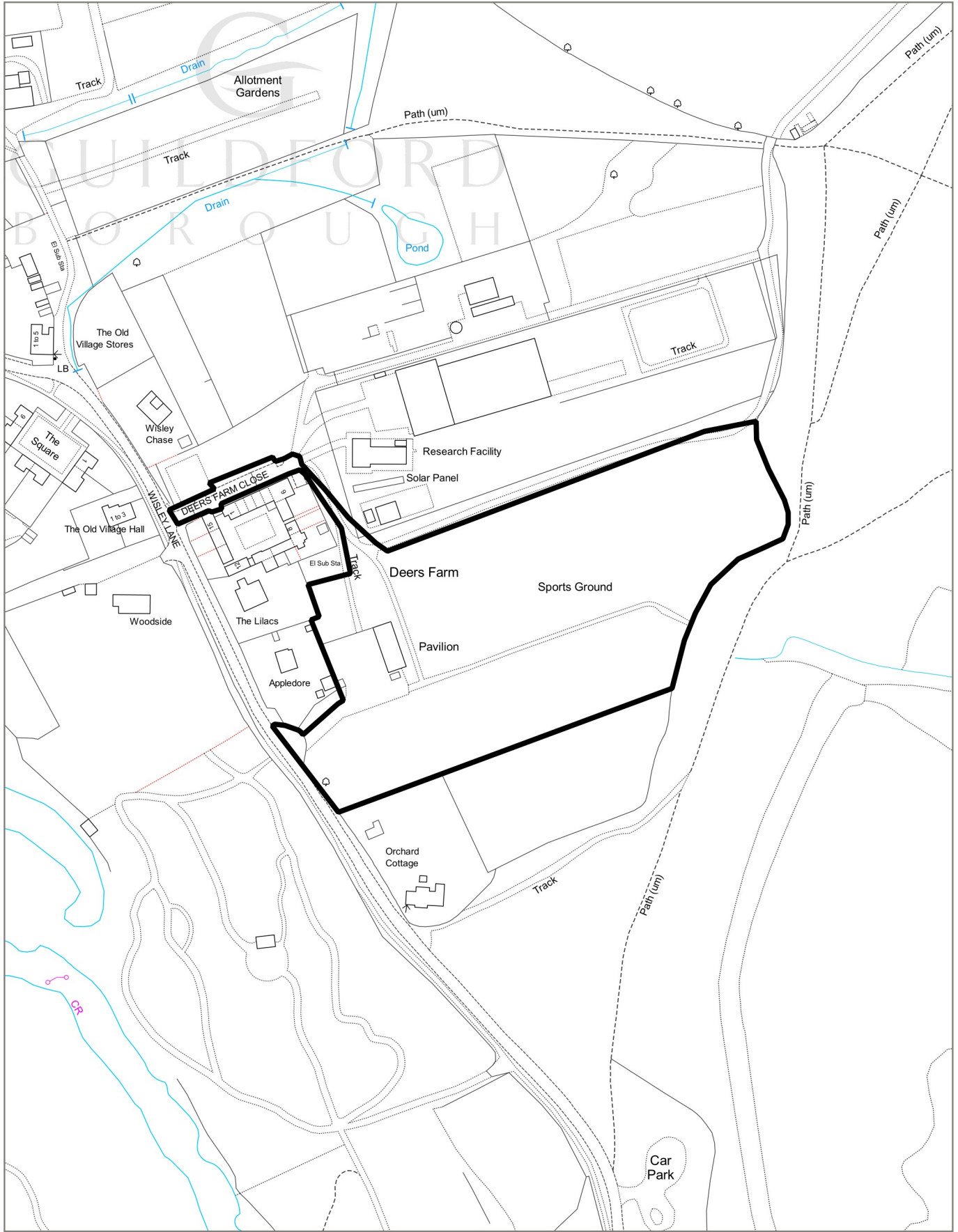


23/P/00219 - Car Park, Royal Horticultural Society Gardens, Wisley Lane



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Print Date: 07/07/2023

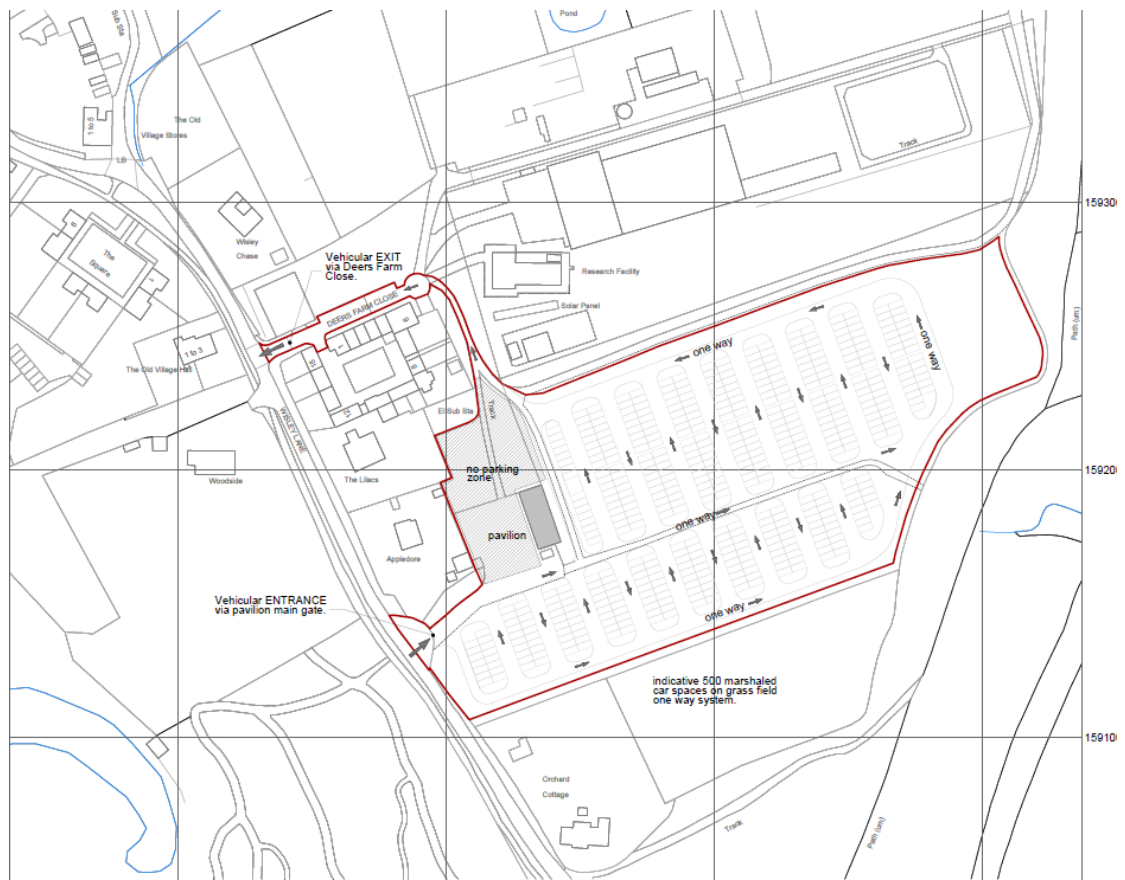


Not to Scale



GUILDFORD
BOROUGH

23/P/00219 - Car Park, Royal Horticultural Society Gardens, Wisley Lane, Wisley



Not to scale

App No: 23/P/00219
Appn Type: Full Application
Case Officer: James Amos

8 Wk Deadline: 23/06/2023

Parish: Wisley
Agent : Ms Everson
Planit Consulting
3 Innovation Place
Douglas Drive
Godalming
GU7 1JX

Ward:
Applicant: Mr Alexander
The Royal Horticultural Society
co/ agent
Planit Consulting
Godalming
GU7 1JX

Location: Car Park, Royal Horticultural Society Gardens, Wisley Lane, Wisley
Proposal: Use of land as an occasional overflow car park for up to 150 days per annum; use of former cricket pavilion for purposes ancillary to the use of the car park (description amended 08/06/2023).

Executive Summary

Reason for referral

This application has been called in to Planning Committee by Councillor Patrick Oven.

Key information

Planning permission is sought by RHS Wisley for the use of the land on the eastern side of Wisley Lane as an overflow car park for up to 150 days in any calendar year. The land is currently used for this purpose under the permitted development 'temporary' permission granted by the Town and Country General permitted Development Order 2015 (as amended) for up to 28 days per annum, although the RHS acknowledge that the 28 days has been exceeded in recent years. The car park is located to the north of the main RHS Wisley Gardens vehicular entrance with a pedestrian entrance off the public footpath into the gardens on the western side of Wisley Lane, located directly opposite Car Park 4's entrance. The placement of the car park in relation to the gardens means that visitors can directly access the gardens without having to walk along Wisley Lane back to the main entrance. The pedestrian access is only available on days when the overflow car park is in operation, thus limiting an all year-round use of this site entrance.

During the course of the application, the applicants have reduced the number of days for which the permission is sought from 200 days to 150. The site has the capacity to accommodate approximately 500 parked vehicles. A separate site entrance and site exit have been set up to allow for one way traffic routing through the site.

The site lies within the Green Belt and is also within the Thames Basin Heaths SPA 0-400m buffer zone. Land adjacent to the site is designated as the Ockham and Wisley Commons Site of Special Scientific Interest (SSSI) and the Ockham and Wisley Local Nature Reserve (LNR).

Summary of considerations and constraints

The proposal represents inappropriate development in the Green Belt, but it is considered that there are very special circumstances which would clearly outweigh the harm caused by reason of inappropriateness and the other harm identified.

No objections have been raised by the County Highway Authority although concerns have been raised over the overall sustainability of the project. The applicants have provided further information on the need for the overflow car park at particularly busy periods and have agreed to provide some of the spaces with electric vehicle charging points. They are also proposing that the existing cricket pavilion be used as a welfare building for staff working at the car park and for storage of equipment used at the car park.

The use of the former cricket pavilion as a welfare facility for RHS staff at the car park and on the main site is considered acceptable and would not represent inappropriate development in the Green Belt.

It is not considered that the level of use proposed would be at a level where significant adverse impacts will be caused to the occupiers of nearby residential properties. The parking is located away from the road frontage to the south and east of the cricket pavilion, away from boundaries with the nearest residential properties. It is considered that the use of the car park for up to 150 days per annum would not result in a significant harmful impact on neighbouring residential occupiers in terms of noise or general disturbance.

Subject to conditions, it is recommended that planning permission be granted.

RECOMMENDATION:

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

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

A.001 – Site Location Plan received on 08/02/2023

A.002 – Block Plan and Parking Layout received on 08/02/2023

A.003 – Existing and proposed floor plans received on 08/02/2023

A.004 – Existing elevations received on 08/02/2023

A.005 – Proposed elevations received on 08/02/2023

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

2. Within 1 month of the date of this permission, visibility zones shall be provided in accordance with the approved plans and thereafter the visibility zones shall be kept permanently clear of any obstruction over 0.6m high.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

3. Within 1 month of the date of this permission, pedestrian warning signs shall be provided in accordance with the approved plans and thereafter shall be maintained for their designated purpose.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

4. Within 2 months of the date of this permission, a scheme for the provision of footways with tactile paving to be provided at both access points to the car park shall be submitted to and approved in writing by the Local Planning Authority, and the approved footways with tactile paving shall be provided in accordance with the approved details within 2 months of the date of the approval of details, and thereafter maintained on the site.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

5. Within 1 month of the date of this permission, a scheme shall be submitted to the local planning authority to show that 5 of the proposed parking spaces shall be 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) with a further 10 spaces provided with cabling for the future provision of charging points. The approved scheme shall be installed on the site within 2 months of the date of the approval of the scheme and shall be maintained as such thereafter.

Reason: In order to promote sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework 2021.

6. The car park hereby permitted shall only be used for up 150 days in any calendar year.

Reason: To accord with the terms of the application.

7. Within one month of the start of a new year, a report shall be submitted to the Council setting out the number of days that the car park has been used in the preceding calendar year.

Reason: To accord with the terms of the application and to ensure that the limit on the use of the car park is not exceeded.

8. The development hereby approved shall be carried out in accordance with the mitigation measures detailed in the Preliminary Ecological Appraisal and Bat Scoping Assessment (dated November 2022 by the Ecology Co-op) in accordance with a timetable to be submitted for approval by the Council within 1 month of the date of this permission.

Reason: To mitigate against the loss of existing biodiversity and nature habitats.

Informatives:

This statement is provided in accordance with Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Guildford Borough Council seek to take a positive and proactive approach to development proposals. We work with applicants in a positive and proactive manner by:

- Offering a pre application advice service in certain circumstances
- Where pre-application advice has been sought and that advice has been followed, we will advise applicants/agents of any further issues arising during the course of the application
- Where possible officers will seek minor amendments to overcome issues identified at an early stage in the application process

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

In this case pre-application advice was sought and provided which addressed initial issues, the application has been submitted in accordance with that advice, however, further issues were identified during the consultation stage of the application. Officers have worked with the applicant to overcome these issues.

Officer's Report

Site description.

The application site comprises an area of open land which is currently used by RHS Wisley as overflow visitor parking to serve RHS Wisley Gardens. The site consists of 2.28 hectares of land located on the eastern side of Wisley Lane. The site was formerly used as a sports ground, although the last use of the site as a sports ground was in excess of 12 years' ago. The site is predominantly laid to grass and includes a former cricket pavilion building and areas of hardstanding at its southwestern end close to the site frontage.

Parking at the site has previously been undertaken in line with Permitted Development (PD) rights, i.e. for 28 days per annum. RHS Wisley have stated that an increase in visitor demand in recent years has resulted in the need to utilise Car Park 4 beyond the 28-day limit set out within the General Permitted Development Order (GPDO) under Schedule 2, Part 4, Class B. They state that over the past 5 years, the number of days where the car park has been required has exceeded this allowance up to 100 times per annum This application therefore seeks permission to use the land for up to 150 days per year as an overflow car park when the main garden car parks 1-3 reach capacity, to meet the increase in visitor numbers. The site has a capacity for up to 500 cars to be parked. There are no proposals to introduce formalised parking bays onto the site and no new hard surfaces will be provided within the site.

Following discussions between the Council and the applicants, the applicants have agreed to reduce the number of days for which permission is sought for the use of the car park from 200 days to 150 days per annum.

A one-way entry and exit system has been implemented with cars entering the site from the main entrance point and leaving via Dears Farm Close. Marshals are provided on days when the overflow car park is in operation.

It is also proposed to use the existing cricket pavilion as a welfare facility for RHS parking and grounds staff and for storage of car park related equipment.

The car park is located to the north of the main RHS Wisley Gardens vehicular entrance with a pedestrian entrance off the public footpath into the gardens on the western side of Wisley Lane, located directly opposite Car Park 4's entrance. The placement of the car park in relation to the gardens means that visitors can directly access the gardens without having to walk along Wisley Lane back to the main entrance. The pedestrian access is only available on days when the overflow car park is in operation, thus limiting an all year-round use of this site entrance.

The site lies within the Green Belt and is also within the Thames Basin Heaths SPA 0-400m buffer zone. Land adjacent to the site is designated as the Ockham and Wisley Commons Site of Special Scientific Interest (SSSI) and the Ockham and Wisley Local Nature Reserve (LNR).

Proposal.

Use of land as an occasional overflow car park for up to 150 days per annum; use of former cricket pavilion for purposes ancillary to the use of the car park (description amended 08/06/2023).

Relevant planning history.

Reference:	Description:	Decision Summary:	Appeal:
22/P/00951	Variation of condition 6 of planning application 19/P/01100 approved 13/09/2019 to alter the required width of path from 3m to 2m.	Pending	N/A
20/P/01570	Variation of condition 16 of planning application 19/P/00377 approved 21/05/19 to allow the AHU and condensers to be placed externally on the roof (retrospective)	Approve approved 17/12/2020	N/A
19/P/01100	Variation of condition 8 (parking) re: 16/P/01080 approved 30/09/16 to 13/09/2019 amend the approved car park layout.	Approve	N/A
19/P/00377	Variation of condition 17 of 16/P/00976, approved to allow alterations to the scheme and substitution of drawings numbers.	Approve	N/A

17/P/02375	Application under Section 19 of the Approve Planning (Listed Building and Conservation Area) Act 1990 to vary the wording of pre-commencement conditions 2, 3, 4, 5 and 6 of Listed Building Consent 16/P/01081, approved on 30/09/2016.	26/04/2018 N/A
16/P/01081	Listed building consent for the erection of new part single-storey part two-storey building accommodating retail, entrance and visitor facilities and alterations to the car parking and hard and soft landscaping with associated alterations to the Laboratory building including the demolition of the existing extensions and alterations to the fenestration, demolition of Aberconway Cottage and part of Aberconway House.	30/09/2016 N/A
16/P/01080	Erection of new part single-storey part two-storey building accommodating retail, entrance and visitor facilities and alterations to the car parking and hard and soft landscaping and following the demolition of the existing plant centre, the extensions to the Laboratory building, toilet blocks, Aberconway Cottage and part of Aberconway House.	30/09/2016 N/A

Consultations.

County Highway Authority - (Revised comments) The proposed development has been considered by the County Highway Authority who having assessed the application on safety, capacity and policy grounds, recommends that conditions be imposed in any permission granted requiring the provision of visibility zones at the site exist, that pedestrian warning signs be provided, that footways with tactile paving be provided at both access points to the car park and that at least 5 spaces be provided with electric vehicle charging points, and a further 10 be provided with cabling for future provision of charging points.

The proposal will lead to the site being used as an overflow car park for an increased number of days per year, rising from 28 days to 200 days. During its use, the car park will have car parking marshals present to ensure the parking areas and one-way system is adhered to. Visibility will be provided in accordance with speed survey results. Condition 3 will provide a safer route for pedestrians to/from the site.

Surrey County Council, Historic Environment Planning: Archaeology – The application site is over the 0.4 hectares threshold which is recommended for archaeological assessment and possibly evaluation under the guidelines set out in policy HE11 in the Guildford Borough Council local plan. However, the proposals do not involve any ground disturbance and so I have no archaeological concerns in this case.

The Gardens Trust - We have considered the information provided in support of the application and liaised with our colleagues in the Surrey Gardens Trust whose local knowledge informs this joint response. On the basis of this we confirm we do not wish to comment on the proposals at this stage. We would however emphasise that this does not in any way signify either our approval or disapproval of the proposals.

Surrey Wildlife Trust – The Preliminary Ecological Appraisal and Bat Scoping Assessment appears to be suitable to support the planning application. We would advise that if granted, the Applicant follows the advice of The Ecology Co-Op. Please note that if artificial lighting is proposed as part of the design, then we would advise that The Ecology Co-op assess whether this could adversely impact upon the Thames Basin Heaths SPA, Ockham and Wisley Common SSSI and Ockham and Wisley LNR. This assessment would need to be carried out prior to determination, however, current proposals on the planning portal show no plans for artificial lighting.

Surrey CPRE object to the application. The cricket pitch is in the Green Belt, and close to the centre of the village of Wisley. One of the purposes of the Green Belt policy is to assist in safeguarding the countryside from encroachment. Turning this part of the Green Belt into a car park, with all the increase in traffic, noise and disturbance is clearly inappropriate and conflicts with paragraph 147 and 148 of the National Planning Policy Framework. It will encourage more traffic on very small roads that are already insufficient for the local traffic. RHS has been using this sports field as a car park in excess of the 28 days it has been permitted to do so. The area is designated in the Lovelace Neighbourhood Plan as a Local Green Space. An alternative, such as offsite parking with shuttle buses should be sought

Parish Councils

Ockham Parish Council:

Ockham Parish Council are aware that there is significant concern, particularly from residents of Wisley village, about the substantial number of visitors to the RHS. The visitors all use Wisley Lane to access the RHS and peak period high visitor numbers lead to a large volume of vehicles entering Wisley village itself.

As the land identified as Car Park 4 lies within the Green Belt and is adjacent to the TBHSPA, we are keen to ensure that this field is retained as an area of natural green space. It should not be marked with parking spaces and there should be no additional concreting/tarmac.

The traffic survey carried out for this application was during November 2022. The traffic data provided should be fully reflective of the high volume of vehicles visiting the RHS on the days that this field is used for car parking. We have not seen the traffic model produced for 22/P/01175 but GBC Planning should be able to satisfy themselves that specific data reflecting the RHS traffic movements has been incorporated into the Taylor Wimpey traffic model for FWA. All traffic numbers should demonstrate that a) the cumulative impact of traffic using the new Wisley Lane is considered on the LRN and in particular, Ockham Park roundabout and b) if application 22/P/01175 is approved, the cumulative impact of traffic from both the RHS and FWA (the latter during the construction, operational and fully completed operational stages) is considered on the LRN and in particular, Ockham Park roundabout.

The RHS have acknowledged that they are already exceeding the agreed number of parking days in this location. This application would formalise their existing arrangement but should be adhered to and not used at any time over any newly approved arrangement.

Ripley Parish Council:

Objects. The RHS and residents of Wisley would be better served by an off-site parking area and increased public transport or shuttle bus provision.

Third party comments:

15 letters of representation have been received raising the following objections and concerns:

- Increase in traffic along Wisley Lane causing serious congestion and obstruction
- Wisley lane is not suitable for the increase in traffic
- The additional traffic causes a danger to pedestrians and cyclists on the highway
- The RHS routinely causes obstruction and long traffic queues on Wisley Lane.
- The unlawful use of the car park is the cause.
- Lack of detail on the number of parking spaces proposed
- The form states that the site can accommodate 500 spaces. In reality, up to 1000 cars could be accommodated
- Traffic survey is inaccurate and should be ignored
- Difficult to enforce the number of days on which the overflow parking would be used
- Increased traffic and pedestrians lead to more litter and unauthorised parking within the village
- Purpose of the car park is to get more visitors to the RHS Wisley Gardens
- The use of the overflow car park has exceeded the 28-day permitted development limit since it opened in 2016. The unlawful use should have been enforced against at that time
- On busy days, the marshalling of cars and pedestrians at the crossing point causes long queues to build up in both directions
- The additional use of the site for parking is out of character with the village
- Loss of the sports facilities
- The land is designated as Local Green Space in the Lovelace Neighbourhood Plan
- The use of the overflow car park results in significant delays on local roads
- The proposals do nothing to encourage sustainable travel but will only encourage more car use
- The increased traffic will cause a health and safety risk to cyclists and pedestrians.
- The proposals are inappropriate development in the green belt and no very special circumstances have been shown
- The proposals will damage the surface of the site and in wet weather will lead to the deposit of mud on the road
- No assessment has been made of the impact of the proposals on trees adjacent to the site.
- The change of use of the pavilion should not be permitted
- Other land in the village is also used for parking and if approved, this application will open the door for other proposals to come forward.
- Significant disruption to local residents in Deer Farm Close
- Impact on the area from the gate to the gardens

The objectors have also questioned whether a site notice was displayed at the site. The Council's records (including a photograph) show that a site notice was displayed at the site from 30th March 2023. A second site notice was put up on 12th June 2023.

Pyrford Community Forum object to the application and raise concerns with regards to the increase in traffic along Wisley Lane and Lock Lane to Pyrford Road.

Planning policies.

National Planning Policy Framework (NPPF):

Chapter 2: Achieving sustainable development
Chapter 9: Promoting sustainable transport.
Chapter 12: Achieving well-designed places.
Chapter 13: Protecting Green belt land
Chapter 15: Conserving and enhancing the natural environment.

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

Policy S1: Presumption in favour of sustainable development
Policy P2: Green Belt
Policy P5: Thames Basin Heaths SPA
Policy E5 - Rural economy
Policy E6 - The leisure and visitor experience
Policy D1 - Place shaping
Policy D2: Climate Change, sustainable design, construction and energy
Policy ID3: Sustainable transport for new developments

Guildford Borough Local Plan Development Management Policies 2023

Guildford's Local Plan Development Management Policies (LPDMP) was adopted by the Council on 22 March 2023. This now forms part of the statutory development plan, and the policies are given full weight.

Policy P7: Biodiversity in New Developments
Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Policy D5: Protection of Amenity and Provision of Amenity Space
Policy ID10: Parking Standards for New Development

Lovelace Neighbourhood Plan

Policy LNPEN2: Biodiversity and Natural Habitats
Policy LNPEN4: Light Pollution
Policy LNPEN5: Air Quality and Traffic
Policy LNPI4: Parking

Supplementary planning documents:

Climate change, sustainable design, construction and energy SPD, 2020.
Parking Standards for New Development SPD (2023)

Planning considerations.

The main planning considerations in this case are:

- the principle of development and Green Belt Issues
- the impact on the character of the area
- the impact on neighbouring amenity
- highway/parking considerations
- Bio-diversity Issues
- Other Issues
- Very Special circumstances

The principle of development and Green Belt issues

Chapter 13 of the NPPF sets out Government policy on the development of land within Green Belts. Para. 137 states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Para. 147 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances, whilst para. 148 states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Guildford Borough LPSS Policy P2 states that the Metropolitan Green Belt, as designated on the Policies Map, will continue to be protected against inappropriate development in accordance with the NPPF. Inappropriate development will not be permitted unless very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm is clearly outweighed by other considerations. Part 2 of the policy states that the construction of new buildings in the Green Belt will constitute inappropriate development, unless the buildings fall within the list of exceptions identified by the NPPF.

The use of land for the parking of cars is normally considered to constitute inappropriate development within the Green Belt. Although the change of use of land is one of the exceptions identified, the parking of cars on the land would not preserve the openness of the land and may conflict with one or more of the purposes of including land within it. Matters relating to openness are a matter of planning judgement. Openness has both spatial and visual aspects.

In this case, the use of the site is proposed for the parking of up to 500 cars for up to 150 days per year. This would represent a significant amount of time that the land would be occupied for parking and by a large number of vehicles. The use may be temporary in nature and limited in extent, but nevertheless, for the period of time that the car park is and would be in use the openness of the land would not be preserved. The impact on visual openness would be significant and would represent a significant change to the visual appearance of the site.

Paragraph 138 of the NPPF lists the five purposes of the Green Belt, namely:

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

The site is located to the south of the main built-up area of Wisley Village and is bordered by woodland to the east. It is considered that the site serves one of the purposes of including land in the Green Belt by safeguarding the countryside from encroachment.

With regards to the use of the existing cricket pavilion as a welfare facility for staff employed at the car park and at RHS Wisley, and for storage purposes for equipment associated with the car park use, this part of the proposals would represent the re-use of building which is of a permanent and substantial construction and in accordance with NPPF para 150(d) would not constitute inappropriate development. However, the use of the land for car parking for up to 150 days per annum would constitute inappropriate development in the Green Belt. Substantial weight is given to this harm.

In such circumstances, it would be necessary to consider whether there are any very special circumstances which would clearly outweigh the harm that is caused by reason of inappropriateness and any other harm identified. This report therefore goes on to consider whether any other harm is caused by the proposed development before making an assessment of whether there are any very special circumstances.

The impact on the character of the area

Policy D1 of the LPSS requires all new developments to achieve high quality design that responds to the distinctive local character (including landscape character) of the area in which it is set. The policy also requires development to be designed to reflect the distinct local character of the area and reinforce locally distinct patterns of development, including landscape setting. Policy D4 of the LPDMP reinforces this but also promotes the use of innovative design approaches, including use of materials and construction techniques where this presents an opportunity to create new or complementary identities that contributes to and enhances local character.

As noted above, it is proposed to make use of the application site for car parking for up to 150 days per annum. It is not proposed to add any hardstanding or permanently marked out parking spaces to the site, but when it is in use, a number of movable structures such as bollards and temporary fencing would be installed to direct cars to their parking place and to manage vehicle flows through the site. The use of the car park would therefore be of a non-permanent and temporary nature which would only impact on the visual amenities of the site when it is use. At other times, the site would remain as an open field. In this regard, it is not considered that the proposals would have a significant impact on the overall character of the site and surrounding area for the majority of the time. If the use was to cease, the application site would be returned to its grassed open nature.

No external changes are proposed to the cricket pavilion elevations and its existing character would be maintained.

The impact on neighbouring amenity

LPSS Policy H4 states that permission will be granted provided that development does not have an unacceptable effect on amenity. LPDMP Policy D5 states that development proposals are required to avoid having an unacceptable impact on the living environment of existing residential properties or resulting in unacceptable living conditions for new residential properties, in terms of privacy and overlooking, visual dominance and overbearing effects of a development, access to sunlight and daylight, artificial lighting, noise and vibration and odour, fumes and dust.

The formalisation of the parking in the site for up to 150 days per annum will result in an increase in activity on the site which could impact on the amenities of nearby residents whilst the parking is taking place. Additional traffic in the village will also have an impact on the general level of amenity in the village.

The applicants, in their supporting statement, note that the level of use of the overflow car park would vary on each occasion the car park is brought into use, and would often be below the available capacity. In general terms, it is not considered that the level of use proposed would be at a level where significant adverse impacts would be caused to the occupiers of nearby residential properties. The applicants have also emphasised that the parking is located away from the road frontage to the south and east of the cricket pavilion, away from boundaries with the nearest residential properties.

On occasions, the applicants also state that when busy evening events at RHS Wisley necessitate the use of the overflow car park, temporary event safety lighting will be used. All vehicles will be required to exit the car park once the event has finished and the gardens are closed and that once all vehicles have vacated the car park, all lighting on the site will be switched off.

In light of these comments, it is considered that the use of the car park for up to 150 days per annum would not result in a significant harmful impact on neighbouring residential occupiers, and the proposal therefore complies with Local Plan Policies H4 and D5

Highways and Parking Issues

Policy ID3 of the LPSS requires new development to contribute to the delivery of an integrated, accessible and safe transport system and maximise the use of sustainable transport modes including walking, cycling and the use of public and community transport.

The application is supported by a Transport Statement which makes the following summarised points.

- During the time that the site has been used as a temporary car park for 'up to' 28 days per year under permitted development rights, there have been no recorded injury accidents associated with the two vehicular accesses to the site or associated with the pedestrian access to RHS Garden Wisley (or pedestrian crossing movements between the site and RHS Garden Wisley). Given this it is apparent that the use of the site for overflow car parking has not resulted in any apparent pattern or incidence of injury accidents.
- Vehicular access and egress to the site has been controlled through traffic management and marshalling, which has been developed and refined over the years that the site has been used as an overflow car park.
- Access and egress to the site is gained via a one-way system, where access to the site (Car Park 4) is gained from Wisley Lane via the 'main' access. Departing vehicles are required to exit/egress via the Deers Farm Close access.
- The proposed access has been designed with appropriate geometry and visibility splays, all in accordance with the requirements set out within MfS and MfS2. It is considered that the one-way arrangement minimises disturbance within Wisley Lane and enables vehicles to safely enter and exit the site without prejudicing the free flow of traffic or condition of road safety within the adjoining public highway.
- The planning application seeks no increase in traffic attracting development at RHS Garden Wisley. As such the development proposals seek to provide appropriate car parking facilities to accommodate existing parking demands that arise as a result of the continued success of RHS Garden Wisley.
- There is no anticipated increase in traffic attraction to RHS Garden Wisley as a result of the development proposals. Nor is there any anticipated change to peak traffic flows within Wisley Lane as the use of the site for car parking simply redistributes traffic from RHS Garden Wisley (which is also accessed from Wisley Lane) to Car Park 4.

The Transport Statement concludes by stating that the development proposals will not result in any material (negative) transport impacts in respect to the operation of the site access or the wider highway network and that the proposals can be satisfactorily accommodated and will not prejudice the free flow of traffic or condition of road safety within the neighbouring highway

The proposed development has been considered by the County Highway Authority who having assessed the application on safety, capacity and policy grounds, recommends that conditions be imposed in any permission granted requiring that visibility zones shall be provided in accordance with the approved plans and thereafter kept permanently clear of any obstruction over 0.6m high, that pedestrian warning signs be provided in accordance with the approved plans and thereafter maintained, that tactile paving shall be provided at both access points to the car park shall be provided and that space shall be provided within the site in general accordance with the approved plans for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. The County Council also, in their original comments asked for at least 20% of all available spaces shall be provided with a fast-charge electric vehicle charging point with a further 20% of spaces provided with cabling for the future provision of charging points.

In an exchange of correspondence between the applicants and Surrey County Council, the applicants made the point that the use of the site was as an overflow car park and that in general terms the site remains low key rural in nature, almost field like and is really only to be used around pinch point days. They also pointed out the measures being taken by the RHS Wisley at their main site with regards to sustainable transport measures including electric vehicle charging and considered that the condition proposed was overly onerous and disproportionate for the use proposed.

In response, the County Highway Authority have stated that the latest guidance puts more emphasis on EV charging point provision. Rising from 20% of all spaces for commercial uses, with a further 20% of spaces to be provided with cabling, to 50% of all spaces to be provided with EV charging points. This is in recognition of LTP4 and the need to provide sustainable modes of travel to/from a site. They note that the proposal will increase the annual use of the car park, rising to a use of 150 days per annum. Surrey CC state that they must ensure that this additional use throughout the year provides drivers with sustainable modes of travel to/from the site, but in an acknowledgement of the specific circumstances of this case accept that this proposal can be based on a site specific assessment. As such, the County Highway Authority would accept a minimum of 5 spaces be provided with a fast-charge EV charging point, with a further 10 provided with cabling for the future provision of charging points.

With regards to the wider sustainable transport implications of the proposals, it should be noted that Guildford Borough Local Plan Strategy & Sites Policy ID3 states as follows:

- *New development will be required to contribute to the delivery of an integrated, accessible and safe transport system, maximising the use of the sustainable transport modes of walking, cycling and the use of public and community transport.*

Given that the proposed development is for an overflow car park to be used for 150 days per annum, the development proposal contributes very little to the ambitions contained in para (1). However, it is noted that the County Highway Authority have recommended a condition for tactile paving and footway improvements in the immediate vicinity of the car park access points, which will improve pedestrian facilities in the immediate vicinity of the site.

Guildford Borough Local Plan DMP Policy ID9 relates to Achieving a Comprehensive Guildford Borough Cycle Network and states, inter alia,

- *The routes and infrastructure which comprise the Comprehensive Guildford Borough Cycle Network, including the cycle elements of the Sustainable Movement Corridor, as represented on the Policies Map, will be the starting point for the identification of improvements, primarily for utility cycling, provided and/or funded by new development.*
- 1. *Development proposals are also required to deliver the site-specific requirements for cycle infrastructure as identified in site allocation policies and also may include further requirements identified as part of the planning application process where justified.*

It is considered that the proposals do not appear to have taken account of the Comprehensive Guildford Cycle Network, part of which runs along Wisley Lane outside the site. Although it is noted that the highest traffic flows on an annual peak day are not anticipated to increase, the number of days on which a peak will occur are likely to increase, potentially impacting cyclist amenity and safety.

The NPPF states 110 (a), that *“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.”*

It is noted that footway improvements at the car park access points are proposed and would be required by a planning condition, but these will be very local in benefit and will not mitigate the potential impact on cyclist amenity or safety.

In response, the applicants make the following background points:

1. Car park 4 has been used for overflow car parking for well over 15 years now and due to the investment and growth of visitor numbers they wish to regularise a greater number of days for it to be used;
2. They consider that the level of use being promoted of up to 150 days per annum is proportionate to current and future visitor growth and is appropriate development in this Green Belt setting. They consider that it is unlikely to hit this figure initially and there is absolutely no desire or wish to go beyond that figure and consider that this could be secured by a suitably worded planning condition.
 - The use of the overflow car park is invariably seasonal, so mostly used between March and October, with some pinch points for popular events such as the flower show, craft fair and taste of Spring and taste of Autumn shows.
 - The car park is properly and carefully managed by our accredited external operator who have successfully managed its operation for many years now. It is not and has never been a free for all. It rarely reaches anywhere near capacity.
 - Wisley Village is entering a new master planning phase that is the subject of other discussions with the Council.

With regards to the use of the field and the suitability of the surface of the field for parking, the applicants note that the surface of the site is sandy and well-drained and does not suffer from mud or mud going onto Wisley Lane. Its use is mostly seasonal between March and November with occasional use during winter days. The applicants also state that they are very keen to keep the low-key appearance of the overflow car park going. The field is in a countryside setting and they would resist an over engineered solution on the basis that it is not a necessity

and would be completely out of keeping the Green Belt countryside setting. In their view the use is akin to many countryside properties or events locations.

The applicants also state that a team has put together a Travel Plan Review document which they have submitted to the Council and to Surrey CC Highways. They state that this dovetails with the appointment a new Sustainable Travel Executive at the RHS. They state that sustainability and encouraging other modes of transport are key for RHS. However, the report recognises the geographical location of RHS Wisley and the fact that the car will continue to dominate for both staff and visitors for the foreseeable future.

With regards to the current application the Travel Plan Review Document notes the submission of this application, and that the car park will not be open unless spaces within the other car parks are predicted to reach capacity or RHS Wisley are holding a specific event, or during public holidays or periods of fine weather where it is known visitor numbers will exceed the parking capacity of the other car parks on site. Importantly the carpark will be prioritised to staff and volunteers who arrive early and leave later than most visitors; this means that the main car parks will operate more effectively for the churn of visitors and importantly also have less impact on the length of Wisley Lane. This is an essential development of our Travel Plan arrangements.

The Travel Plan Review Report has been seen by Surrey CC who note that there is a requirement for travel plan monitoring reports to be submitted to the LPA and to SCC and therefore the report has been assessed against the travel plan conditioned under 16/P/01080. A response has been sent to RHS Wisley outside of this application.

In light of these comments, it is considered that the proposals do not comply in full with Local Plan Policies ID3 and ID9, but that due to the specific circumstances of this application, the limited harm caused by this would not be of sufficient weight to warrant a refusal of planning permission in itself. However, the limited harm caused should be weighed up in the planning balance. This is discussed further below.

Bio-Diversity Issues

Local Plan Policy ID4 seeks to maintain, conserve and enhance biodiversity; permission will only be granted for proposals where it can be demonstrated that doing so would not be harmful to the nature conservation interests of the site. A Preliminary Ecological Appraisal and Bat Scoping Assessment has been submitted in support of the application. This report recognises that the site is dominated by modified grassland, with occasional buildings, trees and hard standing. The report concludes that the proposal to increase the use of the car park will only affect habitat of low ecological value.

It is noted that the report refers to 100 days rather than the 150 days sought by this application. However, this does not impact on the report's conclusion. It is accepted that the site is of low ecological value and that the proposals will have a limited impact on that value. It is recommended that a condition be imposed which would seek proportionate biodiversity enhancements.

Other Considerations

As noted above, it is considered that the use of the land for car parking for up to 150 days per annum would constitute inappropriate development in the Green Belt. In such circumstances, it is necessary to consider whether there are any very special circumstances which would outweigh the harm that is caused by reason of inappropriateness and any other harm identified.

In support of the proposals, the applicants have put forward the case that the development proposals do not constitute inappropriate development in the Green Belt. However, in the event that the proposed development is considered to constitute inappropriate development, the following considerations have been identified

- nationally important horticultural destination garden with charitable scientific purpose - The Royal Horticultural Society is the UK's leading gardening charity. RHS Wisley is the flagship garden of the Royal Horticultural Society. The development will support the existing high-quality visitor attraction of a Destination Garden. The proposal will in turn support the wider functions of the Royal Horticultural Society including their research and development, education and charitable focusses through increased visitor numbers. These are nationally important and recognised.
- significant economic benefits - The RHS is a nationally significant Destination Garden that drives large and sustained visitorship to the borough. The employment on site, together with the supply chain and visitor spend amounts to a major economic impact for the site and surrounding area. At present, the economic capacity of the garden is restricted by accessibility to the site during congested car parks, also capacity of these car parks in peak periods. Additional car parking further down Wisley Lane will release congestion and divert and release capacity to the north of the site. With this increased traffic flow and dispersed footfall, the visitorship has proved over the years to be better managed and more appropriate for a quality destination. By increasing, the usage to up to 150 days will benefit visitorship and experience whilst reducing risk. Without additional car parking, the RHS is unable to operate at the capacity the garden requires to be successful, particularly following the interest in outdoor recreation and horticultural interest.

(i) benefits to the visitor/ tourist attraction offer of the site - Paragraph 84 of the NPPF states *"planning policies and decisions should enable*

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- b) the development and diversification of agricultural and other land-based rural businesses;*
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and*
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship"*

Guildford Borough Local Plan Policy E5 reflects national policy in relation to (a) with (c) dealt with by Policy E6. Policy E6 (Leisure and visitor experience) confirms the LPA will continue to develop a high-quality visitor experience to increase the contribution that tourism, arts, cultural heritage and sport make to our quality of life and social and cultural wellbeing. To achieve this policy E6 states it will support:

- (i) *The provision of new and enhanced leisure and visitor attractions, include arts and cultural facilities, in accordance with the sequential test outlined in the NPPF for main town centre uses; and*
- (i) *sustainable rural tourism and leisure developments that benefit businesses, communities and visitors in rural areas as long as they respect the size, character and function of their setting and comply with national green belt policy. This support extends to the re-use of suitable rural buildings for*

*visitor accommodation and other small scale rural development proposal
less than 100 sqm of additional floorspace”*

The proposal provides for an enhancement to the existing (lawful) car parking facilities at car Park 4, enabling the continued development of a high-quality visitor experience at RHS Wisley.

As noted above, substantial weight is given to the harm that is caused to the Green Belt by reason of inappropriateness. Further limited harm has been identified in relation to the conflict that has been identified in relation to adopted Local Plan policies ID3 and ID9 relating to sustainable modes of transport.

The other considerations noted above are acknowledged by the Council, and in particular the role that RHS Wisley plays as a nationally important horticultural destination which also has wider functions including their research and development, education and charitable. The significant economic benefits of RHS Wisley to the local economy are also recognised and the role that car parking and overflow parking plays in the smooth running of the operations on the site is noted. The additional overflow parking at Car Park 4 has an important role to play in easing congestion at the main site and can divert and release capacity which serves to improve the visitor experience at the main site. It is acknowledged that there is policy support at both a national and local level for new and enhanced facilities for visitors and that the location of RHS Wisley in the Green Belt and away from the main centres of population and public transport facilities inevitably leads to most visitor trips being made by private car. It is accepted that there is a direct need to overflow parking to ease congestion in the main car parks and that the use has been ongoing for a period of time without causing significant adverse harm to the amenities of nearby local residents or to the character of the area. The site is already in use as an overflow car park, under a temporary permission granted by the General Permitted Development Order for up to 28 days per year. It is acknowledged as being a suitable site in close proximity to the main garden with good pedestrian links and that is overseen and well managed by car park marshals.

The use of the site for up to 150 days per annum, represents an acceptable compromise which will minimise the impact of the proposals on the openness of the Green Belt and will ensure that the site remains as open for the majority of the year. The main use would be in the summer months when the surface of the site is more likely to be dry and less likely to be damaged by vehicles.

It is considered that the use of the site should be limited by planning condition to no more than 150 days per annum and that this should be monitored on an annual basis (on the anniversary of a planning permission) through the submission of an annual monitoring report which sets out in detail the number of days that the overflow car park is used.

In light of these comments, it is considered that the other considerations identified are of sufficient weight to clearly outweigh the harm that has been identified and constitute very special circumstances.

Conclusion.

Planning permission is sought for the use of the application site as an occasional overflow car park for up to 150 days per annum and for the use of the former cricket pavilion for purposes ancillary to the use of the car park.

The site is located in the Green Belt where there is a presumption against inappropriate development. It is considered that the use of the site as an overflow car park constitutes

inappropriate development in the Green Belt. However, it is also considered that very special circumstances have been demonstrated which would clearly outweigh the harm that is caused by reason of inappropriateness and the other harm identified.

The use of the former cricket pavilion as a welfare facility for RHS staff at the car park and on the main site is considered acceptable and would not represent inappropriate development in the Green Belt.

In these circumstances, it is recommended that planning permission be granted subject to conditions.