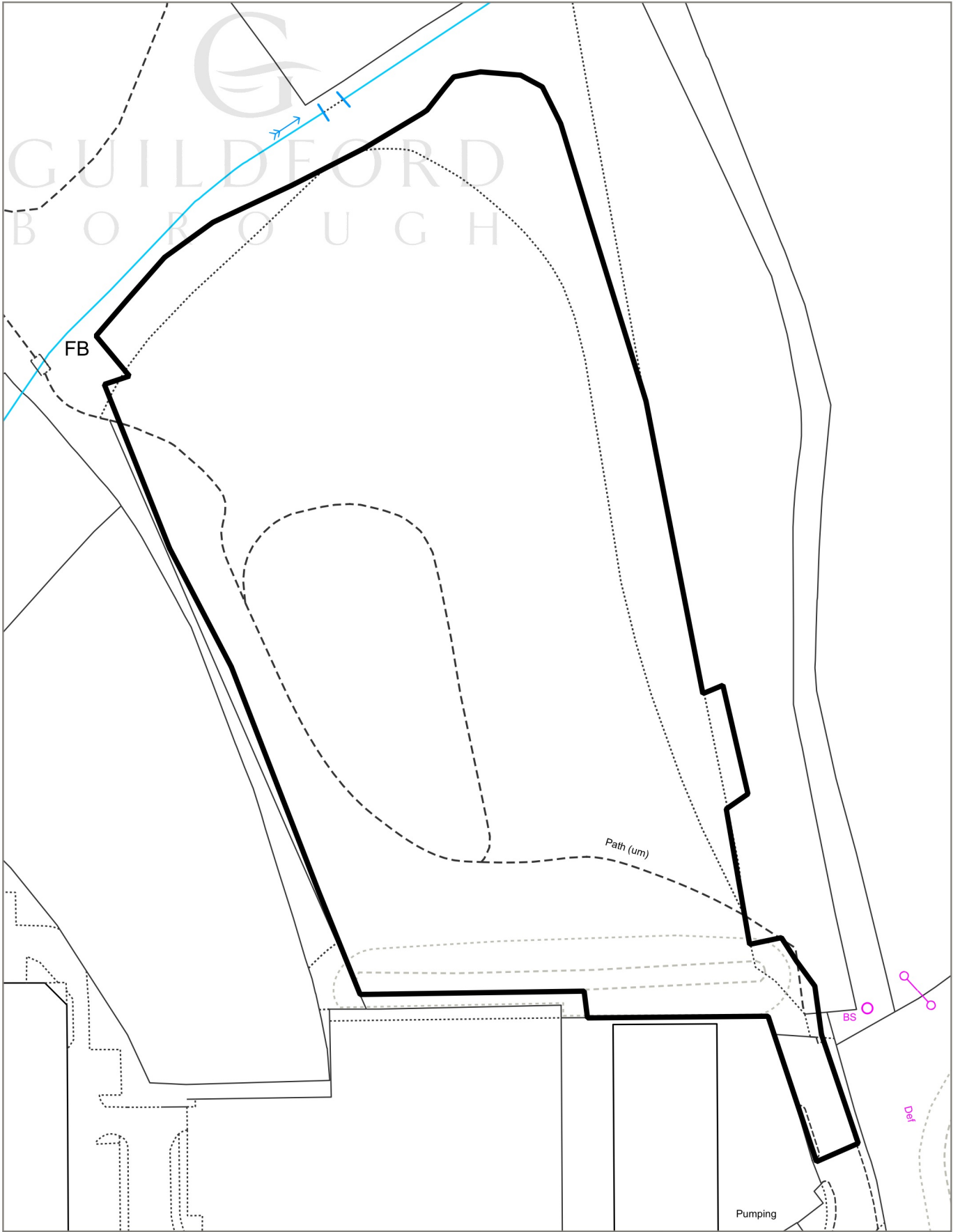


21/P/01882 - North Moors Allotment Site, North Moors, Worplesdon, Guildford



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GUILD FORD
B O R O U G H

21/P/01882 – North Moors Allotment Site, North Moors, Worplesdon, Guildford, GU1 1SE



Not to scale

App No: 21/P/01882 **8 Week Deadline**
Appn Type: Full Application **Extension of time:** 30/04/2024
Case Officer: Joanna Chambers
Parish: Worplesdon **Ward:** Worplesdon

Agent: Savills **Applicant:** Guildford BC
Mountbatten House, Millmead
1 Grosvenor Square Guildford
Southampton Surrey
SO15 2BZ

Location: North Moors Allotment Site, North Moors, Worplesdon,
Guildford, GU1 1SE

Proposal: Change of use of amenity land to deliver 78 allotment plots, bee keeping facilities, composting areas, community buildings, landscaping and associated cycle storage and car parking (Revision of Location Plan to Application 20/P/00197).

Executive Summary

Reason for Referral

This application has been referred to the Planning Committee because the Council is the owner of the land and also the applicant. It relates to the adjoining Slyfield Area Regeneration Project (SARP) which is one of the largest strategic sites (Site A24) in the Guildford Borough Local Plan: strategy and sites (LPSS) 2019 and the Council's main regeneration project.

Key Information

The application has been submitted on behalf of Guildford Borough Council ('the Applicant') acting in its capacity as landowner in support of the Slyfield Area Regeneration Project (SARP). Hybrid planning consent (Ref: 20/P/02156) was granted in March 2022 for a sustainable, mixed-use riverside community now referred to as Weyside Urban Village (WUV). The WUV masterplan incorporates new homes integrated alongside landscaped open spaces, associated community, and retail facilities, with associated infrastructure

including highways and green spaces. The site has the capacity to deliver approximately 1,500 new homes together with community and employment uses.

The development is required to facilitate the WUV development which requires the re-provision of allotments from the existing Bellfields site. GBC purchased the application site to relocate up to 724 rods, with the remaining provision to be located at the existing Aldershot Road allotment site.

The application site comprises approximately 2.4ha of land to the north of Slyfield Industrial Estate. The boundaries are marked by a mix of woodland, hedgerows and dry ditches. The site is accessed from North Moors which is within the Industrial Estate. A public footpath runs across the site and through the woodland to the east which links Slyfield to Jacobs Well. A public footpath diversion order has been granted to accommodate the proposed development.

The application seeks the change of use of the land to allotments and would provide 78 new allotment plots (724 rods) and 2 bee keeping plots. The application also includes the provision of a small building containing w.c. facilities, an office and storage areas. Each of the plots would include a 6x4ft shed and a water-butt. Water for the plots would also be available from standpipes distributed throughout the site. Access to the site would be from North Moors which would lead to a small car park for 9 vehicles and approximately 6 bicycles.

Planning permission was granted for the same development in June 2020 (Application Ref: 20/P/00197). and site clearance and preparatory works commenced in October 2020. However, having undertaken the site clearance work under this extant planning consent, it came to the attention of the Applicant that the site boundary shown on the planning application was incorrect. This necessitated the submission of a new full planning application (the current planning application) in September 2021 to regularise the site boundary and to move the boundary 2m further south. Following consultation and discussions with adjoining landowners it subsequently became apparent that an additional tranche of updates to the approved drawings were necessary, principally in regard to the site's southern boundary to exclude land owned by The Post Office. The design and layout of the proposed allotment facilities (storage, office space. Toilets etc) were also updated in consultation with The Guildford Allotments Co-operative Society Ltd (GAS). These revised drawings were submitted in September 2023 and the time elapsed due to the

need for further work to be undertaken accounts for the delay in determination of this application.

Following the commencement of development in October 2020 under the extant planning consent (20/P/00197), a significant amount of work has been undertaken comprising:

- Creation of the allotment plots to the north/ east of the original PROW;
- Construction of the car park and access driveway (currently waiting to be surfaced and no buildings on site);
- Installation of allotment boundary fencing and gate;
- Installation of drainage infrastructure

The following works are required to complete the development:

- Completion of allotments to the west/ south of the original PROW
- Installation of allotment buildings
- Installation of landscaping and boundary planting.

The current application is required to enable the completion of the allotments and approval is sought to the following changes to the approved scheme:

- i) Realignment of the southern boundary (red line) to exclude the Post Office land;
- ii) Associated redesign of the car park, allotment facilities and vehicular access and amendment to allotment layout (Plots 1 and A7);
- iii) Reduction in the EV charger capacity from 7kw to 3.6 kw due to lack of electrical capacity in the local grid.

Summary of Considerations and Constraints

Planning permission was granted for the development of the North Moors Allotment site in October 2020 and the principle of development has therefore been established. Development has commenced under the extant consent and a significant amount of work has been undertaken. The current application seeks to formalise changes to the site boundary and layout of the allotments and design of associated facilities to enable the allotments to be completed and made available for use.

The application site is located within the Green Belt and is adjacent to the Slyfield Industrial Estate and the Slyfield Area Regeneration Project site. The proposal constitutes appropriate development in the Green Belt and would be

a significant benefit to the local community supporting local and national objectives for healthy and active lifestyles. The development of the allotments in this location would not prejudice the delivery of the adjoining waste treatment plant and will facilitate the wider Slyfield Area Regeneration Project.

The development necessitates the loss of semi-improved grassland, scrub, scattered (young) trees, (young) plantation woodland and tall ruderal habitat. However, the proposed design provides for embedded mitigation, avoiding effects on features of ecological value with further measures to deliver compensation and biodiversity enhancements as set out in the previously approved and implemented Landscape and Ecology Management Plan (LEMP). The LEMP also forms part of the current application. The development would not materially impact on the character of the area, residential amenity or highway safety.

Some concerns have been raised by The Guildford Allotments Co-operative Society Ltd (GAS) about the revised layout and location of the allotment facilities and the attendant risk of crime/ anti-social behaviour. The Applicant advises that the proposed layout is the configuration that best delivers on these requirements whilst working within the confines of the existing site in respect to levels, trees and landscaping which constrain the width and arc of the access track to the east. A condition is proposed to address concerns about security which requires the implementation of a written scheme for the reduction of opportunities for crime including details of locks, lighting and CCTV. The Applicant has subsequently met with GAS to discuss the project in further detail, and this has resulted in amendments to the internal layout of the allotment facilities.

Officers are satisfied that the changes to the planning application do not deviate from the scheme previously approved by Planning Committee at the meeting on 19th June 2020. The proposals comply with the requirements of National Policy, local plan (including the Local Plan Part 2 adopted in March 2023).

For these reasons, and the reasons set out in the body of the report, the proposal is in accordance with the development plan.

RECOMMENDATION:

That this application be **GRANTED** subject to the conditions set out below for the reasons set out in the body of the report.

1. The development hereby permitted shall commence 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 list of approved plans and documents.

Drawing No/Document	Title
SNPL442977_303 Rev C	Location Plan
SNPL442977_302 Rev N	Proposed Facilities
SNPL442977_Rev M	Landscape Proposals
SNPL442977_304 Rev A	Services Floor Plan
20233-MA-XX-NOMO-DR-C-0101-D4-P02	General Arrangement
20233-MA-XX-NOMO-DR-C-0111-D4-P02	Statutory Undertakers
20233-MA-XX-NOMO-DR-C-0201-D4-P02	Site Clearance
20233-MA-XX-NOMO-DR-C-0601-D4-P02	Contours Plan
20233-MA-XX-NOMO-DR-C-0701-D4-P02	Road Pavements
20233-MA-XX-NOMO-DR-C-1101-D4-P02	Kerbs Footways and Paved Areas
20233-MA-XX-NOMO-DR-C-1201-D4-P02	Road Markings & Signs
20233-MA-XX-NOMO-DR-C-2601-D4-P02	Horizontal Alignments & Long Sections
20233-MA-XX-NOMO-DR-C-2655-D4-P02	Cross Sections
20233-MA-XX-NOMO-DR-C-4005-D4-P02	Standard Details (Sheet 1 of 2)

20233-MA-XX-NOMO-DR-C-4006-D4-P02	Standard Details (Sheet 2 of 2)
20233-MA-XX-NOMO-DR-D-0501-D4-P02	Drainage Layout
20233-MA-XX-NOMO-DR-D-4505-D4-P01	SUDS Cross Section Details
19215-MA-SK-101 Rev P08	Car Park Access Road -
42287/2001/001	Proposed Lighting Layout
J6/04030	2.44m High Securimesh Fence Detail
Stantec, February 2020	Lighting Note
Stantec, January 2020	Flood Risk Assessment
Stantec, January 2020	Preliminary Site Waste Management Plan
Stantec, January 2020	Preliminary Contamination and Land Stability Assessment
Stantec, January 2020	Surface Water Drainage Strategy
Stantec, April 2020	Response to LLFA
January 2020	SCC Surface Water Pro Forma
Stantec, January 2020	Sustainability Statement
Kernon Countryside Consultants, January 2020	Assessment of Soil Suitability
Orion, January 2020	Heritage Baseline Assessment
PBA, October 2019	Landscape and Visual Technical Note
Markides Associates, January 2020	Transport Statement
Stantec, 31 August 2021	Landscape and Ecological Management Plan
Stantec, 31 August 2021	Ecological Assessment Report Rev1
Treework Environmental, 27 August 2021	Arboricultural Method Statement
Treework Environmental, 27 August 2021	Arboricultural Impact Appraisal
Markides Associates, December 2023 (Ref: SNPL 442977 Rev V1)	Technical Response to LLFA Comments
November 2022	Hydraulic Calculations
December 2023	SuDS Management Plan

Reason: To ensure the development is carried out in accordance with the approval and to ensure the quality of development indicated on the approved plans and documents is achieved in practice.

3. The development hereby permitted shall be undertaken in accordance with the approved Arboricultural Method Statement and Arboricultural Impact Assessment (Ref: 200317-1.3-ARAG-AIA-LF). The development shall be carried out in accordance with the agreed method statement and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until fencing has been erected in accordance with the Tree Protection Plan. Within any area fenced in accordance with this condition, nothing shall be stored, placed or disposed of above or below ground, the ground level shall not be altered, no excavations shall be made, nor shall any fires be lit, without the prior written consent of the local planning authority. The fencing shall be maintained in accordance with the approved details, until all equipment, machinery and surplus materials have been moved from the site.

Reason: To protect the trees on site which are to be retained in the interests of the visual amenities of the locality. This is required to be a pre-commencement condition to ensure that tree protection is installed before work commences.

4. The development shall be undertaken in accordance with the approved Landscape Proposals. There shall be no variation from the approved details and the landscaping scheme shall be fully implemented before the allotments hereby approved are first brought in to use (or other timescale as may be agreed in writing with the Local Planning Authority). Any of the proposed trees, shrubs or plants that die, become damaged or diseased within 10 years of planting shall be replaced by replacement of a similar size and species to those that are to be removed.

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

5. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking or re-enacting or amending those Orders with or without modification), no buildings, structures, fences or hard surfaces shall be erected or created on the site other than those shown on the approved plans.

Reason: In the interests of visual amenity and to control further development within the site.

6. The development hereby approved shall be carried out in accordance with the mitigation measures detailed in the Ecological Assessment Report (dated August 2021) and the Landscape and Ecological Management Plan (dated August 2021) and there shall be no variation from the approved details unless first agreed in writing with the Local Planning Authority. Following the completion of the development, the site and the proposed replacement landscaping areas shall continue to be managed in accordance with the recommendations of these documents.

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

7. The development hereby approved shall be undertaken in accordance with the approved drainage and SUDs scheme. Prior to the first use of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

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

8. No vehicle shall access the site from North Moors unless and until the proposed vehicular access hereby approved has been constructed in accordance with Drawing 20233-MA-XX-NOMO-DR-C-0101 P02.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework 2023.

9. The development hereby approved shall not be first opened for use unless and until informal crossing points in the form of dropped kerbs and tactile paving have been provided at the following locations:

- (i) across the proposed access road where it meets the proposed parking area;
- (ii) across the bellmouth of Dennis Way; and
- (iii) across the proposed access road where Footpath 438 meets the proposed new carriageway

in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. Thereafter the informal crossing points shall be retained and maintained for its designated purpose.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework 2023.

10. The development hereby approved shall not be first opened for use unless and until space has been laid out within the site in accordance the approved plans for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking and turning area shall be retained and maintained for its designated purpose.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework 2023.

11. The development hereby approved shall not be first opened for use unless and until one of the available parking spaces is provided with a 3.6kW electric vehicle charging socket in accordance with the approved plans, and thereafter shall be retained and maintained to the satisfaction of the Local Planning Authority.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to promote sustainable forms of transport in accordance with the requirements of the National Planning Policy Framework 2023.

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

Reason: The above conditions are required 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 National Planning Policy Framework 2023.

13. The development hereby approved shall not be occupied until a written scheme for the reduction of the opportunities for crime, including details to be implemented such as locks, lighting and CCTV has been submitted to and approved by the Local Planning Authority. Once approved, the agreed measures shall be implemented in accordance with the agreed timescale and reviewed and developed in consultation with users of the allotments and to the reasonable satisfaction of the Local Planning Authority.

Reason: To manage the risk of crime and anti-social behaviour.

Informatives:

1. If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain

prior written Consent. More details are available on our website. If proposed works result in infiltration of surface water to ground within a Source Protection Zone, the Environment Agency will require proof of surface water treatment to achieve water quality standards. If there are any further queries please contact the Flood Risk, Planning, and Consenting Team via SUDS@surreycc.gov.uk. Please use the reference number in any future correspondence.

2. The applicant is expected to ensure the safe operation of all construction traffic 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. The developer is also expected to require their contractors to sign up to the "Considerate Constructors Scheme" Code of Practice, (www.ccscheme.org.uk) and to follow this throughout the period of construction within the site, and within adjacent areas such as on the adjoining public highway and other areas of public realm. 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.
3. It is the responsibility of the developer 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. Where undercover parking areas (multi-storey car parks, basement or undercroft parking) are proposed, the developer and LPA should liaise with Building Control Teams and the Local Fire Service to understand any additional requirements. If an active connection costs on average more than £3600 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.
4. It is the responsibility of the developer to provide e-bike charging points with socket timers to prevent them constantly drawing a current over night

or for longer than required. Signage should be considered regarding damaged, or shock impacted batteries, indicating that these should not be used/charged. The design of communal bike areas should consider fire spread and there should be detection in areas where charging takes place. With regard to an e-bike socket in a domestic dwelling, the residence should have detection, and an official e-bike charger should be used. Guidance on detection can be found in BS 5839-6 for fire detection and fire alarm systems in both new and existing domestic premises and BS 5839-1 the code of practice for designing, installing, commissioning, and maintaining fire detection and alarm systems in non-domestic buildings.

5. The developer is advised that Public Footpath Numbers 438 and 581 cross the application site 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.

Officer's Report

Site Description

The application site comprises approximately 2.4ha of land to the north of Slyfield Industrial Estate. The site formerly comprised scrub grassland with a small areas of young regenerating woodland in the northern part of the site. The site has been cleared and has been laid out as allotments under the extant planning consent (20/P/00197). The boundaries are marked by a mix of woodland, hedgerows and dry ditches. The site is accessed from North Moors which is within the Slyfield Industrial Estate. There is a public footpath running adjacent to the east boundary of the site which links Slyfield to Jacobs Well. A public Path Diversion Order was approved on 26th October 2023 for the diversion of the public footpath which runs through the site to allow for the development of the allotments.

The site is bounded to the south by a Royal Mail depot which is within the Industrial Estate while the north, east and west boundaries adjoin open fields.

Proposal

Consent for the use of the land as Allotments was granted on 17th June 2020 (20/P/00197). Having undertaken extensive site clearance work it came to the

attention of the Applicant that a chain-link fence had mistakenly been used as the site's southernmost boundary in the planning application. On review, the Applicant confirmed the land between the chain-link fence and steel palisade fence should have been included within the site and the chain-link fence could be removed. This necessitated the submission of a full planning application in order to correct this error and to move the red line and blue planning application boundary lines 2m further south.

Alongside the red line correction, the new application seeks to regularise a number of additional items which have arisen during the preparation of the construction drawing pack. Due to inaccuracies identified in the topographic survey, further access and arboricultural constraints have been identified at the north-west and eastern boundaries. In order to mitigate impacts on trees in these areas, the boundaries have been reduced.

The proposed changes may be summarised as follows:

- i. Realignment of the southern boundary (red line) to exclude the Post Office land;
- ii. Associated redesign of the car park, allotment facilities and vehicular access and amendment to allotment layout (Plots 1 and A7);
- iii. Reduction in the EV charger capacity from 7kw to 3.6 kw due to lack of electrical capacity in the local grid.

The number of allotment plots remains as permitted (78 No.) but due to the change in site boundary, the order and size (nos. of rods) of some of the plots as shown on the landscape plan has changed.

Relevant planning history

Planning reference	Description	Decision	
20/P/02155	Hybrid planning application for the redevelopment of part of the allocated site for the Slyfield Area Regeneration Project for a mixed-use development (known as Weyside Urban Village) comprising: A. Outline planning approval for the demolition of existing buildings and infrastructure and outline planning permission for up to 1550 dwellings;	Granted March 2022	30

local centre comprising up to 1800 sqm of retail (inc. convenience store), healthcare, community, nursery and flexible employment uses (Use Class E); up to 500 sqm of flexible community facilities (Use Classes E/F1/F2); up to 6,600 sqm of flexible employment space (Use Classes E/B2/B8); up to 30,000 sqm for new Council Depot Site (Use Classes E/B8); 6 Gypsy and Traveller pitches (Use Class C3); and associated road infrastructure, landscaping (including Sustainable Drainage Systems) and amenity space.

- B. Full planning permission for the development of primary and secondary site accesses, internal access roads and associated landscaping.
- C. Full planning permission for engineering operations associated with remediation and infrastructure, including primary and secondary substations; utilities and drainage (including Sustainable Drainage Systems).

20/P/00197	Change of Use of amenity land to deliver 78 allotment plots, bee keeping facilities, composting areas, community buildings, landscaping and associated cycle storage and car parking	Granted 22 nd October 2020
ROW/3310143M	Footpath at North Moors, Public Path Diversion Order 2022 with modifications to part of new path	Confirmed 26 th October 2023

Consultations

Two rounds of consultation have been undertaken on this planning application. The first round of consultation related to the proposals submitted in August 2021 and the second followed the submission of amended drawings in September 2023.

The consultation responses are summarised below.

Natural England: No comments.

Environment Agency: No comments.

SCC Lead Local Flood Authority: No objection subject to conditions to ensure that the SuDS Scheme is properly implemented and maintained throughout the lifetime of the development.

Officer Note: The LLFA requested further information regarding the proposed surface water drainage scheme which the applicant has provided in December 2023.

County Highway Authority: No objection subject to conditions including the provision of additional dropped kerbs and provision for cycle parking. The additional dropped kerbs are considered justified given that since the existing consent was granted, SCC have adopted LTP4 (2022) and SCC's Healthy Streets (2023) policies which place a far greater emphasis on pedestrian accessibility and promoting active travel. The CHA is satisfied with the proposed number of cycle parking spaces provided but require that e-bike charging is provided. The CHA would be satisfied with a timed three-pin socket to serve the 6 Sheffield stands proposed. The reduction in the EV charger capacity is acceptable and will be reflected in the wording of the planning condition.

Surrey CC Historic Environment: The application is supported by a desk-based heritage assessment produced by Orion Heritage Ltd which has consulted all available sources and concludes that the site has a low archaeological potential and has been previously disturbed by landfill operation. It is therefore very unlikely that significant archaeological remains will be impacted upon by the proposals and the assessment fulfils the policy requirement and no further archaeological works will be required.

Surrey Wildlife Trust: SWT has advised that the documentation submitted does constitute up to date information and without up-to-date ecological survey information it is difficult for SWT to advise fully on the ecological consequences of the proposed development. Therefore, SWT has

recommended that prior to determination of this planning application, the development site is subject to an updated ecological assessment undertaken by a suitably qualified ecologist to help determine the status of ecological features on site which could be adversely affected by the proposed development works, and to put forward for consideration by the LPA any required impact avoidance and mitigation proposals to prevent such effect. SWT also advise that an appropriately detailed biodiversity net gain assessment should be submitted to demonstrate a measurable biodiversity net gain and how this will be secured.

Officer Comment: SWT acknowledge that development of the site has commenced and substantially implemented under the extant consent and that some of the site conditions may now be markedly different to the approved ecological assessment. SWT also acknowledges that the revisions to the extant consent being applied for under the new application are not significantly different to the approved scheme. Given that the development has been substantially implemented (including site clearance) in accordance with the extant consent and the current application relates only to the final stages of the project, Officers are of the view that it would be expedient for the development to be completed in accordance with the previously approved ecological assessment and Landscape and Ecological Management Plan which has already been implemented and will secure appropriate ecological benefits on the site.

Thames Water: No comments

Guildford Allotment Society: Concern about loss of allotment land due to reduction of plots and further details of access, drainage and waste storage requested. Also concerned about delay in making the new allotments available for use. GAS requested in their response of November 2023 that the following comments be reported to Planning Committee.

‘This revision is only required because GBC got the original landholding and site boundary wrong; the remedy has been an inferior development to that originally proposed. The revised building location materially obstructs the line of sight between plots and the entrance, which was a security feature of the original plan. There is considerable anxiety about the isolation of the site and security was a major part of the original planning application. Vehicle access to the trackways on site is now impeded by the buildings being re-sited, thus reducing the ease of ability to deliver direct to plotside using larger vehicles. The preferred positioning of the buildings is next to the southern boundary, as

close as possible to the original proposed siting; preferably to the west of the now constructed car parking area. We requested this at the time of the plans being drawn up but were told that to do it any differently would mean having to go for planning permission again and they didn't want to delay the project. We now see that they have had to go for Planning Permission and therefore why can't our requests be taken into account? Having the buildings close to the boundary allows better use of the remaining land for allotment use, the whole purpose of the site in the first place. We strongly urge the Planning Authorities to give consideration to re-siting the buildings as we request. We are the users and potential managers of this site and feel our not unreasonable suggestions should be taken into consideration'.

Officer Comment: The Applicant has advised that discussions have continued with the Guildford Allotments Society to address these concerns. The Applicant has responded to the issues raised as follows:

'The realignment of the southern red line boundary was necessary to account for a discrepancy in the title plans of the site and the Post Office building to the south. The movement of the southern boundary necessitated an internal redesign of the car park, proposed facilities, access, and the revised PRow, ensuring that these are situated wholly in Guildford owned land. Informing this redesign exercise were a number of key technical principles and design points that that the redesign was duty bound to incorporate:

- *No overall loss of allotments rods*
- *Provision of 2no. DDA Bays (with sufficient aisle width)*
- *Dropped kerb footway*
- *Sufficient room for an ambulance to access and turn*
- *Incorporation of an infiltration trench*
- *Vehicular access to the allotment plots*

The proposed layout submitted is the configuration that best delivers on these requirements whilst working within the confines of the existing Site in respect to levels, trees and landscaping which constrain the width and arc of the access track to the east. Whilst the proposed buildings will sit somewhat between the allotments and the entrance this will be the case for only a small number of the plots immediately adjacent. Oversight/passive surveillance of the entrance and car park will be available from all other plots.'

As a result of the on-going engagement with the Guildford Allotments Society since the submission of their representations in November 2023, some further amendments have been made to the internal arrangement of the allotment facilities to address their requirements. A condition is also proposed which requires the submission of a written scheme for the reduction of opportunities for crime including details of locks, lighting and CCTV.

Planning Policies

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

The Guildford Borough Local Plan: Strategy and Sites was adopted by Council on 25 April 2019. The Plan carries full weight as part of the Council's Development Plan.

Policy S1 Presumption in favour of sustainable development

Policy S2 Planning for the borough- our spatial strategy

Policy P4 Flooding, flood risk and groundwater protection zones

Policy P5 Thames Basin Heaths Special Protection Area

Policy D1 Place shaping

Policy D2 Climate change, sustainable design, construction and energy

Policy D3 Historic environment

Policy ID1 Infrastructure and delivery

Policy ID3 Sustainable transport for new developments

Policy ID4 Green and blue infrastructure

Site Allocation A24: Slyfield Area Regeneration project, Guildford

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

Policy P6: Protecting Important Habitats and Species

Policy P7: Biodiversity in new developments

Policy P9: Air quality and Air Quality Management Areas Policy

Policy P10: Water quality, Waterbodies and Riparian Corridors

Policy P11: Sustainable Surface Water Management

Policy D5: Protection of Amenity and Provision of Amenity Space

Policy D6: External Servicing Features and Stores

Policy D7: Public Realm

Policy D11: Noise Impacts

Policy D12: Light Impacts and Dark Skies Policy

Policy D15: Climate Change Adaptation

Policy ID7: Community Facilities

Policy ID9: Achieving a Comprehensive Guildford Borough Cycle Network

Policy ID10: Parking Standards

National Planning Policy Framework (NPPF):

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 13: Protecting Green Belt Land

Chapter 14. Meeting the challenge of climate change, flooding and coastal change

Chapter 15. Conserving and enhancing the natural environment

Chapter 16. Conserving and enhancing the historic environment

Surrey Waste Plan 2019-2024

Policy 11A: Strategic Waste Site Allocations

Policy 12: Wastewater Treatment Works

South East Plan 2009 (as saved by CLG Direction):

Policy NRM6 Thames Basin Heath Special Protection Area Page 6

Supplementary planning documents:

Strategic Development Framework SPD (July 2020)

Parking Standards SPD (March 2023)

Climate Change, Sustainable Design, Construction and Energy SPD (2020)

Other guidance:

National Design Guide (NDG) (2019)

Surrey County Council Vehicular and Cycle Parking Guidance 2018

Designations relating to the site:

The application site is entirely within the Metropolitan Green Belt.

Planning Considerations and Appraisal

The main planning considerations in this case are:

- The principle of development

- Changes to the approved boundary and layout of the proposed development
- The impact on trees, vegetation and the character of the area
- The impact on protected species and biodiversity
- Drainage and the impact on flood risk
- The level of parking and impact on highway safety
- The risk of crime and anti-social behaviour

Principle of Development

The principle of development has been established under the extant planning permission ref: 20/P/00197.

The site is located wholly within the Green Belt. Development within the Green Belt is inappropriate unless it falls within a limited number of exceptions set out in the NPPF and these are reflected in Policy P2 of the Local Plan. One exception to the general presumption against development is the provision of appropriate facilities (including with a change of use of land) for outdoor sport, outdoor recreation, burial grounds and allotments, provided that the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. The change of use of land is also appropriate development provided in maintains the openness of the Green Belt and therefore the main consideration in assessing compliance with Green Belt policy is whether the built facilities are appropriate to the proposed use of the site as allotments. The development proposed includes very little in the way of built facilities with only a small building close to the entrance, which would include a small office, kitchenette and toilet facilities. Each plot would be provided with a 6x4 shed and a water butt; there would be a small structure for rainwater storage and the site would be secured by 2.4m mesh fencing. The built facilities are individually and cumulatively small in scale, are typical to support allotment sites, and are appropriate in all other respects. The development would have very little impact on the openness of the Green Belt and would not conflict with the purposes of including land within it.

Accordingly, it is concluded that the development represents appropriate development of this Green Belt site. The proposal complies with the objectives of the NPPF and Policy P2 of the Local Plan. The principle of the development is

therefore acceptable, and the main consideration relates to the impact of the proposed boundary change and layout of the allotments.

Changes to the approved boundary and layout of the proposed development

The site boundary has been amended to take account of land ownership and to address access and arboricultural constraints. Since the submission of the application, the southern boundary has been realigned to exclude land owned by the Post Office and the northwest and eastern boundaries have been reduced to mitigate impact on trees. As a result, whilst the number of allotment plots remains as permitted, due to the changes in site boundary, the order and size of a limited number of the plots shown on the landscape plan and the layout of the allotments has changed.

Concerns have been raised by the Guildford Allotments Society (GAS) about the proposed arrangement and the impact this will have on users. They are of the view that the revised building location materially obstructs the line of sight between plots and the entrance, which was a security feature of the original plan and that vehicle access to the trackways on site is now impeded by the buildings being re-sited, thus reducing the ease of ability to deliver direct to plotside using larger vehicles. GAS would prefer to see the buildings positioned next to the southern boundary, as close as possible to the original proposed siting, preferably to the west of the now constructed car parking area. GAS is of the view that having the buildings close to the boundary allows better use of the remaining land for allotment use and have asked the Planning Authority to give consideration to re-siting the buildings as requested.

The realignment of the southern boundary has necessitated an internal redesign of the car park, proposed facilities, access, and the revised PRow, ensuring that these are situated wholly in Guildford owned land. The redesign has been required to incorporate the following requirements:

- No overall loss of allotments rods
- Provision of 2no. DDA Bays (with sufficient aisle width)
- Dropped kerb footway
- Sufficient room for an ambulance to access and turn
- Incorporation of an infiltration trench
- Vehicular access to the allotment plots

The Applicant advises that the current layout best delivers on these requirements whilst working within the confines of the existing site in respect to levels, trees and landscaping which constrain the width and arc of the access track to the east. Whilst the proposed buildings will sit somewhat between the allotments and the entrance this will be the case for only a small number of the plots immediately adjacent. Oversight/passive surveillance of the entrance and car park will be available from all other plots and there will be views through the buildings to the car parking area.

The Applicant has been engaged in on-going discussions with the Guildford Allotment Society and whilst it has not been possible to relocate the buildings due to site constraints, some amendments have been made to the internal layout of the allotment facilities to meet user requirements. Given the constraints of the site and the operational requirements of the allotments, it is considered that the proposed layout is acceptable based on the information provided by the Applicant.

Impact on trees, vegetation and the character of the area

The changes to the site boundary and layout will not impact the appearance of the development and the character of the surrounding area. The Proposed Development will introduce small scale-built form into an otherwise unmanaged open site. However, the retention of the boundary trees would ensure that the development would have little impact on the visual amenities of the wider area and limit longer range views into the site including those from Jacobs Well. While glimpsed views of the allotments will be visible from the surrounding area and from the PRoW to the east of the site, the development adjoins an area characterised by existing large buildings within the Slyfield Industrial Estate and would not materially impact on the character or appearance of the local area.

The boundary changes have mitigated the impact of the development on existing trees with the retention of additional trees on the northwest boundary of the site. Proposals include the protection, retention and management of existing mature trees and vegetation within the GBC land holding. The majority of the mature woodland along the eastern boundary will be maintained, with enhancements as detailed in the Landscape and Ecological Management Plan. The use of Cellweb has been proposed to reduce the impact of the allotment

tracks on tree roots. An Arboricultural Impact Assessment and Arboricultural Method Statement have been submitted with the planning application.

Impact on protected species and biodiversity

The application site contains areas of potential habitat for protected species which include the regenerating woodland, scrub and grassland as well as the trees and hedges which mark the site boundary. An Ecological Assessment has been submitted in support of the application which identifies a scheme of mitigation that will be implemented alongside the development including new grassland and scrub planting, new trees within the woodland belts and the creation of shelter/hibernation features for reptiles. Surrey Wildlife Trust considered the document was sufficient to inform the consideration of the previous application and measures have been implemented in accordance with approved scheme of mitigation. The current planning permission does not propose any changes to the previously approved scheme of mitigation and measures to ensure protected species are not harmed by the proposed development during the construction phase. Replacement planting and habitat will be managed for the lifetime of the development for its biodiversity value, and this was made subject to a planning condition.

In responding to consultation on the current application, Surrey Wildlife Trust has expressed concern that the Ecological Assessment is out of date as it was prepared in 2019 and is now over 4 years old and that without up-to-date ecological survey information it is difficult to advise fully on the ecological consequences of the proposed development. Therefore, SWT has recommended that prior to determination of this planning application, the development site is subject to an updated ecological assessment undertaken by a suitably qualified ecologist to help determine the status of ecological features on site which could be adversely affected by the proposed development works, and to put forward for consideration by the LPA any required impact avoidance and mitigation proposals to prevent such effect.

Consideration has been given to SWT's advice in consultation with the applicant. In doing so, it is important to note that the site has been cleared under the previous consent and the revisions being applied for under the current application are not significantly different to the approved scheme. The

Applicant has been advised by Stantec that a re-survey at this time could act to devalue the original Biodiversity value and interests of the Site and in order to avoid de-valuing the baseline conditions of the Site with respect to Biodiversity in this new application, the Applicant has therefore presented the Ecological Conditions of the site prior to vegetation management and site clearance in the same manner as for the first Application. Given that the site has been cleared and development has commenced under the extant consent, it is considered that this is a reasonable approach and that the Ecological Assessment Report and the implementation of the agreed scheme of mitigation is acceptable in these circumstances. The requirement for a new Ecological Assessment and revised LEMP would also delay completion of the allotment site. Furthermore, it is not considered that a requirement for a Biodiversity Net Gain Plan would be reasonable in these circumstances given that the development has commenced under the extant consent and approved LEMP.

Under the extant consent, the applicant is required to undertake all the recommended actions in Section 4 of the Ecological Assessment Report and the Biodiversity enhancements detailed in Section 5. The previously approved Landscape and Ecological Management Plan (LEMP) has been submitted with the current planning application to ensure consistency and the Applicant will be required to undertake all the recommended actions to help protect habitat and species from potential adverse effects of the development process and maintain and enhance the biodiversity value of the site post development. In addition to the retention of the mature woodland along the eastern boundary, scrub planting, woodland herbaceous planting, individual tree planting and native species rich grassland planting is also proposed along the northern and eastern boundaries. A small amount of meadow and scrub mix planting is proposed along the western boundary and wildlife friendly planting will be provided within the allotment site. The Proposed Development will create habitat for a range of wildlife which may use the Site. Three snake mounds are proposed along the northeastern corner of the Site where grass snakes can lay and incubate their eggs. Additionally, several hibernacula, formed from stacked logs and vegetation, are proposed along the eastern boundary within the woodland. These will provide semi-natural habitat for use by a range of wildlife. Nest/roost boxes will be provided for bats, birds and invertebrates in the woodland belt for shelter/ hibernation. Two bee plots are proposed along

the eastern boundary of the planting area which will have benefits for both the allotments and the proposed ecological features including higher yield and better quality of produce, as well as aiding in the establishment of the proposed planting. The approved LEMP also outlines the on-going maintenance and monitoring necessary to support the landscape and ecological mitigation measures.

Designing out impacts and implementing appropriate mitigation, compensation and enhancement measures will enable the development to be ecologically sound, legally compliant and accords with national and local policy.

Drainage and the impact on flood risk

The application site is located partly in Flood Risk Zone 2 where there is a medium risk of fluvial flooding and part of the northern boundary of the site is also at risk of surface water flooding. The application is supported by a Flood Risk Assessment. The use of the land for allotments is considered to be a 'less vulnerable' use and is an appropriate use for land in Flood Zone 2.

A detailed surface water drainage scheme has been approved under Condition 7 of the extant consent and is being implemented. The Lead Local Flood Authority has confirmed that the amended design is acceptable. A granular material has been specified to be used on the main car parking running surface and this will allow water to infiltrate down through to the sub-base below and to the filter trench, as necessary. A condition is proposed to ensure the drainage system is constructed to the National Non-Statutory Technical Standards for SuDS.

The Level of Parking and impact on highway safety

The current application seeks the redesign of the car park and access as previously approved. Alongside these physical changes, the Applicant is also seeking to reduce the EV charger capacity from 7kw to 3.6kw due to the lack of electrical capacity in the local grid. The requirement for the delivery of a 7kw charger is enshrined in Condition 10 of the extant planning consent (20/P/00197). There is no change in the number of car parking spaces (9 spaces including at least 1 EV charging point) to be provided.

A Public Path Diversion Order (Ref: ROW/3310143M) was approved on 26th October 2023 for the diversion of the public footpath which runs through the site to allow for the development of the allotments.

The County Highway Authority has advised that it has no objection to the proposed amendments subject to a number of conditions including the provision of additional dropped kerbs and cycle parking. The additional dropped kerbs are considered justified given that since the existing consent was granted, SCC have adopted LTP4 (2022) and SCC's Healthy Streets (2023) policies which place a far greater emphasis on pedestrian accessibility and promoting active travel. The County Highway Authority is satisfied with the proposed number of cycle parking spaces provided but require that e-bike charging is required. The CHA would be satisfied with a timed three-pin socket to serve the 6 Sheffield stands proposed. The reduction in the EV charger capacity is acceptable and will be reflected in the wording of the planning condition.

The risk of crime and anti-social behaviour

The application site is not overlooked by residential properties, and it has been acknowledged that there would be an increased risk of crime and anti-social behaviour due to the site's location. This was considered by the Committee when the previous application was approved and a condition was applied which required the submission and approval of a scheme for the reduction of opportunities for crime including details to be implemented such as locks, lighting and CCTV.

The Guildford Allotments Society has raised concerns that the revised building location materially obstructs the line of sight between plots and the entrance, which was a security feature of the original plan. As discussed elsewhere in this report, the revised location of the building has been necessitated by changes to the site boundary and site constraints. Whilst the concerns of the GAS are acknowledged, it is considered that these can be addressed through the implementation of a detailed scheme for the reduction of opportunities for crime which should be prepared in consultation with the GAS. As in the case of the previous application, an appropriate condition is therefore proposed.

Conclusions

Planning permission was granted for the North Moors Allotment site in October 2020 and the principle of development has therefore been established. The development has commenced under the extant consent and a significant amount of work has been completed. The current application seeks to formalise changes to the site boundary and layout of the allotments and design of associated facilities to enable the allotments to be completed and made available for use.

The proposal does not constitute inappropriate development in the Green Belt and would be a significant benefit to the local community supporting local and national objectives for healthy and active lifestyles.

Whilst the development necessitates the loss of semi-improved grassland, scrub, scattered (young) trees, (young) plantation woodland and tall ruderal habitat, the proposed design offers embedded mitigation, avoiding effects on features of ecological value with further measures to deliver compensation and biodiversity enhancements as set out in the previously approved Landscape and Ecology Management Plan which forms part of the current application. The Surrey Wildlife Trust has recommended that an updated ecological assessment should be undertaken prior to determination of the application. However, since the development of the site has now been substantially implemented under the extant consent and the current application relates only to the final stages of the project and the revisions are not significantly different to the approved scheme, Officers are of the view that it would be expedient for the development to be completed in accordance with the previously approved ecological assessment and Landscape and Ecological Management Plan (LEMP) as proposed by the Applicant. It is noted that site conditions may now be markedly different to the approved ecological assessment as a result of the development and the approved LEMP and there are benefits in ensuring consistency of approach. The approved LEMP provides for future management and monitoring and will secure appropriate ecological benefits on the site. The requirement for a new ecological assessment and revised LEMP at this late stage of the project could lead to delays in the completion of the allotments.

The development would not materially impact on the character of the area, residential amenity or highway safety.

Concerns have been raised by the Guildford Allotments Co-operative Society Ltd (GAS) about the revised layout and location of the allotment facilities and the attendant risk of crime/ anti- social behaviour. The Applicant advises that the proposed layout is the configuration that best delivers on these requirements whilst working within the confines of the existing Site in respect to levels, trees and landscaping which constrain the width and arc of the access track to the east and the rationale for this is accepted. The Applicant has subsequently met with the GAS to discuss the project in further detail, and this has resulted in amendments to the internal layout of the allotment facilities. A condition is also proposed which requires the submission of a written scheme for the reduction of opportunities for crime including details of locks, lighting and CCTV.

Officers are satisfied that the changes to the proposed development do not deviate from the scheme previously approved by Planning Committee at the meeting on 19th June 2020. The proposals comply with the requirements of National Policy, local plan (including the Local Plan Part 2 adopted in March 2023) For these reasons, and the reasons set out in the body of the report, the proposal is in accordance with the development plan.

Positive and Proactive Working

In determining this application, the local Planning Authority has worked with the Applicant in a positive and proactive manner based on seeking solutions to problems arising in relation to dealing with the planning application by liaising with consultees, respondents and the Applicant/agent and discussing changes to the proposal where considered appropriate or necessary. This approach has been taken positively and proactively in accordance with the requirements of the NPPF, as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015.