plan so far as material to the application; and, regard to any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act (2004, as amended) requires that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The Development Plan for Guildford Borough Council comprises the: Guildford Borough Local Plan: Strategy and Sites 2015- 2034 (adopted April 2019), and the Guildford Local Plan: Development Management Policies (adopted March 2023) – collectively these will be referred to as the Guildford Local Plan.

7.1.3 Local Plan (2019) - Policy A31 Land to the south and east of Ash and Tongham: this Policy identifies the applicant site as part of a broader strategic allocation.

7.1.4 With the adoption of the Guildford Borough Local Plan: Strategy and Sites 2015-2034 (LPSS), this site is no longer designated as being within the Countryside Beyond Green Belt. The LPSS has allocated this site under policy A31, which is an amalgamation of separate sites around Ash and Tongham. In total the allocation is expected to deliver approximately 1,750 homes. Policy A31 sets out that development of these sites should incorporate the following requirements (inter alia as applicable):



- a) Appropriate financial contributions to enable expansion of Ash Manor Secondary School by additional 1FE (form entry);
- b) Appropriate financial contributions towards expansion of existing GP provision in the area or land and a new building for a new GPs surgery;
- c) Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road. This will help soften the edges of the strategic development location and provide a transition between the built-up area and the countryside beyond;
- d) Sensitive design at site boundaries that has regard to the transition from urban to rural;
- e) Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected;
- f) Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station; and,
- g) Proposed road layout or layouts to provide connections between both the individual development sites within this site allocation and between Ash Lodge Drive and Foreman Road, providing a through road connection between Ash Lodge Drive and Foreman Road, in order to maximise accessibility and to help alleviate congestion on the A323 corridor.

In reviewing the application, it accords with the policy requirements (1) to (12), Opportunities (1), and Key Considerations (1) to (12) as will be explained and set out below.

7.1.5 Strategic Development Framework SPD (2020): the SPD was produced as Paragraph 1.2.1 *'a guide for future masterplanning, planning and development of the strategic sites and to establish the Council's expectations of design quality'*; and, Paragraph 1.2.2 *'the SPD will be a material consideration in determining the appropriateness of planning applications and in moving forward through implementation, including the preparation of master plans by the developers to inform their planning applications as required by Policy D1 of the Local Plan. ...For the avoidance of doubt, the guidance provided within this SPD is applicable to all types of planning applications (i.e. outline, full and reserved matters)'*. In reviewing the application, it accords with policy requirements as set out in Chp7, addresses the development principles as illustrated in Fig.49, and landscape framework as illustrated in Fig.50. This is discussed in greater detail in the main body of the report.

7.1.6 In terms of NPPF Paragraph 74 it is noted that the Council has identified a **6.46-year housing land supply**, currently has an up-to-date Development Plan, and consequently the NPPF Paragraph 11(d) titled balance is not enacted.

7.1.7 In terms of Section 38(6) of the Planning and Compulsory Purchase Act, the Act requires that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. There are no material considerations and consequently the application is to be determined against the development plan.

7.1.8 The principle of 51 dwellings on this site accords with policy and is deemed acceptable, subject to general compliance with Policy A31, and relevant local and national policies as enacted.

## **(7.2) Housing need**

### **Planning requirement - delivery**

7.2.1 NPPF Paragraph 60 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'*; and, Paragraph 62 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)'*. As part of the allocation under Policy A31 the application will make an important contribution to meeting the housing requirement, and housing mix, as identified in the Guildford Local Plan.

7.2.2 In terms of NPPF Paragraph 73(d) *'make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation'*. In terms of deliverability, the Applicant's parent company (Bellway) have evidenced delivery of planning consent with the construction of Wildflower Meadows to the immediate north of this application which gives some certainty to delivery of this application. This will ensure the provision of an additional 51 dwellings early in the plan period.

### **Affordable housing**

7.2.3 Policy H2 of the Guildford Local Plan requires H2(2) 'The Council seeks at least 40% of the homes on application sites to be affordable'; H2(4) 'The tenures and number of bedrooms of the affordable homes provided ...must contribute, to the Council's satisfaction, towards meeting the mix of affordable housing needs identified in the Strategic Housing Market Assessment 2015, or subsequent affordable housing needs evidence' as concluded with the Council's Housing Officer.

7.2.4 The application delivers 40% (21 dwellings) in compliance with policy. In terms of the tenures, the applicant proposes a) 15 Affordable Rent – 3No. 1bd, 6No.2bd, 6No. 3bd; b) 5 First Homes – 2No. 1bd, 3No.2bd, 0No. 3bd; and, c) 1 Shared Ownership – 0No. 1bd, 0No.2bd, 1No. 4bd. This meets with the Council's 70/30 tenure split. The proposed affordable units are integrated within the development and are pepper-potted across the site.

7.2.5 The Council's Housing Officer is supportive of the application and notes (March 2023) 'within the context of providing a policy compliant tenure mix of affordable homes, including First Homes, the Housing Service would support the bias towards more larger family homes in the application overall, including in the affordable tenure, but also given the specific context and viability of the development overall'. The Council's Housing Officer is satisfied that the Affordable Housing mix accords with Policy H7 First Homes.

7.2.6 As such, the proposal is considered to be compliant with policy in this regard.

### Dwelling mix

7.2.7 Policy H1(1) states that 'new residential development is required to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment (SHMA). New development should provide a mix of housing tenures, types, and sizes appropriate to the site size, characteristics, and location'. The proposed dwelling mix and the SHMA requirement is set-out below.

<b>Table 2</b>			
Overall Housing Mix	No.	SHMA Req	Provided
1 bed	5	20%	10%
2 bed	15	30%	29%
3 bed	20	35%	39%
4 bed+	11	15%	22%
<b>Total</b>	<b>51</b>		

<b>Table 3</b>			
Market Mix	No.	SHMA Req	Provided
1 bed	0	10%	0%
2 bed	6	30%	20%
3 bed	14	40%	47%
4 bed+	10	20%	33%
<b>Total</b>	<b>30</b>		

<b>Table 4</b>			
Affordable Mix	No.	SHMA Req	Provided
1 bed	5	40%	24%
2 bed	9	30%	43%
3 bed	6	25%	29%
4 bed+	1	5%	4%
<b>Total</b>	<b>21</b>		

7.2.8 It is noted that, while the unit mix is not strictly compliant with policy, the mix is skewed towards larger properties to address the need for family housing and is supported by the Housing Officer (Note: average length of wait for applicants for 2 and 3bed dwellings in Guildford is 6years 6 months).

7.2.9 In this regard, it is noted that in the Inspector's Final Report (Paragraph 48) on the LPSS he stated 'as regards housing mix, the policy is not prescriptive but seeks a mix of tenure, types and sizes of dwelling, which the text indicates will be guided by the strategic housing market assessment. The policy also seeks an appropriate amount of accessible and adaptable dwellings and wheelchair user dwellings'. While it is acknowledged that the proposed mix is slightly different to the SHMA guidance, it is noted that the SHMA mix is to be achieved over the whole of the housing market area and over the lifetime of the Plan. The flexibility set out in the policy must be used to achieve an acceptable mix across the borough. The application is not likely to cause any material harm to the Council's ability to deliver a compliant SHMA mix on a wider basis and overall, the proposed mix is deemed to be acceptable.

### Accessible units

7.2.10 Policy H1(4) requires that on residential developments of 25 homes or more 10% of new homes will be required to meet Building Regulations M4(2) Category 2 (Accessible and adaptable dwellings), and 5% to meet Building Regulations M4(3)(b) Category 3 (Wheelchair user accessible dwellings standard). In this regard the application is compliant. This will be secured by condition.

7.2.11 Overall, the application is considered to meet with NPPF Paragraph 60's objective of boosting the supply of homes and make provision for the needs of groups with specific housing needs. The Applicant can evidence delivery in the plan period which will bring forward much needed housing within the strategic allocation. In this regard the proposal is consistent with Policy H1 (Homes for all).

### **(7.3) Impact on the character of the area and design of the proposal**

#### **Planning policy**

7.3.1 NPPF (2021) Chp12 'Achieving well-designed places' sets out the expectation regarding Good Design: Paragraph 126 '*The creation of high-quality, beautiful, and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities*'.

7.3.2 The National Design Guide (2021) and National Model Design Code (2021) (as referenced in NPPF Paragraph 129 – thus forming a material consideration) defines the Ten Characteristic for good design as follows: context; identity, built form, movement, nature, public space, uses, homes & buildings; resources; and lifespan. These should be seen as guidance notes on NPPF Paragraph 130.

7.3.3 Guildford Local Plan Policy D1 Place shaping, requires all new development to: '*...achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set*', and Policy D4 (Achieving high quality design) which collectively sets-out the essential elements of place-making. Both these policies align with the NPPF and National Design Guide.

7.3.4 It is material to note that the Applicant has been in extensive pre-application dialogue with the Council's Urban Design Officer leading to reviews and comments that have shaped the application's approach, masterplan/ layout, dwelling arrangement regarding streetscape, and landscape.

7.3.5 The Strategic Development Framework SPD (2020) envisages the establishment of an extended 'garden' settlement to Ash set within a strong green and blue infrastructure framework with good access to outdoor play and open space. The Framework recognizes the historic rural/ countryside character of the area and requires new developments to be informed by a landscape-led approach to ensure that new development settles into the surrounding historic and riparian landscape. The design of the public realm should encourage active travel, including walking and cycling to local schools, shops, and public transport stops/ stations. Strong and legible pedestrian and cycle links between the various strategic sites should be included to encourage cohesion and integration over the longer term.

While the Framework does not suggest a Design Code, the intent suggests the creation of a sympathetic architectural style with possibly some variation to reinforce the idea of cohesion within this garden settlement.

### **Planning Officer's review**

#### **Impact on character of the area**

7.3.6 The site is semi-rural/ countryside in character, currently used as a paddock and grazing. The site has peripheral, fragmented treed hedgerows along the boundaries, mature tree planting and habitat along the small stream that runs across the site east to west, and open fields. Collectively, the site has limited landscape and habitat value.

7.3.7 While it is acknowledged that development of the site will materially alter the character and appearance of the site, this should be read in the context of the strategic allocation of c.1,750 dwellings and major infrastructure works to the Ash Road Bridge which will significantly, and irreversibly change the character and setting of the area and the Applicant site. This position is adopted in policy.

7.3.8 The application and surrounding emerging development has the potential to significantly **enhance** the landscape setting, improve the biodiversity/ habitat context, and create a new landscape framework for the area – this opportunity is welcomed. However, to manage the impact, the layout and design of individual applications must be of high quality, delivering development which positively contribute to the existing built form and landscape setting/ character of Ash and surrounds. We would suggest that the impact on the character of the area should be viewed as medium (post construction) to long-term (landscape establishment) beneficial.

7.3.9 It is recognised that development of the site will impact on the (distant) setting of Ash Manor Listed Building and impact on the peripheral setting of the historic location of Ash Green village in so far as this was read as a rural landscape. The masterplan restricts development to the eastern boundary of the site to afford an extensive landscape frame to the development to address these considerations of historic and rural setting. This should however be read in the context of the major infrastructure works to the Ash Road Bridge which will fragment the rural landscape. Rather, the application should be read in how it is can positively contribute to a new landscape narrative and habitat creation.

#### **Design and layout**

7.3.10 The scheme, which is described in the Applicant's Design and Access Statement (DAS) would comprise 51 dwellings accessed off the link to Harpers Road. Open space to the north would form part of the east-west corridor; and to the west would form part of the Ash Road Bridge strategic flood compensation area. The housing would be arranged around a main vehicle loop with dwellings overlooking the adjacent open space areas. A narrow lane and footpath would provide a link through the centre of the scheme. The intention is for open space to be planted and managed to provide wildlife habitat and public amenity. A buffer of landscape planting is proposed adjacent to the railway line. Formal and informal footpath routes would extend through the public open space areas including a main cycle/pedestrian route connection between the 'Land South of Guildford Road' site and the railway Station to the west. Landform would raise this link above the flood compensation area.

7.3.11 The layout has one point of entry off Harpers Road through an enhanced, framed landscape space before arriving at a simple loop street to structure the development. Provision has been made to extend this network into adjacent eastern sites if required.

7.3.12 The layout affords subtle short to long-distant views to the surrounding landscape and spire of St Peter's Church creating interesting visual linkages, legibility, and permeability.

7.3.13 The proposed internal layout is a simple and efficient loop road and perimeter block structure with public frontages and contained private rear gardens. To the south, rear gardens would back onto the railway and to the east gardens would abut the two adjacent land parcels. The indicative plan (Landscape Masterplan dwg 3017-APA-ZZ-GF-LA-L-1002/P05; dated December 2022) shows how the perimeter blocks could be formed with the adjacent sites within the broader allocation. This would establish a coherent masterplan across all three land parcels with good permeability and a clear structure of public fronts facing the street and secure rear gardens.

7.3.14 The dwellings are arranged to either enclose the internal loop streetscape, or they are arranged to face outwards affording overlooking of the landscape frame that surrounds the overall development. The dwellings form a 'jagged' edge creating subtle modulation of how primary façade or/and gable edges address the street. This creates visual interest within the conformity of a building material palette to create variation within a singular identity.

7.3.15 The footpath/cycle routes allow for connection to the open space within the adjacent Streamside and Wildflower Meadows schemes to ensure that connectivity and accessibility is deliverable in accordance with the SDF 'key pedestrian and cycle route' policy requirement.

7.3.16 Officers are supportive of the way car parking is tucked between dwellings to not visually dominate the streetscape. The need for cycle and bin storage is addressed within the rear gardens/ curtilage of the dwelling plot to ensure that these elements do not distract and create visual clutter to the streetscape.

7.3.17 The dwellings and apartments are all two-storeys in height, with single-storey garages. The dwellings are quite tight up to the road, creating an attractive 'village' street character, allowing for the maximising extent of private rear gardens. The apartments are of a similar architectural style and scale as the dwellings ensuring that they are read as part of the same urban fabric.

7.3.18 The streetscenes well illustrates a low-density development with sufficient variation in house type/ form, boundary walls connecting to garages, and sufficient space for street trees to mature to create visual and spatial interest. The buildings are relatively traditional in their form with the use of clay red bricks facades, some tile hanging to accentuate detail, clay tiled roofs, and PVs. Garages and boundary walls use the same building materials to ensure continuity and urban coherence. The different orientation of buildings, responding to different street edges, creates a variety of pitched and hipped roofs throughout the scheme.

7.3.19 Officers note that a similar house type, material and landscape palette have been used at Wildflower Meadows which has the collective benefit that the schemes over time will read as a singular extension, rather than as fragmented applicant sites.

The common palette further strengthens the reading of the landscape stream that runs between the two applications, creating a common visual edge to this landscape corridor. This approach is supported; as has been consented as such in the Wildflower Meadows application.

7.3.20 The general layout and scale is supported. A S106 Agreement will be necessary to ensure that connectivity with the adjoining sites within the allocation can be achieved. Detailed issues raised to be addressed by S106.

7.3.21 As such, the layout and scale, dwelling form and materials, and landscape/ habitat proposal are deemed to be acceptable and compliant with Policy D1 and Policy D4.

#### **(7.4) Impact on the setting of listed buildings**

##### **Planning policy**

7.4.1 National Planning Policy Framework ((2021): in terms of the NPPF Chapter 16 (Paragraph 194, 199 to 203) an assessment of the acceptability of an application in relation to impact to the historic environment is required to assess potential harm to the historic environment and setting, and review mitigation if appropriate. NPPF Paragraph 199 applies *'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). NPPF Paragraph 200 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'*.

7.4.2 For applications affecting the setting of a listed building Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a statutory duty to Local Planning Authorities *'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.'*

7.4.3 Guildford Local Plan Policy D3 (Historic environment) requires that *'the historic environment will be conserved and enhanced in a manner appropriate to its significance. Development of the highest design quality ...positive contribution to local character and distinctiveness will be supported'*; and it states: a) 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, b) 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.

7.4.4 Policy D18 (Designated Heritage Assets) and Policy D19 (Listed Buildings) requires that applications address proposals affecting designated heritage assets and their setting to inform an assessment of harm.

7.4.5 It is noted that the listed buildings in the vicinity of the site include, Ash Manor (Grade II\*), Old Manor Cottage (Grade II\*), Church of St Peter (Grade II\*), Ash Manor Oast (Grade II), The Oast House (Grade II), and Oak Barn (Grade II) which are within either within 250m or 500m catchment of the site. In this case the application may affect the (distant) setting of these listed buildings and this will be assessed in detail below [Officer's Note: the church is 600m from the site but is included as it is a significant heritage asset and informed the layout of the application].

7.4.6 In the Applicant's Heritage Statement (Rev 3; Dec 2022) they address that consideration was made as to whether any of the built heritage assets, as identified above, may include the applicant site as part of their setting and contribute to their overall heritage significance, and therefore may potentially be affected by the proposed development.

7.4.7 Within this consideration, weight is given to the fact that the construction of the railway in the 19th century resulted in a significant new feature in the landscape which physically severed the agricultural fields of the application site from Ash Manor and its agricultural complex. This physically created a visual disassociation of the application site from the Ash Manor heritage cluster of buildings and its broader long-distant setting. Paragraph 5.41 *'The proposals to incorporate housing on the site will ultimately change more distant views from the Manor and further diminish some of the appreciable rural character surrounding the Listed Buildings, in particular, the Grade II\* Listed Ash Manor. However, the proposals have included the retention of green space on the western boundary of the site, which will ensure that the rural surroundings are not wholly lost and views towards the site from the Manor will retain some verdancy'*. This position has been accepted in policy in bring forward the A31 allocation.

7.4.8 The applicant notes that while there is still a long-distant view towards the spire of the Church of St Peter from the site, and some visual relationship between the fields and Ash Manor complex, the actual historical relationship is less evident today. The Officer note that this relationship will be eroded with the construction of the elevated Ash Road Bridge and further housing within this sight line from the site towards the church spire and consequently it is considered that there is no impact on the church and it's setting.

7.4.9 The Applicant concludes that *'the proposals will remove some of the historic rural surroundings formerly associated with the Grade II\* Listed Building through the incorporation of new built form. The impact within views has been mitigated through the retention of green space within the western portion of the site and incorporation of vegetation along the southern boundary. The proposals are therefore considered to result in **'less than substantial harm'** at the lowest end of the spectrum to the Grade II\* Listed Ash Manor, Grade II Listed Ash Manor Oast and The Oast house and Grade II Listed Oak Barn'*.



7.4.10 The Council's Conservation Officer has assessed the proposal and its impact on the surrounding heritage assets. With regards to Ash Manor/Old Manor Cottage/Ash Manor Oast/Oast House/Oak Barn, the Conservation Officer concludes that *'it is fair to say that the proposals to incorporate housing on the site will ultimately change more distant views from the Manor and further diminish some of the appreciable rural character surrounding the Listed Buildings, in particular, the Grade II\* Listed Ash Manor. In doing so, the loss of the agricultural use and construction of housing on what was land historically associated with the Manor will result in a degree of harm to the assets setting through the erosion of the ability to appreciate the wider historic rural surroundings of the Manor. Nevertheless, we have noted elements of scheme's design and arrangement which help to mitigate its overall impact.'*

7.4.11 *'As already noted, the application site forms part of a larger allocation formed of several individual land parcels in separate ownership, with a number of these have already benefiting from consent schemes. This includes the site known as Land at May and Juniper Cottages, which has received outline permission for 100 dwellings (18/P/02308). The pertinence of mentioning this consented outline scheme is that the built form of the proposed development appears to have been purposefully located in the south-eastern and eastern part of the application site, essentially following from and continuing the development line of the consented outline scheme. The direction of this continuation tapers away from this complex of heritage assets, out towards the north-east. The actions of designing this scheme as a continuation of the May and Juniper has several benefits, but most significantly from a heritage perspective is that its visual impact would be somewhat absorbed by the neighbouring scheme, thereby mitigating its impact upon the setting of these assets.'*

7.4.12 *'The scheme also includes the retention of green space on the more sensitive western boundary of the site, which will ensure that the rural surroundings are not wholly compromised and views towards the site from the Manor complex will retain some verdancy. This verdancy would be reinforced further by the proposed additional planting between the new built form and the railway to provide additional screening and mitigation.'*

7.4.13 *'We can confirm that the harm identified would amount to **'less-than-substantial'** in terms of the NPPF. However, when taking into consideration the following factors listed below, the 'less than substantial harm' identified is at the **lower end of the spectrum**; factors: a) the design mitigation measures being implemented; b) the resultant built form would not be proximate or have a strong visual relationship with this complex of listed buildings; c) the views to and from the heritage assets were not intentionally designed; and, d) the setting has already experienced a degree of change through the introduction of the railway line.'*

7.4.14 *'Cumulative Impact: the inclusion of built form on land historically associated with the Listed Manor complex has already been approved on several adjacent parcels to the east of this group of assets, and whilst this proposed development would build upon further land historically associated with the Listed Buildings and be visible in views from the Grade II\* Listed Ash Manor, its discernible form would be more distant than the approved developments and would be somewhat absorbed/mitigated by the neighbouring scheme. We therefore considered that the cumulative effects would only result in a negligible increase to the level of harm, but that this harm would still remain at the lower end of **'less-than-substantial'**.*

7.4.15 Therefore, in conclusion, the Council's Conservation Officer notes that the proposal would result in **less-than-substantial** harm and it has therefore been advised that NPPF Paragraph 202 will need to be engaged. i.e. weighed against public benefits.

7.4.16 The Local Plan and Policy A31 enables considerable urban development within the surrounding context of the heritage assets (refer to planning applications: 16/P/01679 (Land at Guildford Road), consented; 18/P/02308 (Land at May and Juniper Cottages), consented); and, the elevated Ash Road Bridge and new road by-pass will further erode the rural setting of the heritage assets. Consequently, this should be assessed as an evolving rural landscape that can be protected through the introduction of structured landscaping to mitigate the visual impact of development on the setting of the heritage assets. An appropriately worded Condition to ensure that boundary landscaping is retained, introduced, and maintained in perpetuity to address the protection of the setting of the Listed Buildings could be secured.

7.4.17 It is acknowledged that the application results in some harm to the setting of the listed buildings on the Ash Manor complex, the application will have a **less-than-substantial harm** at the **lower end of the spectrum** on the significance and setting of the heritage asset. An assessment of the public benefits will be considered below.

#### **Public benefits and balancing exercise**

7.4.18 NPPF Paragraph 202 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 explains 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 8). 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.

7.4.19 To address this requirement, the public benefits of the application are set-out below:

- a. The proposal would deliver a total of 51 dwellings in a mix which is generally compliant with the Guildford Local Plan. The Applicant has evidenced delivery on the adjacent site which gives some certainty to ensure that dwellings are delivered early in the plan period, where there is projected to be significant demand for additional homes.
- b. 40% (21 dwellings) would be affordable dwellings. While it is acknowledged that this is what is required by policy, nevertheless, the provision of a large number of affordable dwellings with an acceptable mix, in a borough where there is significant demand for such dwellings is deemed to be a public benefit.

- c. The application will deliver a network of pedestrian and cycling routes, including financial contributions to improvements to the PRow, to connect with adjacent sites to enable safe pedestrian and cycling accessibility towards Ash Station, Ash, and bus stops along Guildford Road.
- d. The application provides an extensive habitat and landscape corridor and framework surrounding the development which will increase biodiversity, provided mitigation flood storage capacity (introducing riparian habitat), new native hedgerows on the site, and installing a range of ecological features including bat boxes. The proposal would therefore improve the ecological value of this part of the site and improve open space provision for the existing site and local community.
- e. This application will make financial contributions which will help to improve community facilities in the area including playspace, education and policing. While it is acknowledged that these contributions are required to mitigate the impacts of the development, nonetheless they will result in public benefits.

7.4.20 Overall, the public benefits of the application are wide ranging. It is considered that the scale of public benefits is sufficient in this instance to outweigh the identified heritage harm. In terms of Policy D3, *'the impact of the development proposal on the significance of heritage assets and their settings has been considered in accordance with case law, legislation and the NPPF*, the application is considered to be compliant with the requirements of policy

### **(7.5) Impact on neighbouring amenity**

7.5.1 Policy D5 requires that *'Development proposals ...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; and, f) Odour, fumes and dust'*.

7.5.2 The application site has no immediate neighbouring residential properties to the southern, western, and northern boundary (albeit that Wildflower Meadows will form a future residential edge, but this is assessed as under-construction, and consequently impact from this application on Wildflower Meadows is not a material consideration).

7.5.3 Streamside plot, located on the eastern boundary, is currently submitted for residential development. Consequently, any impact from this application on the neighbouring amenity of Streamside should be afforded very limited weight. There is some notional boundary hedging between the sites that does ensure some screening and enclosure between the two sites.

7.5.4 Oakside Cottage and Harpers House located on Harpers Road, and to the east of the application site, is separated from the applicant site by mature treed hedgerows, trees, and open paddocks/ fields. Due to the considerable mature landscape enclosure to Harpers House, impact from the application on this dwelling will be very limited.

7.5.5 It is recognised that Oakside Cottage, Harpers House, and the applicant site all take common access off Harpers Road from a single point of access and that this and vehicle movement will cause some noise impact on their residential amenity.

7.5.6 In review, the distance of separation is such that there would be no material loss of amenity to the surrounding occupants of these properties. It is considered that the application will have no to very limited impact 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; and, f) Odour, fumes, and dust.

7.5.7 Given the above, the application is deemed compliant with policy.

**(7.6) Private amenity of the proposed dwellings**

7.6.1 Policy H1(3) states that 'all new residential development must conform to the nationally described space standards as set out by the Ministry of Housing, Communities and Local Government (MHCLG)'. Policy D5 (Protection of amenity and provision of amenity space) is also applicable to this consideration.

**7.6.2 Table 5: Nationally Described Space Standards (NDSS)**  
(as evidenced Harpers Road, Ash – NDSS Compliance Schedule; January 2023)

House Type	Occupancy	GIA (min sqm std)	Proposed GIA (sqm)	GIA Comply Y/N	Built-in storage Comply Y/N
Fisher	1B2P	50	61.53	Y	Y
Piper	2B3P	70	70.40	Y	Y
Granger	2B3P	61	61.20	Y	Y
Butler	1B2P	58	60.00	Y	Y
Saddler	2B3P	70	70.70	Y	Y
Lardner	2B3P	70	84.16	Y	Y
Baker	2B4P	79	79.95	Y	Y
Fuller	3B4P	84	96.00	Y	Y
Mason	3B4P	84	96.89	Y	Y
Dexter	3B4P	84	111.18	Y	Y
Millwright	3B4P	84	124.32	Y	Y
Tillman	3B5P	93	93.82	Y	Y
Ploughwright	3B5P	93	93.82	Y	Y
Philosopher	4B5P	97	138.30	Y	Y
Weaver	4B5P	97	154.89	Y	Y
Cartographer	4B5P	97	100.39	Y	Y
Watchmaker	5B6P	110	174.68	Y	Y

7.6.3 All dwellings as evidenced comply with the NDSS in terms of GIA sqm; internal built-in storage, and adequate private amenity space, with most dwellings having front garden space and compliant rear gardens. While the apartments have relatively small areas of communal open space within their plots, the overall site have extensive open space immediately adjacent to the apartments for shared use.

7.6.4 Given the above, the application is deemed compliant with policy.

### **(7.7) Highway/parking**

7.7.1 The overriding requirement from national policy, is NPPF Paragraph 8 ‘Sustainable development’ which requires applications to ensure that they promote sustainable transport options.

7.7.2 NPPF Paragraph 110 *‘In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; b) safe and suitable access to the site can be achieved for all users; c) the design of streets, parking areas, other transport elements and the content of associated standards reflect current national guidance, including the National Design Guide and the National Model Design Code; and, d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree’.*

7.7.3 NPPF Chapter 9 Promoting sustainable transport: in this regard we refer to Paragraph 104(c) ‘opportunities to promote walking, cycling and public transport use are identified and pursued’, and Glossary **‘Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra-low and zero emission vehicles, car sharing and public transport’**. i.e. the transport assessment needs to review all forms of modal options accessible to and enabled by the application in order for the application to be viewed as achieving ‘sustainable development’.

7.7.4 Surrey Transport Plan (2022-2032) (LTP4): the Plan sets out four Objectives (zero emissions; support growth; well connected; well-being). The application broadly supports the Plan’s objectives.

7.7.5 Guildford Local Plan (2015-2034): the application accord with the Local Plan’s Policy ID3(1,2,4a,5,6,7,8 & 9) (Sustainable transport for new developments) which requires new development to contribute to the delivery of an integrated, accessible, and safe transport system, maximizing the use of sustainable transport modes. The applicant will be required to submit a Travel Plan Statement to promote sustainable means of movement; to be secured by Condition.

7.7.6 Policy A31: in terms of key transport-related requirements, the application accords and makes financial contributions to enable policy: ‘Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station’.

7.7.7 Policy ID10 (Parking Standards for New Development): the application references Policy ID10(2), namely: a) *The provision of residential car parking, for use by residents themselves, will not exceed the maximum standards set out in [Appendix B]Table B1;* b) *the provision of additional unallocated parking, to allow for visitors, deliveries, and servicing, at the ratio of 0.2 spaces per dwelling will only be required where 50% or more of the total number of spaces, provided for use by residents themselves, are allocated;* c) *the provision of non-residential car parking will not exceed the maximum standards set out in Table B2 [not applicable to this application];* d) *the provision of electric vehicle charging will provide at least the minimum requirements set out in the Building Regulations (Part S);* and, e) *the provision of cycle parking will provide at least the minimum requirements set out in Table B3.*

7.7.8 GBC Parking Standards for New Developments SPD (2023): the application accords with the on-and off-street car parking, cycle parking/storage, electric vehicle charging points for new development on strategic sites.

**Table 6: Parking Provision**

Description	Units	Vehicles		Bicycles	EV
		Policy	Compliant	Compliant	App.
1Bed (1s/unit)	5	5	Y	Y	1EV point/unit: Unit compliant
2Bed (apartment) (1s/unit)	5	5	Y	Y	
2Bed (unit) (1.5s/unit)	10	15	Y	Y	
3Bed (2s/unit)	20	40	Y		
4Bed (2.5s/unit)	10	25	Y	Y	
5Bed (2.5s/unit)	1	2.5	Y	Y	
Visitors (0.2/dwelling)		10.5	Y		
<b>TOTAL</b>	<b>51</b>	<b>103</b>			

**Note:**

- a. Garages, according to policy, are not include in the above parking provision unless they meet the minimum internal dimensions of 6x3m. 22No. garages provided.
- b. EV charging points (Building Regulations: one EVCP/ dwelling); specification to meet GBC Policy. Issue to be secured by Condition.
- c. Cycle storage (one space/ bedroom): Issue to be secured by Condition.
- d. SPD (2023) Designated accessibility parking bays (to accord with national guidance); car club bays and motorcycle parking provision not stated in policy and not evidenced in application.

7.7.9 Surrey County Council Highway Authority (CHA) have responded to the application and note that this planning application is duplicate planning application and hence comments should be read against both applications.

7.7.10 The CHA notes that the access into the applicant site take consideration of the two current dwelling's access as a shared access point off Harpers Road. Tracking has been provided which demonstrates that vehicles can enter and leave the site effectively. A trip rate analysis has been undertaken as part of the proposal and the development of 51 dwellings is likely to generate 27 and 25 two-way vehicle movements in the morning and evening peak hours respectively - this will equate to less than one vehicle movement every two minutes during the busiest periods of the day. With this relatively low number of vehicle trips and the separate implementation of the Ash Road Bridge (ARB), which should reduce the overall number of vehicles using Harpers Road to avoid the existing level crossing, the impact on the road network as assessed by the CHA is deemed to be not severe and acceptable.

7.7.11 The proposed access to Harper's Road will be provided with sufficient visibility, and vegetation should be regularly maintained at the site access to ensure maximum visibility splays are achievable at all times. Issue to be secured by Condition.

7.7.12 Harpers Road is a D-class road, the D67, and is subject to a 30mph speed limit. In accordance with Healthy Streets for Surrey, carriageways should be a minimum width of 4.1m for secondary streets. The available carriageway width, to function as a shared space if required, was deemed acceptable by the CHA.

7.7.13 In assessing Harpers Road traffic flows, the CHA stated that the 51 dwellings was likely to generate 27 and 25 two-way vehicle movements in the morning and evening peak hours respectively, equating to less than one vehicle movement every two minutes during the busiest periods of the day. As above, the implementation of the Ash Road Bridge (ARB) would reduce the overall number of vehicles using Harpers Road to avoid the existing level crossing, resulting in a redistribution of traffic on the local highway network. Consequently, the CHA noted that the impact of the new development on Harpers Road was not thought to be severe. Should the application gain approval, in the unlikely event that Harpers Road encounters issues in regards to traffic, the financial contribution sought by them would go towards mitigating any negative impacts, including potential improvements to the Guildford Road junction.

7.7.14 The CHA noted that the proposed development includes connections to the neighbouring Bellway site [Wildflower Meadows] and that pedestrians and cyclists would predominantly use this route to travel to/from the wider area. Given that there are no proposals to include a dedicated pedestrian/cycle route along Harpers Road, residents and visitors of the site would be expected to utilise internal connections. Should any users make use of the carriageway, as discussed in the point above, the width of the carriageway will encourage slower speeds. This internal network was purposefully supported by the CHA [Officer's Note: the submission by the Applicant of the 'Overarching walking and cycling plan' (dwg. ITB16016/ Fig. A1; nd. Submitted 31.03.2023) well illustrates the pedestrian and cycling network proposed by this application and how it ties into Wildflower Meadows to enable a broader network].

7.7.15 The SCC's Rights of Way team were consulted as part of the assessment of the planning application. They noted that, if required, the financial contribution would be used to go towards improvements to Public Footpath 356 to provide a better route and greater permeability to the local area.

7.7.16 The site is in proximity to Ash Railway Station, the pedestrian/cyclist connections provided within the site to the neighbouring land would provide higher permeability and offer a link direct to the station and other bus stops nearby. It is these routes that the CHA considers to be key, which would limit pedestrian and cyclists use of Harpers Road to travel north to those bus stops. The cycle voucher provision, as part of the S106 contributions, would further encourage sustainable travel to/from the site and this is in recognition of LTP4.

7.7.17 The highway improvement works as shown on Drawing No. ITB16016-GA-013 Rev C would improve driver conditions on Harpers Road and would require the developer to enter into a S278 Agreement with the CHA to undertake those works. Should any road edging need to be improved as part of those works, this would be included at the detailed design stage. The proposal to provide road safety improvements is deemed acceptable by the CHA.

7.7.18 It is noted that Policy A31(10) requires '*road layout or layouts to provide connection between ...the individual development site...in order to maximise accessibility and to help alleviate congestion on the A323 corridor*'. It is understood that due to individual site land issues and the requirements of the Ash Road Bridge (junction capacity on Ash Road Bridge into Wildflower Meadows), vehicle connection between individual development sites was not considered possible. The assessment by the CHA is based on the Ash Road Bridge (ARB) scheme being implemented which would reduce the overall number of vehicles using Harpers Road to avoid the existing level crossing and generating local congestion. The CHA has sought suitable financial contributions for the bridge and to enable pedestrian and cyclist connection between the individual development sites.

7.7.19 [Officer's Note: the above addresses response by SCC Highway to the objection letter submitted by Copperwood Developments (Bridge) Ltd which sets out four key points of objection, namely a) Carriageway width; b) Visibility at Harper's Road junction with Guildford Road (A323); c) Harper's Road traffic flows; and, d) Shared Surface nature].

7.7.20 The application's Stage One Road Safety Audit (October 2022; Rev.3)(see Transport Statement 4; pg.69) reviewed the proposed simple priority access off the western side of Harper's Road, Ash. Highway safety concerns as identified in the audit have been addressed by the application. Mitigation measures that are to be undertaken on public highways are subject to the SCC Highway Authority's approval. Issue addressed as part of a Section 184 Agreement.

7.7.21 The Applicant's Transport Statement (Dec 2022) notes that '*the proposal has been subject to pre-application and post submission discussions with both Guildford Borough Council and Surrey County Council, as the relevant Highway Authority. This has led to the scheme evolving to a point where, subject to an identified package of measures, SCC have no objection to the scheme progressing. The assessment, and subsequent 'no objection' from SCC has identified that:*

- a. *A safe and suitable vehicle access can be provided from Harpers Road, with additional pedestrian and cycle accesses which negate the need for pedestrians and cyclists to use Harpers Road. (Further, 'The proposal will bring forward pedestrian / cycle connections to the existing Public Right of Way network and the network of streets being delivered at Guildford Road).*



- b. *The site abuts existing / proposed residential areas and is allocated for residential uses. The site is well located to take advantage of the range of local services and facilities in the local area.*
- c. *The scheme ensures opportunities for sustainable travel are taken up through the delivery of a comprehensive Sustainable Transport Strategy (Section 7 Sustainable Mitigation Package (S7)) comprising:
 
  - i. *Delivery of pedestrian and cycle connections, which provide onward connections to the existing and future network of streets, paths, and Public Rights of Way, enhancing the ability to access day to day facilities and public transport infrastructure and reducing the need for existing and future residents to walk along Harpers Road (S7: Delivery of pedestrian and cycle connectivity to the adjacent Guildford Road site and Public Rights of Way network beyond).*
  - ii. *Delivering a traffic calming scheme on Harpers Road which would improve the environment for all users locally (S7: Traffic calming measures along Harpers Road as identified in Drawing No. ITB16016-GA-013A. These include: 30mph roundels along Harpers Road between Ash Green Road and the Guildford Road; a slight narrowing and surface treatments to Harpers Road in the vicinity of the exiting Public Right of Way to make this more prominent and improve pedestrian safety; and Signage at the Guildford Road junction warning of the potential for pedestrians to be 'in the road'.*
  - iii. *Provision of dedicated, secure cycle storage on the site.*
  - iv. *Provision of EV charging facilities on the development site.**A financial contribution (as agreed with SCC) towards improvements such as: improving existing PRow; improving the Ash Green / Harpers Road junction; and, local highway improvement schemes (S7: A highway and transport contribution secured through the S106, which could be used towards: improving Local Public Rights of Way (PRow); improvements at the Harpers Road / Ash Green Road junction; and, local highway improvement schemes in the vicinity of the site**
- d. *A contribution towards the New Bridge Road which will reduce queuing at the existing level crossing and remove rat running traffic locally.*
- e. *Implementation of a Residential Travel Plan to promote sustainable travel options, including walking, cycling, public transport and car sharing initiatives'.*
- f. *(pg2) Contributions will be sought towards ...improvements of the bridleway to the south.*
- g. *Measures to be confirmed with SCC Highways by applicant (TS Paragraph 4.6.2).*

[Officer's note: package of measures as set-out above, to be secured by Condition and S106 in consultation with SCC Highways].

7.7.22 The applicant has already confirmed that the estate roads and parking areas will be retained in private ownership but constructed to adoptable standards.

7.7.23 It is noted that following concerns raised by GBC Urban Design Officer regarding ensuring pedestrian and cyclist connectivity between the individual sites that make up the strategic allocation, the Applicant has made provision for these routes to connect into the Streamside application on the eastern boundary, and into the Wildflower Meadow scheme currently under construction. This commitment, to be secured by S106 Agreement, removes the concern raised.

7.7.24 In order to address issues raised by the local community regarding pedestrian and cyclist safety along Harpers Road; to address NPPF requirement to promote sustainable transport options; and, to address Policy A31 to ensure connectivity between individual development sites, the Applicant has submitted an 'Overarching walking and cycling plan' (Dwg. ITB16016/ Fig. A1; March 2023) to illustrate the pedestrian and cycling network to be delivered and/or make financial contributions to enable evidence of promoting sustainable travel options.

7.7.25 The above plan illustrates a series of site specific and surrounding networks, including improvements to the PRow that will enable relatively car-free and safe accessibility from the site towards Ash Station, Ash centre, bus stops along Guildford Road, and connection for ramblers along Footpath 356 PRow towards Guildford. Officers suggest that this plan addresses concerns raised and evidences that future residents of the scheme will be able to avail of sustainable travel options and is strongly supported. Measures as set-out to be secured by Condition in consultation with SCC Highways.

7.7.26 Increasingly it is recognized that to encourage modal shift requires a step-change at point of journey origin. To enable this, the application will provide (safe and dry) bicycle stores to all dwellings, making access to the bicycle easier, and offer cycle vouchers to each household. These measures promote convenience of cycling as a day-to-day modal option.

7.7.27 The application is supported by a Transport Assessment (TA) which has been assessed by the County Highway Authority (CHA). The TA shows that the existing junctions tested, currently operate within capacity with minimal queuing and will continue to do so in the future years, even with committed development, the proposed development and additional 'live' (but not committed) planning applications taken into account. The applicant's modelling has been reviewed by the CHA and no objections have been raised regarding the impact of this proposal on the capacity of the network subject to some improvements being made at junctions within the vicinity of the site and a series of mitigation measures to Harpers Road (traffic calming roundels) and the junction with Guildford Road to address highway issues relating to pedestrian and cycle movement along this Road (Ref. Dwg. ITB16016-GA-013). A S106 contribution has been secured to go towards these improvements. Given these measures, no highway safety objections have been raised by the County Highway Authority.

7.7.28 NPPF Paragraph 111 states that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'. SCC County Highway Authority, as statutory authority has no objection to the application.

7.7.29 In terms of parking policy, a total of 103 car parking spaces are provided on site, cycling storage sheds are provide, both in conformity to policy. The application provides garages (not counted in the parking calculation), on-driveway parking spaces, parking courtyards for the apartment buildings, and on-street parking for visitors. The application is deemed compliant with Policy ID10 (Parking standards for new development).

7.7.30 In terms of highways impact, it is concluded that the application does not result in any material increase in traffic in the area and no capacity concerns are raised. It is noted that this conclusion is reached taking into account all approved, committed and likely development in the immediate area. With the mitigation measures proposed, there would be no adverse impact on highway safety. As such, the proposal is deemed to be acceptable to the County Highway Authority and Council.

## **(7.8) Flooding and drainage**

7.8.1 The site is located within Flood Zone 1 as land assessed as having a less than 1 in 1,000 annual probability of river flooding (Environment Agency Mapping).

7.8.2 As part of the application's requirement, a Flood Risk Assessment (FRA; December 2022; Rev. B) has been submitted which has been supplemented with additional information requested by the Lead Local Flood Authority (LLFA). This is required to address Policy P4 (Flooding, flood risk and groundwater protection zones).

7.8.3 The Assessment notes that the site has insufficient infiltration rates, indicating that ground conditions would not support infiltration drainage methods. Further, it is acknowledged that Ash is known to be vulnerable to groundwater flooding. Maps submitted showing areas susceptible to groundwater flowing show that the north of the Site is situated in an area with potential for groundwater flooding of property situated below ground level, and the south of the Site is in an area with potential for groundwater flooding to occur at surface.

7.8.4 The EA flood map for surface water indicates that the majority of the site is at high risk of surface water flooding (probability >3.3%). To address this, the landscape proposals show extensive open space to act as flood compensation areas with most of the landscaping lying at 75.0m AOD and planted with suitable species to withstand regular flooding.

7.8.5 Pedestrian and cycle links, delivered as part of the broader network, will be raised above the predicted flood levels (to 75.9 AOD) to remain passable in all flood conditions.

7.8.6 The proposed foul water drainage, due to the topography of the site, will gravity-feed to an adoptable pumping station to the northeast of the Site. A rising main will then run south before running east into the entrance road for the Site and up Harpers Road.

7.8.7 The Applicant concludes that, in accordance with the requirements of Chapter 10 of the NPPF, the proposed development has been assessed for flood risk: consideration has been given to flood risks affecting the site, and also to flood risk elsewhere caused by the anticipated development. Based on their understanding of the site setting and the proposed development, it is considered that the proposed development can be constructed and operated safely and will not increase flood risk elsewhere.

7.8.8 The Environment Agency's mapping shows that the Site is located within Flood Zone 1 with a low probability of river flooding. The Environment Agency flood map for surface water indicates that the majority of the site is at high risk of surface water flooding. In conjunction with the flood mapping and storage strategy undertaken in relationship to the Ash Road Bridge proposals, and associate impact to the surrounding areas, the application sets aside the western portion of the site for flood mitigation, flood storage, and SUDs.

7.8.9 The applicant's strategy is that all road and roof runoff will drain into a series of SUD ponds located within the landscape areas to the western and northern parts of the site. The attenuation pond has been sized to store and release all surface water runoff from the proposed development at a rate as required to and including the 1 in 100-year plus 40% climate change event [Officer's Note: this would address Policy D15(3c)(4) – Climate change adaptation]. It is likely that the pond may contain some water through most of the year (apart from periods of prolonged low rainfall) due to the high-water table and nature of soils - this will provide a habitat for flora and fauna. The concern raised regarding water safety has been addressed by the application with defensive planting and natural surveillance from the dwellings.

7.8.10 To manage extreme storm events, to ensure residential and neighbouring safety, and to address possible flood storage capacity in relation to the Ash Road Bridge, the topographical profile of the site will be raised for the dwellings to direct surface water run-off away from proposed buildings and toward either landscaped areas, open attenuation, or the existing drainage ditches along the western and northern boundaries of the site. This will provide additional protection against surface water flooding during an exceedance event and will protect neighbouring properties from flooding.

7.8.11 Planning conditions have been recommended to ensure the 'principles' set as part of the application are followed through the detailed design and construction phase of the development. In addition, a verification report has been conditioned. This requires the Applicant to demonstrate that the surface water drainage system has been constructed as designed, with any minor amendments picked up. In addition, a new informative will also be added to the permission which states that 'as part of the submission of information to discharge the surface water drainage planning conditions the Applicant should provide pond liner details and depths in accordance with the manufacturer's recommendations, this should include evidence that a hydrogeologist has reviewed the pond liner design to take account of ground conditions.

7.8.12 The flood and drainage strategy and measures as tabled are acceptable to the LLFA (subject to the imposition of appropriate conditions). In this regard, the application is compliant with the relevant provisions of the NPPF and the Guildford Local Plan.

### **(7.9) Sustainable energy**

7.9.1 National planning policy requires policies and decisions to be in line with the Climate Change Act 2008 and NPPF Paragraph 152 which requires the planning system to '*shape places in ways that contribute to radical reductions in greenhouse gas emissions*'.

7.9.2 Guildford Local Plan Policy D2 (Climate change, sustainable design, construction, and energy) requires that (4) '*Proposals for major development are required to set out in a sustainability statement how they have incorporated adaptations for a changing climate...*' and, (9) '*New buildings must achieve a reasonable reduction in carbon emissions of at least 20 per cent measured against the relevant Target Emission Rate (TER) set out in the Building Regulations 2010 (as amended) (Part L).*' Further, the application should be read against Policy D14(1)(4) (Sustainable and low impact development). Requirements within Policy in some cases are required detailed construction resolution and are to be addressed as Conditions.

7.9.3 Climate Change, Sustainable Design, Construction and Energy SPD (2020): the SPD provides guidance for planning policy and sets out the requirements for energy statements and sustainability statements for major developments. The applicant's evidence is reviewed against these requirements

7.9.4 The application has submitted an Energy Statement (Dec 2022) to address current and emerging policy requirements. They note that the proposed development will be built under the next set of Building Regulations (Part L 2023). However, the assessment included within their report has been assessed to the current Part L 2013 Building Regulations, but has also been reviewed to the proposed carbon factors of the new SAP10.2.

7.9.5 The development will reduce regulated CO<sub>2</sub> emissions by integrating a range of passive design and energy efficiency measures throughout the dwellings. PV panels (minimum 47.18 kWp) will be integrated across all dwelling types, as indicatively illustrated on the dwelling type elevations (see 'Street Scene' dwgs submitted).

7.9.6 In designing to meet Policy D2 a house type specific approach has been adopted to ensure that all dwellings achieve a minimum 15% through the fabric improvements and an average of 17% across the scheme. Through specification and installation of the above measures a reduction in carbon dioxide emissions of over 20% compared to the Part L 2013 baseline will be achieved. Using the SAP 2012 carbon conversion factors, the site-wide improvement through fabric improvements is 18%, and with the introduction of PV the overall reduction in regulated CO<sub>2</sub> emissions is 39%

7.9.7 The application is read against the objectives of the Guildford Local Plan Policy D2 (Climate change, sustainable design, construction, and energy) and Policy D14 (Sustainable and low impact development). Policy D2(9) states that *'new buildings must achieve a reasonable reduction in carbon emissions of at least 20% measured against the relevant Target Emission Rate (TER) set out in the Building Regulations 2010 (as amended) (Part L). This should be achieved through the provision of appropriate renewable and low carbon energy technologies on site and/or in the locality of the development and improvements to the energy performance of the building'*.

7.9.8 The proposed specification for air permeability on all dwellings is 4.0 (a high level of energy efficiency). We note that, if the airtightness calculations is below 5.0, the Council requires applications to submit an Air Leakage Test Report that is to be produced for building control, to make sure the standard is being achieved. Issue to be addressed through the Building Regulations.

7.9.9 Fabric values (wall, door, and floor u-values) as tabled resulted in a carbon reduction through fabric measures of 18%. Dwelling Energy Efficiency Rates are 18.26%, this is better than the Target Energy efficiency rates required in policy. The application exceeds the Council's minimum requirements for fabric values.

7.9.10 The application has increased the number of Photovoltaics (PV) panels from 30.6KWp to 47.18KWp (102 to 125 panels) between the PreApp and submission scheme. The orientation of the PV panels are arranged to maximise sunlight capture. These are illustrated on the Streetscene image to show visual impact. The Council will require the submission of evidence of detailed solar calculations to make sure the standard is being achieved. Issue to be addressed by Condition.

7.9.11 The application evidences a strategy of 'fabric first' and compliance with the new Building Regulations which should achieve the 20% carbon reduction target in Policy D2(9) of the Guildford Local Plan. The application is consequently, as read, compliant with policy.

## **(7.10) Open space provision**

### **Planning policy**

7.10.1 As part of Chp8 'Promoting healthy and safe communities, NPPF Paragraph 92(c) requires applications to '*enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, ...walking and cycling*'; and, Paragraph 93(a) '*planning policies and decisions should...a) plan positively for the provision and use of open space*'. It is important to note that such open space is not defined solely as active sport areas such as sport fields, increasingly it is recognised that landscape spaces that accommodate informal play/leisure have both an educational, recreational, and well-being importance and should be encouraged.

7.10.2 Policy ID6 (Open space in new developments) requires that 'Development proposals that would result in a net increase in number of residential units are required to provide or fund open space based on the expected occupancy of the new development and the quantity standards set out in Table ID6a and ID6b. The cumulative requirement is 2.68ha/1,000 people. The occupancy rate is defined in Paragraph 6.19 relating to average occupancy rate for size of dwelling (taken as 5No. 1bed: 1.5p; 15No. 2bed: 2p; 20No. 3bed: 2.5p; 10No. 4bed: 4p; 1No. 5bed: 5p) circa. 132 people [Ref. interpreted Nomis 2011 QS413EW - Guildford]. The application would need to provide circa 0.35ha open space.

7.10.3 In the Planning Statement (December 2022), supported by the Landscape Masterplan (Dwg. 3017-APA-ZZ-GF-LA-L-1002 Rev. PO5), the application evidences the open space provision as a hierarchy of natural play (meadow grasslands, wetland meadows, wildlife ponds and grazing pastures); gravel footpaths, boardwalks, and dipping platforms; and pedestrian and cycle pathways that support the open space strategy.

7.10.4 The Statement notes (Paragraph 7.51) '*the proposed development includes an area of 1.48ha to the north and west of the proposed housing and a detailed landscape masterplan creates a dynamic multifunctional landscape setting within this open space to make it as usable as possible and encourage interaction and foster a connection of residents with the landscape and its ecology*'.

7.10.5 The area of open space to the west will be accessible for most of the year despite being part of the flood compensation area. It has been designed to provide a range of activities for all abilities and ages. The activity strategy focuses on playable landscape and exploratory features using more natural play areas within the areas of amenity green space, whilst interaction with nature and education of the key flora and fauna is also provided. This approach was agreed during pre-application discussions with the Council and is supported by Policy ID6.

7.10.6 Against Policy ID6 Table ID6a, the application evidences '*in quantitative terms, the open space provision amounts to 0.78ha of amenity greenspace and 0.05ha of children's play space thereby meeting the requirements of Policy ID6..., which would calculate at 0.13ha of amenity greenspace and 0.006ha of children's play space*'.

7.10.7 In terms of open space provision, a total area of approximately 0.35 hectares of land is required by policy. The applicant is providing 1.48ha of habitat meadows, informal open space landscape, and informal play opportunities which will form the main amenity space for residents.

7.10.8 While this provision is compliant with policy, there is some concern expressed that the provision for more structured play and related play areas for very young families and more active sport-orientated families is not provided. In terms of Policy ID6, the application site is not of a sufficient size to deliver 'Park and recreation grounds, including playing pitches' i.e. formal playing field space.

7.10.9 Consequently, to address these concerns, it is recommend that a) the Applicant provides some formalised play areas with play equipment within the landscape areas, preferably in closer proximity to the dwellings to promote natural surveillance; and b) the Applicant makes a financial contribution towards the provision or improvement of playing pitches in the vicinity of the site. This is deemed to be acceptable to mitigate the impacts of the development and will ensure that an appropriate facility is available for residents of the site to use.

7.10.10 It must be noted that the approach to create a more nuanced landscape that promotes habitat diversity, provides for alternative forms of outdoor activity that promotes active lifestyle and well-being across diverse age-groups and abilities, and takes a more informed approach to how developments provide a landscape and open space framework to respond to creating local biodiversity, is most welcome and strongly supported.

#### **(7.11) Impact on trees and vegetation**

7.11.1 The Guildford Local Plan Policy P6 (Protecting important habitats and species), and BS5837 (2012) 'Trees in relation to design, demolition and construction' sets out the requirement to address the impact of development on existing trees and treed hedgerows within or framing the site. In this regard we note the existing landscape has some distant value in terms of the setting to the Listed Building which will require address in design.

7.11.2 There are no Tree Preservation Orders protecting the trees or tree groups within the site. There are no Veteran Trees within the site.

7.11.3 There is a registered Ancient Woodlands (Natural England Ref. 17422 – Ancient and Semi-Natural Woodland) to the east of the site between the adjacent site open field and Harpers Road. As the site is further than 15m away from the Woodlands, the buffer zone requirement to protect such woodlands is not required.

7.11.4 The Applicant has submitted a Tree Survey and Impact Assessment (Ref. 1828-KC-XX-YTREE-TreeSurvey-and-ImpactAssessment; Dec 2022; Rev. C) and its Summary of Impact Assessments concludes that '*The proposed development results in the loss of very few trees, all of which are low quality and value*'.

7.11.5 It is considered that the Assessment complies with the objectives of policy; where applicable, recommendations and/or identified matters will be secured by Condition. Subject to conditions identified, the application is deemed to be compliant with NPPF Paragraph 180(c).

7.11.6 It is noted that the application conserves and enhances the treed landscape frame to the site, allowing for the management, succession, and biodiversity habitat enhancement of the existing landscape to be retained and augmented. The landscape strategy addresses the screening of the development from the distant setting of the Listed Building with the introduction of new tree and treed hedgerow planting. The considerable site area given over to landscape and approach is to be welcomed.

### **(7.12) Impact on ecology**

7.12.1 In terms of context, there are several designated ecological sites located in close proximity to the site, including <1km statutory designated Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) and the Thames Basin Heaths Special Protection Area (SPA); and <2km of the Ash to Brookwood Heaths SSSI located approximately 700 m to the north of the Site and the Basingstoke Canal SSSI located approximately 1.2 km to the northwest of the Site; Lakeside Park Local Nature Reserves (LNR); and, non-statutory designated Sites of Nature Conservation Interest (SNCI).

7.12.2 A Habitat Regulation Assessment Screening Note (May 2022) was undertaken to consider likely significant impacts arising from the delivery of the proposed Policy A31 strategic site allocation (then applicable to this application) on the Thames Basin Heaths Special Protection Area (TBHSPA) as a composite site as protected under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). Council correspondence notes agreement that this can be undertaken by a SANG land agreement. A specific SANG assessment has been prepared and submitted to Natural England, and see Thames Basin Heath SPA below.

7.12.3 Officers note that the Local Plan has been subject to a Habitat Regulations Assessment. This concluded that the development of this site, given it is allocated within said Local Plan, will not have a significant effect upon the Thursley, Ash, Pirbright & Chobham SAC. The closest SSSI, Ash to Brookwood Heaths, is also covered by the above-mentioned SAC designation, as such, for the same reasoning as provided above for the SAC, no significant impact on the SSSI from the proposed development is predicted.

7.12.4 The application contains various surveys, technical information, drawings, and reports which are submitted to address environmental/ habitat and technical policy requirements. The Preliminary Ecological Appraisal (May 2022) notes that the application's strategy is to establish the ecological value of this site and the presence/ likely-absence of notable and/or legally protected species in order to inform appropriate mitigation, compensation, and enhancement actions in light of proposed development works.

7.12.5 The surveys identify that the site, currently used as grazing and paddocks, is dominated by habitats of negligible to low ecological value. The loss of these habitats is therefore of low significance, whilst habitats of elevated value (namely treed hedgerows) are largely retained, aside from short sections to allow for site access. Faunal species are not considered to present any significant constraints to development of the site, although a number of mitigation measures are proposed, which will help to protect bats, Great Crested Newt (GCN), reptiles and small mammals, such as Hedgehog.



7.12.6 Further surveys may be required to identify activity levels of bats on site; establish presence/likely absence of bats in the buildings proposed for removal or that could be impacted by the proposed development and ascertain the presence/likely absence of GCN and reptiles. Details are provided within this report on the appropriate survey methodology. Issue to be addressed by Condition.

7.12.7 It is understood that the identified badger sett will not be impacted by the works and as such no further survey is recommended.

7.12.8 UK BAP Priority habitat exists on site in the form of hedgerow and broadleaved woodland. These habitats should be retained on site where possible and protected during the construction phase. Any priority habitat lost should be adequately compensated for through on-site landscaping and retained habitats should be enhanced where possible. The current landscaping proposals retain, protect, and enhance the majority of the more ecologically valuable habitat on site e.g. the hedgerows, ditch, woodland, and improved grassland areas not subject to grazing. Furthermore, new high value habitats are proposed to be created including wildflower grassland, wetland meadow, a new pond and native buffer planting; all to mitigate impact and are supported. Recommended ecological enhancements are specified within the Applicant's report, these enhancements target UK Biodiversity Action Plan (BAP) species/habitats, to help enhance the qualitative biodiversity value of the site post-development.

7.12.9 The enhancements suggested aim to create a net gain in biodiversity value on site (as to be evidenced using the Natural England Metric 3.1 Methodology) ensuring the application meets both national and local standards in planning and biodiversity. It is recommended that the ecological enhancement measures, as well as the maintenance and monitoring to ensure the long-term success of the enhancements, are detailed within a Construction Environmental Management Plan (CEMP) which is to be secured through condition.

7.12.10 The application's Phase 2 Ecology Surveys (Oct 2022) notes '*Upon successful implementation of all mitigation compensation and enhancement measures, the development proposals are considered to result in either neutral or positive residual impacts on each of the specified ecological receptors during both the construction and operational phase of the development, and proposals are considered to be in full compliance with legislation and policy surrounding the protection of protected species and green infrastructure*'. '*Mitigation measures based on the results above are stated within this report in Section 6. Greater detail of these actions should be provided in Environmental Management Plan (EMP), which should be made a condition of planning*'. To be detailed within a Construction Environmental Management Plan (CEMP).

7.12.11 Surveys: Great Crested Newt eDNA survey (May 2022): Applicant's conclusion was that the potential for GCN to use the site was considered negligible.

7.12.12 We note that applicable surveys and recommendations relating to badgers, bats, roosting birds, reptiles, invertebrates, and hedgehogs are addressed in the Preliminary Ecological Appraisal.

7.12.13 The Site is not subject to any existing landscape designations. UK BAP Priority habitat exists on site in the form of hedgerow and broadleaved woodland.

7.12.14 The application evidences Biodiversity Net Gain in their Biodiversity Impact Assessment (Nov 2022). The assessment aimed to quantify the predicted change in ecological value of the site in light of the proposed development to assess compliance against local and national planning policy. The proposed habitat creation includes 0.98ha of hardstanding, 0.84ha of native wildflower grassland, 0.11ha of wetland meadow, 0.58ha of amenity grassland, 0.12ha of mixed scrub buffer planting, 0.09ha of introduced shrub, 0.02ha of pond habitat; and, the planting of 70 new street and open space trees. Further, the application retains and enhances 0.64km of hedgerow to be retained along with 0.06ha of woodland and 0.55ha of modified grassland.

7.12.15 The proposals stand to result in a net gain of **6.38** biodiversity units associated with area-based habitats compared with pre-development value. This equivalent to a total net increase of **74.5%** in ecological value (the existing hedgerows will be retained on site, therefore the hedgerow units remain the same). This biodiversity uplift to the site is significant.

7.12.16 Detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and management to be provided within a Construction Ecological Management Plan (30 years) or as a separate report, secured through planning condition.

7.12.17 It is considered that the submitted evidence complies with the objectives of policy; where applicable, recommendations and/or identified matters will be secured by condition.

### **(7.13) Impact on air quality and noise**

7.13.1 The Guildford Local Plan Policy P6 (Protecting important habitats and species), P9 (Air quality), Policy D11 (Noise impacts), and Policy A31(12) inter alia sets out the requirement to address the impact of development on and from the surrounding context. In this regard we note the impact of the A31 and A331 in the vicinity of the site, and the impact of the railway line abutting the south boundary to the south.

7.13.2 The application's Air Quality Assessment (June 2022) describes the baseline air quality within the study area and considers the suitability of the site for the proposed development and the potential impact of the proposed development on local air quality during both the demolition, construction, and the operational phases.

7.13.3 The Assessments notes that taking into consideration the anticipated volumes of demolition and construction traffic, the maximum duration of the demolition and construction phase and the anticipated implementation of a CEMP, it is judged that the overall effect of emissions from development-generated traffic on existing sensitive human and ecological locations is likely to be 'not significant'.

7.13.4 The impact of local air quality on future residents at the proposed development site has been considered. Taking into consideration the proximity of the development site to nearby emission sources and baseline air quality conditions within the site and in the local area, it is anticipated that pollutant concentrations within the site will be well below the relevant objectives. As such, it is judged that new residents of the proposed development will experience good air quality and that the site is suitable for its proposed end-use.

7.13.5 The Assessment recommends a Dust Management Plan (DMP) should be submitted prior to works commencing on site. Issue to be secured by Condition (within CMP).

7.13.6 The application's Noise and Vibration Assessment (December 2022; Rev. B) reviews the properties along the southern boundary which will be near trains passing along the rail line adjacent to the site boundary. Façades facing the rail line will require upgraded glazing specification to control internal noise levels' (refer to Table 9: Required minimum attenuation values for glazing and Figure 13). Issue to be secured by Condition.

7.13.7 The Assessment found that, due to the elevated noise levels measured during train pass-by's along the southern boundary, property facades facing the rail line will require upgraded ventilation' (refer to Table 10: Required minimum attenuation values for ventilation and Figure 13). Issue to be secured by Condition.

7.13.8 Further, these dwellings require the provision of 2m high close boarded timber fences to the end rear gardens to mitigate noise from the rail line' (refer to Figure 14). Issue to be secured by Condition (with reference to BS8233).

7.13.9 A detailed Construction Noise and Vibration Management Plan is required that considers the impact of noise and vibration on nearby noise sensitive receivers. Issue to be secured by Condition within the CTMP (with reference to BS5228).

7.13.10 It is concluded that this assessment demonstrates that the site is suitable for residential development subject to the recommendations included in this report. It is considered that the Assessments complies with the objectives of policy; where applicable, recommendations and/or identified matters will be secured by Condition.

#### **(7.14) Thames Basin Heaths SPA**

7.14.1 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.

7.14.2 The proposed development is located within the 400 metre to five kilometre buffer of the SPA. As there are no Council owned SANGs in the catchment of the site, the applicant has indicated that they will secure SANG capacity in one of the SANGs which are operational in the Ash and Tongham area. This will provide the mitigation for the proposal. It is noted that a Grampian style condition is recommended which states that the housing development cannot be implemented until the SANG capacity identified for this application has been delivered, secured and is in operation. The applicant will also be responsible for paying the SAMM contribution and this will be secured through the legal agreement.

7.14.3 Given the Grampian condition, 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.

## **(7.15) Planning contributions and legal tests**

7.15.1 The three tests as set out in Regulation 122(2) require S106 agreements to be: (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and, (c) fairly and reasonably related in scale and kind to the development. If all other aspects of the application were deemed to be acceptable, then the following contributions could be secured by way of a S106 agreement.

7.15.2 Ash Road Bridge infrastructure: the application is required to make a financial contribution to Ash Road Bridge, infrastructure required to unlock the strategic allocation and re-direct pressures on the surrounding roads. On this basis, the contribution is directly related to the application to enable accessibility and mobility. These measures all help to mitigate the impact of the proposal on the surrounding highway network and are necessary, directly related to the development and reasonable and therefore meets the requirements of Regulation 122. Sum: £608,226

7.15.3 Affordable housing: the requirement for affordable housing has been set out above. The legal agreement would secure the provision of the number of affordable units, as well as their tenure and mix, so that the application is compliant with local and national policies. The obligation is necessary, directly related to the development and reasonable and therefore meets the requirements of Regulation 122.

7.15.4 SANG land: this is required as a combination of two avoidance and mitigation measures (SANG and SAMM) put in place to protect the Thames Basin Heaths from the impacts of new residential development. The Applicant has agreed to commit to a private SANG land agreement (This application falls within the catchment of Ash Green Meadows SANG and Manor Farm SANG, both of which may have capacity but to be concluded by Applicant and evidenced accordingly) to address this requirement from Natural England to protect and mitigate sensitive landscapes of importance.

7.15.5 SAMM Tariff: this tariff is required as a combination of two avoidance and mitigation measures (SANG and SAMM) put in place to protect the Thames Basin Heaths from the impacts of new residential development. The tariff is a requirement from Natural England to protect and mitigate sensitive landscapes of importance. Based on their Tariff Guidance, a contribution of has been agreed with the applicant. Sum: £47,988.23

7.15.6 Off-site Open Space Provision: while the application provides a range of on-site children's play space, the application will make use of surrounding facilities and put pressure on existing children's play spaces in the area. It is considered reasonable to require a contribution to mitigate this impact. Based on the play space tariffs set out in the Council's Planning Contributions SPD (amended April 2022), a contribution has been agreed with the applicant. Sum: £156,052.68

7.15.8 SCC Highways: the application and SCC have identified measures required towards highway safety improvements to address pedestrian and cyclist connections between the site and Ash Station. This requires improvements to the Public Right of Way footpath towards Ash Station. A contribution has been agreed with the applicant. Sum: £61,200

7.15.9 SCC Cycle voucher scheme at £100/dwelling. Sum: £5,100

7.15.10 SCC Travel Plan Statement monitoring contribution: £6,150

7.15.11 The S106 will include a requirement that the adjoining developments are given free and unfettered access to the application's estate roads (private) so that the accessibility requirements set out in the Strategic Development Framework SPD can be achieved.

These measures all help to mitigate the impact of the proposal on the surrounding highway network and are necessary, directly related to the development and reasonable and therefore meets the requirements of Regulation 122.

7.15.12 SCC Education: the application is likely to place additional pressure on school places in the area at early years, primary and secondary level. The application consequently makes financial contributions to address/ mitigate these impacts. Surrey County Council as the Education Authority provides a list of projects which contributions would be allocated to, and these are considered to be reasonable and directly related to the application. The total education contribution has been agreed with the applicant (28 November 2022). Sum: a) Early years contribution £48,341; b) Primary contribution £238,524; c) Secondary contribution £220,225: Total sum: £507,091

7.15.13 Surrey and Sussex Police: the proposal as a whole has the potential to increase pressures on existing policing resources in the area. Surrey Police note that the application site is currently a greenfield site which when built upon will create an additional demand upon the police service that does not currently exist. The police will need to recruit additional staff and officers and equip them. A contribution has been agreed with the applicant. As the contribution is required to mitigate the impacts of the development, the obligation is necessary, directly related to the development and reasonable and therefore meets the requirements of Regulation 122. Sum: £12,221.25

## **(8) FINAL BALANCING EXERCISE**

8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be taken in accordance with the development plan unless material considerations indicate otherwise. This requires a broad judgement regarding whether the development accords with the plan read as a whole. NPPF Paragraph 11 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'*. This is itself an important material consideration. The application forms part of allocated site A31 and is important for helping to deliver the housing identified in the Development Plan for this area. Overall, and taken as a whole, the proposal is considered to accord with the development plan. Therefore, the presumption is that the application should be approved without delay.

8.2 It is noted that the heritage harm identified above must be considered and balanced against the benefits of the proposal. NPPF Paragraph 202 requires a balance of the heritage harm against the public benefits of the scheme. That balance has been carried out, and the assessment concludes that the public benefits of the application outweigh the heritage harm identified, even taking account of the great weight and considerable importance afforded to the heritage harm.

8.3 However, identified harms resulting from the proposal must also be assessed, together with the heritage harm, and these should also be balanced against the benefits of the proposal. This final balancing exercise is set out below. In assessing the weight to be afforded to harms / benefits, officers have applied a scale which attributes **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.

8.4 The provision of 51 market and affordable dwellings (40%), in a mix which is deemed to be acceptable, is a sizeable contribution to the housing supply of the area against policy objectives; attribute - **significant weight**.

8.5 The application provides a very considerable habitat and landscape open space on the site which will be accessible to both existing and future residents of the area. The application delivers significant BNG habitat value to the site and contributes to a new landscape narrative for the broader A31 strategic allocation; attribute - **moderate weight**.

8.6 The application delivers on and off-site ecological conservation and enhancement. There would be the introduction of native tree and hedgerow planting, SUD landscapes and improvements to the stream, in total creating habitat diversity to the site not currently there; attribute - **moderate weight**.

8.7 The associated benefits including short-term employment to the construction industry; supporting Guildford and Ash's growth as a local employment, commercial and retail centre; and, further economic benefits from the spend of future occupants, which should be afforded **moderate weight** in favour of the application. Paragraph 81 of the NPPF suggests significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities generated by development.

8.8 While it is acknowledged that the contributions secured through this application are required to make the proposal acceptable in planning terms, they do nonetheless result in wider public benefits. The contributions will help to improve local facilities and will also assist in the delivery of the new road bridge to remove the level crossing at Ash station; attribute - **moderate weight**.

8.9 The application sets aside open space to address flood storage capacity to ensure residential amenity and safety; attribute - **significant weight**.

8.10 The application would help to improve pedestrian and cyclist accessibility and highway safety in the area by delivering a network of routes in conjunction with surround site. It is important to note that this issue was raised as concern by local residents and the Parish Council; attribute - **significant weight**.

8.11 The benefits of the application are wide ranging and long lasting. The harm resulting from the proposal is to the peripheral setting of the heritage assets, a factor which must be given great weight. However, as noted above, this is clearly outweighed by the public benefits of the proposal. Overall, it is considered that the benefits associated with the proposal do outweigh the identified harm.

## **(9) CONCLUSION**

9.1 It is considered that the application accords with planning policy and delivers against the objectives of NPPF Paragraph 8 'Sustainable development'. The site is an allocated site within the Guildford Local Plan as identified in Policy A31 'Land at the south and east of Ash and Tongham' and forms part of Policy S2 'Planning for the borough - our spatial development strategy' to inform the Guildford Local Plan as adopted. The collective Strategic Site is now designated as being part of the urban area of Ash and Tongham. Whilst there would be an inevitable change in the character and appearance of the area, the principle of development has already been found to be acceptable.

9.2 The application would contribute to the Council's objectives of delivering homes, enabling inward investment, and securing long-term environmental gains within the designated strategic site and surrounds as identified in the Local Plan.

9.3 While it is acknowledged that the proposal results in some harm to the peripheral setting of the listed buildings on the Ash Manor complex, the harm has been reduced through the provision of a landscaped buffer to the western boundary facing the heritage asset. Furthermore, the cumulative harm from other applications has to be considered. The harm has been identified as being at the lower end of less than substantial. An assessment has been carried out which concludes that, taking all relevant matters into account, the identified heritage harm is outweighed by the numerous public benefits which are generated by the proposal.

9.4 The application does not conflict with any policies that protect surrounding and/or environmentally sensitive areas (Thames Basin Heaths SPA et al), and proposes SANG mitigation in line with policy.

9.5 The application would provide a net gain of 51 residential units, which would be in accordance with housing delivery commitments in the Guildford Local Plan. This includes the provision of 40% affordable housing units, which are of a size and mix which is acceptable to the Council's Housing Officer. The proposed dwellings are considered to provide a good level of internal and external amenity for future residents, fully compliant with the NDSS. There would be no unacceptable harm to neighbouring residents. Subject to conditions, the scheme would also be acceptable in terms of highway safety, drainage, trees, ecology, archaeology, and sustainable construction.

9.6 Overall, the assessment concludes that the adverse impacts of the scheme would not significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework and the Guildford Local Plan taken as a whole. As such, the proposal is deemed to be compliant with the Development Plan and subject to the conditions and S106 agreement securing the contributions set out above, the application is deemed to be acceptable and is **recommended for approval**.