Application no:	2023/1359
Ward:	Weybridge Riverside Ward
Case officer:	Paul Falconer
Location:	Brooklands College Heath Road Weybridge Surrey KT13 8TT
Proposal:	Full and partial demolition of existing buildings within the Brooklands College campus, development of existing education facilities including external refurbishment and alterations of retained buildings, new and reconfigured entrances and the construction of a new three storey College building, and provision of a new sports hall and linked entrance building. Change of use of Brooklands House and the existing College Gatehouse to residential use and external works to both buildings, and the provision of residential units including provision of affordable housing, an extensive landscaping scheme including the provision of a SANG, car and cycle parking, new substations and plant, new boundary treatments and other associated works.
Applicant:	Brooklands College and CALA Homes (Thames) Ltd
Agent:	Miss Jennifer Woods Lichfields The Minster Building 21 Mincing Lane London EC3R 7AG
Decision level:	Planning Committee
Recommendation:	Grant Planning Permission subject to S106 agreement and referral to Secretary of State

Report

Description

1. The application site contains Brooklands College and comprises a mixture of brownfield and greenfield land. The site lies to the south and east of Brooklands Lane, west of Heath Road and north of the Southwest Main Line Railway which borders the south boundary of the site.

2. The site covers a total area of 27.03 hectares and is bound by dense mature woodland both within and outside the application site boundary, which serves to screen it from the adjacent roads and other surrounding development.

3. The site benefits from two main vehicle access points. The primary vehicular entrance to the site is from Heath Road. It contains one lane in each direction; however, there is a pinch point in the form of historic gates that allow only one car to pass at a time. The site can also be accessed via Brooklands Lane, which is used for servicing/deliveries.

4. The College Campus lies at the centre of the site and consists of the existing College buildings and hardstanding. There is a Grade II Listed Building, Brooklands Technical College (former Brooklands House), within the grounds of

the College. The applicant's submission refers to this building as 'Brooklands Mansion'.

5. The southern parcel comprises undeveloped land that was last used by Elmbridge Borough Council (then Walton District Council) for landfilling activity. The landfilling activities occurred around the Cricket's Hill area (the southernmost area of open space) which was given consent for disposal of household and trade refuse between 1954 to 1961. The southern parcel also contains a small area of hardstanding in the form of historic tennis courts (no longer in use) which according to the applicant's evidence has been used subsequently as a parade area by students and is situated to the immediate north of Cricket's Hill (landfill area).

6. The northern parcel comprises hardstanding, currently in use as a car park within the existing Brooklands College Site, and an undeveloped area. The majority of the car park is covered in concrete or tarmac and is in disrepair. The northern parcel was used for extensive landfilling activities between 1963 and 1968.

7. A stream is present on the site within the woodland in the south-west corner of the site that enters a drainage ditch on the western boundary.

8. The site's topography generally falls towards the west, with a 5m difference between eastern and western boundaries. There is a slight valley in the site's southwest quadrant in which the stream is located. There is a bank down to the railway on the site's southern boundary, and a bank down to the fields along the site's western boundary.

9. The closest neighbouring properties are Rogues Roost to the north of the site and the residential properties in the Lockstone Estate, at the southern end of Brooklands Lane, to the west of the site and Caenwood Close to the east of the site.

10. Heathside Secondary School lies adjacent to the northern boundary of the site. Weybridge Railway Station is located southeast of the site. Beyond Brooklands Lane to the west and north are areas of open land and woodland. The River Wey is located to the west and north of the application site with its nearest points situated approximately 250 metres to the northern and south-western boundaries of the Site. Weybridge Cemetery is also located to the north of Brooklands Lane.

Constraints

11. The relevant planning constraints are:
    - Green Belt
    - Community Facility and Employment Land Use
    - Grade II Listed Building (Brooklands House/Mansion)
    - The Hand & Spear Hotel which is adjacent to the site boundary is also Grade II Listed
    - Locally Listed Obelisk in the grounds of Brooklands College
    - Some parts of the site particularly along the existing stream are at low, medium and high risk from surface water flooding

- Contaminated Land (historic landfill sites)
- Within 5km Buffer of the Thames Basin Heaths Special Protection Area
- Adjacent to a Site of Nature Conservation Importance (SNCI) known as The Heath to the east
- Site of Special Scientific Impact (SSSI) Risk Zone
- Dumsey Meadow SSSI is located around 2.8km north of the site
- Chertsey Meads Local Nature Reserve (LNR) is approximately 2.1km to the north of the site
- Priority habitat area

Policy

12. In addition to the National Planning Policy Framework and the National Planning Practice Guidance, the following policies and guidance are relevant to the determination of this application:

National policies and guidance

- National Planning Policy for Waste 2014
- National Design Guide

Regional policies and guidance

- South East Plan 2009 Policy NRM6 - Thames Basin Heaths Special Protection Area

- Surrey Waste Local Plan (SWLP) 2019-2033
  - Policy 4 - Sustainable Construction and Waste Management in New Development
  - Policy 7 - Safeguarding
  - Policy 9 - Green Belt
  - Policy 10 - Areas suitable for development of waste management facilities
  - Policy 13 - Sustainable Design
  - Policy 14 - Protecting Communities and the Environment
  - Policy 15 - Transport and Connectivity
  - Policy 16 - Community Engagement

- Surrey County Council's Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development 2023
- Local Transport Plan 4, 2022 (LTP4, SCC)
- Travel Plan Planning Good Practice Guide (SCC)

Local policies and guidance

- Core Strategy 2011
  - CS1 – Spatial Strategy
  - CS4 – Weybridge
  - CS13 – Thames Basin Heaths Special Protection Area
  - CS14 – Green Infrastructure
  - CS15 – Biodiversity

    - CS16 – Social and Community Infrastructure
    - CS17 – Local Character, Density and Design
    - CS19 – Housing type and size
    - CS21 – Affordable housing
    - CS23 – Employment land provision
    - CS25 – Travel and Accessibility
    - CS26 – Flooding
    - CS27 – Sustainable Buildings

- Development Management Plan 2015
    - DM1 – Presumption in favour of sustainable development
    - DM2 – Design and amenity
    - DM3 – Mixed Uses
    - DM4 – Comprehensive development
    - DM5 - Pollution
    - DM6 – Landscape and trees
    - DM7 – Access and parking
    - DM8 – Refuse, recycling and external plant
    - DM9 – Social and community facilities
    - DM10 – Housing
    - DM11 – Employment
    - DM12 – Heritage
    - DM17 – Green Belt (development of new buildings)
    - DM20 – Open Space and views
    - DM21 – Nature conservation and biodiversity

- Design and Character SPD 2012
    - Companion Guide: The character of Elmbridge (an overview)
    - Companion Guide: Weybridge

- Development Contributions SPD 2021

- Flood Risk SPD 2016

- Parking SPD 2020

- Development Management Advice Note 1 - Understanding housing need
- Development Management Advice Note 2 - Optimising development land
- Development Management Advice Note 4 - Viability standards
- Development Management Advice Note 6 - First Homes
- Development Management Advice Note 7 - Supporting biodiversity and encouraging nature in development

- Draft Elmbridge Local Plan 2037
    - The draft Local Plan was submitted to the Secretary of State on 10th August 2023 and awaits examination. At this stage, it is afforded no weight.

Relevant planning history

13. The site has an extensive planning history. The most recent records are listed below.

Reference	Description	Decision
2023/1333	Listed Building Consent: Partial demolition and refurbishment of Brooklands Technical College (Brooklands House) including internal alterations associated with the change of use of the building to residential, and external alterations including the re-installation of the clock tower, cupola and roof glazed cupola to stair tower at roof level and porte-cochere doorway at ground floor level, the replacement of windows and doors, the installation of solar panels at roof level, hard and soft landscaping and other associated works.	Under consideration
2022/2327	Request for a Scoping Opinion in relation to a proposed development at Brooklands College with the enhancement of the existing education facility including provision of new sports hall and enterprise hub and a residential development of up to 350 new homes or up to 270 homes and a care home, including the conversion of Brooklands Mansion to residential apartments, with extensive landscaping, new access routes and associated works.	Scoping report satisfactory
2020/1556	Listed Building Consent: Repair works to existing entrance gate and piers.	Granted
2016/0951	All-weather floodlit sports facility comprising 4 five-a-side pitches, 4 seven-a-side pitches, part two/part single storey detached sports pavilion including reconfiguration of the car park, cycle parking, and landscaping.	Granted
2015/3680	Proposed alterations to the Locke King building including replacement glazing and flat roof, alterations to the Library including replacement roof, external yard for the storage of materials for construction based courses and fencing to new display area.	Granted
2014/3186	Internal alterations to form practical teaching areas, external ramp for disabled access including fenestration changes and external ventilation louvred grilles.	Granted
2014/2239	Renovation of an existing 3 storey college building to include: replacement of external windows and doors, renewal of flat roof, re-landscaping of garden, new decking, secure line fencing and reconfiguration of car park.	Granted
2014/2039	Listed Building Consent: Internal alterations to provide a practical teaching area for hair and beauty.	Granted

2008/1688	Listed Building Consent: Demolition of the Locke-King wings and re-siting of the gate piers.	Granted
2008/1003	Comprehensive re-development including new college buildings (13,812.4sqm), refurbishment to existing listed building and tower building and associated parking and landscaping following demolition of existing buildings (16,233.1sqm).	Granted
2007/2149	Screening opinion as to whether an Environmental Impact Assessment is required for the redevelopment of Brooklands College.	Environmental Impact Assessment Not Required

Proposal

14. Full and partial demolition of existing buildings within the Brooklands College campus, development of existing education facilities including external refurbishment and alterations of retained buildings, new and reconfigured entrances and the construction of a new three storey College building, and provision of a new sports hall and linked entrance building. Change of use of Brooklands House and the existing College Gatehouse to residential use and external works to both buildings, and the provision of residential units including provision of affordable housing, an extensive landscaping scheme including the provision of a SANG, car and cycle parking, new substations and plant, new boundary treatments and other associated works.

15. The proposed development is divided into five areas or ‘character areas’ as defined in the Design and Access Statement: 1 – College Campus; 2 – Brooklands Mansion; 3 – The Northern Parcel ‘Bamboo Grove’’; 4 – The Central Parcel ‘Meadowlands’; and 5 - The Southern Parcel ‘Crickets Hill’. These are shown in figure 1 below.

Development character areas

16. During the course of the application, 21 days re-consultation was carried out for the following amendments and updated or additional information:
    - Document list clarifying new and updated documents and plans submitted
    - Updated Green Belt Assessment – to reflect correct number of trees
    - Amended arboricultural information to address the Council's Tree Officer's objections and comments
    - Updated Daylight and Sunlight report correcting inaccuracies
    - Updated remediation strategy addressing the comments from the Environmental Health Officer
    - Updated drainage report to address comments from Surrey County Council
    - Updated highways information to address comments from Surrey County Council
    - Updated ecology information to address the comments from consultees (incl. Surrey Wildlife Trust, Surrey bat Group and Campaign to protect Rural England)
    - Updated landscape drawings to update the boundary treatment specifications and remove the greyed out area of the Air Cadets Site (TBC)
    - Updated and additional plans in relation to the Listed Building for this planning application and accompanying Listed Building Consent application 2023/1333 correcting inaccuracies and providing clarification in regards to the skirting boards and radiators
    - Additional site sections
    - Block A ground floor redesign

- Material palette and proposed window character information
- Block B lift overrun corrected
- Changes to the internal arrangement of the Sports Hall to address the comments from Sport England
- Updated proposed site ground floor plan
- Updated windows on the internal courtyard elevations of Block D and E and additional surveillance diagrams
- Response from PRP re passive surveillance
- New plans detailing separation distances
- New plans detailing parking allocation plan and density calculations and residential area measure
- Changes to the colour of the cladding on the Tower building

17. Following this amendments, the size of the SANG has been reduced from 12ha to 9.95ha in response to the NE's objection. Additional plans and documents have also been received to address other consultees' comments or provide clarifications. Given the nature of this information, only the relevant consultees were consulted directly; other parties were not considered relevant for re-consultation.

Consultations

18. EBC Asset Management – Following receipt of clarification, raised no objection.

19. EBC Environmental Health Officer (Contaminated Land) – Following the receipt of additional information, raised no objection subject to conditions.

20. EBC Environmental Health Officer (Noise & Pollution) – No objection subject to conditions.

21. SCC SUDs – Following the receipt of additional information, raised no objection subject to conditions.

22. Surrey Police – No objection, relevant conditions and recommendations have been suggested.

23. EBC Housing – Support the on-site affordable housing provision.

24. Environment Agency – No objection subject to conditions.

25. Surrey Bat Group – Object - bat surveys and assessment not carried out in accordance with guidance.

26. Surrey Wildlife Trust – Object – bat surveys and assessment not carried out in accordance with guidance.

27. Affinity Water - No comments to make.

28. Thames Water - Thames Water has identified an inability of the existing foul water network infrastructure to accommodate the needs of this development proposal. The application indicates that surface water will not be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

29. Joint Waste Solutions – Required amendments to the bin store of the shared ownership part in Block F due to the dragging distance exceeding 10m. This has been changed by the applicant whereby these flats would each have their own bin allocation and would need to present them to the kerbside for collection. JWS did not raise other concerns.

30. Natural England – Do not raise an objection to the proposed development due to the TBH SPA mitigation being secure through CIL and SAMM contributions. However, NE would raise an objection to any future planning application seeking to use the Brooklands College SANG as Thames Basin Heaths mitigation. There is currently insufficient information to enable certainty that the SANG coming forward with this application would be effective in ensuring no adverse effects on integrity arising from recreational impacts to Thames Basin Heaths SPA from residential development.

31. SCC Minerals and Waste – No objection subject to a relevant condition and the Council being satisfied that the development includes adequate facilities for waste storage and recycling, and that adequate controls exist to ensure that waste storage and recycling is maintained and managed for the life of the development.

32. SCC Rights of Way Officer - No response.

33. Health & Safety Executive – The application does not fall under the remit of planning gateway one because the height condition of a relevant building is not met.

34. Active Travel England – do not wish to comment on planning applications validated prior to 01/06/23.

35. NatureSpace Partnership – The applicant has not surveyed the two ponds within 500m of the site, so the status of these ponds is currently unknown. Should great crested newts be present in these nearby ponds they may well use the site during their terrestrial dispersal phase as the woodland on site would provide suitable foraging habitat. There is also a ditch on site within the woodland, if it holds water at times, it could also support great crested newts in surrounding habitat. Therefore, a condition is recommended securing reasonable avoidance measures.

36. Runnymede Borough Council – No objection.

37. SCC Education, Planning & Development – No comments received.

38. Woking Borough Council – No objection.

39. EBC Greenspaces - No comments received.

40. Historic England – Do not offer advice and suggest that the Council seeks the views of its specialist conservation and archaeological advisers.

41. Network Rail – No objection subject to a pre-commencement condition.

42. Sport England – Initially required amendments. Following the receipt of amended plans, raised no objection subject to a condition.

43. SCC Transport and Development – No objection subject to conditions, informatives and obligations to be secured by way of a s106 agreement.

44. EBC Tree Officer – Object due to unacceptable arboricultural impact including the loss of mature high value trees which have the potential to become veteran and local champion trees. Most of the trees identified for removal are on the periphery of the site which could be avoided through good design. Demolition of structures required within retained trees RPAs, particularly T131-135 and T39, T36 which could result in damage to valuable trees identified for retention. Lack of detail in the arboricultural report relating to services and the impact on retained trees and their root systems. Pruning of retained trees should be avoided or limited to minimise the impact on the health and form of retained trees. The proposal included 474 new trees which include a good mix of sizes and species.

45. SCC Historic Environmental Planning – No objection subject to a condition.

46. SCC Environmental & Infrastructure (Planning) - No response.

Representations

47. 82 neighbouring properties have been consulted on this application. Four site notices were also displayed around the application site advertising the application.

48. 22 letters of objection have been received from 20 addresses. 9 letters of representation neither objecting to or supporting the proposal have been received from 7 addresses. 236 letters of support have been received from 219 addresses. The contents of these letters have been summarised in accordance with the topics below.

49. It is noted that most of the support letters have been received from the same email address as part of the Just Build Homes initiative. It is also noted that the support letters feature addresses outside the borough.

50. The following **objections** have been raised:
    - Object to the housing

- Near to protected heath land that has already been reduced
- Increase in traffic/congestion
- Impact on local wildlife e.g. Great Crested Newts, bats, birds, slow worms, deer
- Encroachment into Heath land
- More parking required
- Increase in vehicular movements
- Lack of infrastructure – doctors, schools, hospitals won't be able to cope
- Brooklands Road, Heath Road and Hanger Hill already too busy
- Should not be determined until Fraud investigated
- Impact on residential amenity
- Loss of privacy
- Light and noise pollution
- Insufficient time to comment
- Unclear if this app supersedes or supplements the 2023/1333 application
- Three way intersection at Heath Road/Brooklands College /Old Heath Road will become more difficult for pedestrians with increased traffic
- Heavy construction traffic will damage traffic island and endanger pedestrians
- Impact on pedestrians and cyclists
- Travel plan only cites 8 accidents which is misleading as station roundabout and Brooklands Lane intersection require extreme care and are dangerous – dangerous conditions are not measured by accident rates and will be exacerbated by heavy traffic
- The Interim Residential Travel Plan must not allow any HGV traffic on Old Heath Road. (Note that the plan does not propose the use of Old Heath Road but it does not specifically exclude it).
- The site plan proposes open access to the site via a pedestrian/cycle track behind the Veterinary Clinic and Tudor House. This accessway is currently locked and has not been in use for several years. What are the developers proposing for the secure use of this new route including landscaping, fencing and lighting?
- Impact on Green Belt
- Negative impact on the Grade II Listed building and its setting
- Impact on TPO trees
- Impact on Thames Heaths Special Protection Area/SSSI
- Information provided is insufficient – documents concerning bats are insufficient – BCT survey guidelines ignored, no management company agreed to maintain the SANGS, document concerning Reasonable Avoidance Measures is requested, further info on the proposed water drainage system is required as current proposals do not meet NPPF, PPG and technical standards for suds
- No response from Affinity water
- Risk of surface water flooding
- Common land/designed open green space may be damaged during works and increased usage by additional occupants and pets
- Impact on wildlife from light pollution

- Not provided sufficient biodiversity replacement of equivalent or better quality
- Increase air pollution and reduce air quality
- Will not reduce carbon dioxide emissions
- Environmentally sensitive site – impact on flora, fauna
- Impact on openness
- Impact on the amenity of the area
- Housing won't be affordable
- Insufficient information to assess impact on Thames Basin Heath Special Protection Area
- Developer claims the college's financial situation (debt of £25m) is a very special circumstance but will still leave a £5m shortfall
- Development does not fall within the exceptions set out in national policy, is inappropriate and the harm is not outweighed by other considerations
- Very special circumstances do not outweigh the harm to the green belt
- Contrary to planning policy
- Application has been poorly advertised/notified – no yellow site notice on the gates of the college – a single lamp post on Heath Road seems to be the only local notification
- Fails to pick up on local planning cues e.g. terraced housing in Waverley Road and Brooklands Lane and the town houses in Elgin Road and Coniston Court
- No one or two bedroom 'starter homes' with outside space
- Previous waste disposal and land fill site – no details of how site is to be capped to minimise risk of liquid and vapour emissions
- No shops nearby
- Obvious wildlife corridors not recognised - path or corridor needs to be provided
- between the housing in Caenwood Close and the back gardens of proposed plots H10H and H11H, also a green route between or around the housing in Plots H14H to H22H
- Community use of sports hall – missed opportunities for integration and sharing between resident and Brooklands College students/staff
- No outside space for a range of interests and age groups from the college and for residents (that should follow through from the granted planning application 2016/0951)
- The Construction Plan currently makes no reference to training and apprenticeships for the building trades
- Further opportunity for service and training– through provision of garden plots or allotments for rental, for woodland/landscape management - with on-site facilities and equipment for tree surgery, ditching/ hedging/ fencing, for bicycle maintenance and repair for cycles
- Further safety assessments are needed on the plan to re-open vehicular access to Brooklands College from Brooklands Lane.
- The Locke King Family donated the grounds on the condition that its used for educational purposes – this goes against this
- Impact on access
- Weybridge already at capacity for homes

- Station/trains already busy – will add additional stress/pressure on these services
- Paths in forest will be used for anti-social behaviour
- Green space would be better used for public health or wellbeing – out door gym or running track on existing football pitch would be better
- Football pitch should not be built on
- Previous planning permission for the football pitch denied due to migratory paths of the bats
- Debt information only published after planning application announced
- Money for Brooklands College will not go that far
- Screening needs to be kept between the southern Tudor House property and the pedestrian/cycle accessway

51. The following **comments** have been made:
    - Location of buildings under a different postcode to the college address
    - Opportunity to reroute traffic to Heathside school whilst houses built
    - Should include pedestrian access to Heathside school so that children do not need to walk down Brooklands Lane

52. The following **benefits** have been noted:
    - Providing better/upgrading teaching facilities
    - New homes
    - Affordable homes
    - Benefit to community/students
    - Open land/better use of green space
    - College is good for additional needs/engineering/STEM subjects
    - Area/college needs regeneration/refurbishment – this is an improvement
    - Improve education and wellbeing
    - Opportunity for students to be involved
    - Will ensure college is here in years to come
    - Much needed local SEND provision and investment
    - Will meet industry expectations and requirements
    - Will help the college to improve the curriculum in the future
    - Need for housing in the area/contribute to housing need
    - Will give public access to large woodland
    - Future of college at stake and impact on education, SEND and jobs
    - Will give opportunity for those who work/study there to live there
    - Heritage of the area is important
    - Improving sport and recreational facilities
    - Will generate funds to repay the money owed to DfE
    - Benefits of the proposal exceeds the NPPF VSC test
    - Reduced carbon footprint
    - Safe and well-lit pathway for students – will relieve congestion
    - Cycle store will encourage cycling to school
    - CCTV agreed
    - Will return mansion to historic residential use and secure its maintenance and upkeep for the future
    - New sports centre

Positive and proactive engagement

53. The National Planning Policy Framework requires local planning authorities to work with the applicant in a positive and proactive manner to resolve problems before the application is submitted and to foster the delivery of sustainable development. This requirement is met within Elmbridge through the availability of pre-application advice.

54. Formal pre-application advice (ref. 2021/3728) was sought by the applicant prior to the submission of this application through a Planning Performance Agreement (PPA). It included extensive pre-application discussions, 14 pre-application meetings (including a site visit), two reviews by the Design Review Panel and a meeting with the Council's validation officer to cover the submission requirements.

55. The applicant had also separately engaged with Surrey County Highways, the Lead Local Flood Authority, Surrey Police (Secured by Design) and Natural England prior to submission of this application.

56. The current application was publicised in accordance with Articles 15 and 16 of The Town and County Planning (Development Management Procedure) (England) Order 2015 (as amended). The Council sent letters inviting comments to a total of 82 neighbouring properties in the vicinity of the application site. Four site notices were also displayed around the site and notices were advertised in the press as part of the public consultation.

57. A full 21 days re-consultation was carried out for the first set of amended plans and information. Following this, relevant consultees were re-consulted on technical matters and clarifications. Other updated plans comprised clarifications and amendments to the scheme.

58. Only Natural England (NE) were re-consulted with regards to the changes to the SANG from 12ha to 9.95ha. Given the technical nature of this change, other parties were not considered relevant for re-consultation.

59. The application is accompanied by a Statement of Community Involvement, which sets outs that prior to the submission of this application two public consultations were carried out. The first public consultation took place between June 2022 and July 2022, and the second public consultation took place between October 2022 and November 2022. These included:
    - Local press coverage and two consultation leaflets delivered to a combined total of 2,030 residential and business addresses.
    - Two in-person public exhibitions
    - A dedicated project website with 4,395 visits from 1,407 unique visitors and two virtual online exhibitions with 3,000 visits.
    - 1-2-1 meetings with stakeholders including Elmbridge Borough Councillors, Lockestone Close Residents Association, local schools and community groups, college staff and students.
    - Inviting residents and stakeholders to submit feedback on the proposals via email, printed feedback forms and online feedback forms.

- 55 individual pieces of feedback received (online and hard copy) and by email over both public consultations.

60. Details of engagement with stakeholders, feedback summary and the applicant's response to the matters raised are included in the SCI. The following changes have been implemented in response to the feedback:
    - improving public access to the new college facilities;
    - reducing the number of homes from 350 to 320;
    - reducing the number of apartment blocks next to Brooklands Mansion;
    - moving development further away from the Mansion
    - removing plans for a new Care Home from the proposals;
    - improving pedestrian linkages through the site;
    - a new 9.95ha SANG within a maintained woodland.

Planning considerations

61. The main planning considerations in the determination of this proposal are:

- EIA Development
- The principle of development
    - Redevelopment of the College
        - The condition of existing facilities
        - The reduction in size of the College
        - Refurbishment and enhancement of the College facilities
        - Future growth
        - Ashford campus
        - Legacy ESFA debt
        - SEND and ASD facilities
    - Provision of new housing
- The impact on the Green Belt
    - Planning Policy and case law background
    - Purposes of including land within the Green Belt
    - The impact of the proposal on the Green Belt, its openness and purposes
        - Spatial Openness
        - Visual Openness
        - Effect on the purposes of including land within the Green Belt
    - Conclusion on Green Belt
- Affordable housing and viability
- Housing mix, density and need
- The impact on designated and non-designated heritage assets
- Archaeological implications
- Design considerations
- Impact on neighbouring amenity
- Quality of proposed residential accommodation
    - Minimum space standards
    - Outlook and overlooking

    - Daylight and sunlight to habitable rooms
    - Outdoor amenity area
    - Conclusion on the quality of proposed residential accommodation
- Impact on safety, highways and parking
    - Vehicular access
    - Pedestrian and cycle links
    - Parking provision
        - Parking provision for the College including Sports Hall/Community Hub
        - Parking provision for residential units
        - Parking provision for the SANG
        - Car Club
    - Cycle store provision
    - Impact on the highway safety and network capacity
    - Travel plans
    - On-site and off-site highway improvements and contributions
    - Conclusion on safety, highways and parking
- Impact on trees
- The impact on ecology and biodiversity
- Ecology
    - The impact on the designated sites and trees
    - Bats
    - Bat mitigation, compensation and enhancement
    - Reptiles
    - Hazel dorm house
    - Great Crested Newts
    - Biodiversity enhancement
- The impact on Thames Basin Heaths Special Protection Area
- Suitable Alternative Natural Greenspace (SANG)
- Impact on flood risk and SuDS
- Pollution
    - Land contamination
    - Air quality
    - Noise and vibration
    - Light pollution
    - Waste management
    - Utilities
- Fire safety
- Renewable energy and energy conservation
- Socio-economic impacts
- Phasing
- Financial considerations
- Planning Obligations
- Planning balance and a case for potential ‘Very Special Circumstances’ (VSCs)

EIA Development

62. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 determines whether there is a requirement for an Environmental Impact Assessment (EIA) based on whether the development in question is an EIA development, as defined by the 2017 Regulations. This proposal comprises an urban development project which would include more than 150 dwellings. Therefore, the proposal falls within category 10 (b)(ii) of Schedule 2. The potential for likely significant environmental effects as a result of the proposed development cannot be entirely ruled out. On this basis, the applicant has undertaken an EIA and has submitted an Environmental Statement (ES) as part of this planning application. The ES provides an important part of the environmental information that the Local Planning Authority must consider in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 when determining the planning application. It informs the decision maker of the likely significant environmental effects of the proposed development, both during construction and on completion, and in combination with other nearby development and identifies any measures to prevent, reduce or offset any significant effects on the environment, along with representations from consultation bodies and the public.

63. The applicant has submitted an ES, which follows the request for a Scoping Opinion processed under application 2022/2327. A copy of the EIA Scoping Report is supplied in ES Appendix B1 and, a copy of the Council's Scoping Opinion is supplied in ES Appendix B2.

64. Together with other material information and comments from statutory Consultees, these items form the environmental information which is taken into account in this Report. The ES consists of the following chapters supported by accompanying technical assessments:
    - Chapter A - Introduction and Background
    - Chapter B - Scope, Methodology and Consultation
    - Chapter C - Site and Scheme Description
    - Chapter D - Landscape and Visual Impact Assessment
    - Chapter E - Built Heritage
    - Chapter F - Ecology and Nature Conservation
    - Chapter G - Transport
    - Chapter H - Air Quality
    - Chapter I – Noise and Vibration
    - Chapter J - Flood Risk and Drainage
    - Chapter K - Ground Conditions and Contamination
    - Chapter L - Socio-Economics
    - Chapter M - Archaeology
    - Chapter N - Climate Change and Resilience
    - Chapter O - Cumulative Impact Assessment
    - Chapter P - Implementation of Mitigation and Monitoring

65. It has been found that the ES is comprehensive and of good quality. The Local Planning Authority is satisfied that the submitted Environmental Statement

complies with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and, that sufficient information has been provided for the Council to assess the environmental impact of the proposal. The environmental information contained in the ES has been considered in assessing the application and this report reflects that assessment.

The principle of development

66. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, and that the planning system has three overarching objectives:
    a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
    b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
    c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Redevelopment of the College

67. Para 93 of the NPPF sets out that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
    a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
    b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
    c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
    d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
    e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

68. Policy CS16 (Social and Community Infrastructure) seeks to ensure the provision of accessible and sustainable social and community infrastructure, the Council will work with its partners in order to:
    1. Promote the mixed use of social and community infrastructure;
    2. Resist the loss of existing social and community facilities or sites, unless it can be demonstrated that:
        - the facility is no longer needed for its original purpose or viable for any other social or community use; or
        - an alternative facility will be provided in a location with an equal level of accessibility for the population it is intended to serve,
        - there is no requirement from any other public service provider for an alternative community or social facility that could be met through a change of use or redevelopment.
    3. Ensure that any provision of social infrastructure is accessible by public transport, cycling and walking.
    4. The Council will work in partnership with Surrey County Council and independent schools to develop an action plan to meet the level of need outlined in the Surrey Education Organisation Plan(24) and the Elmbridge Education Provision Assessment through:
        - the encouragement of appropriate intensification of existing sites;
        - the identification of appropriate sites for new facilities and consolidation of existing facilities within future DPD's that address Development Management and Site Allocations ; and
        - securing financial contributions from new developments.

69. DM9 (Social and community facilities) sets out that:
    a) New development for social and community facilities will be encouraged provided that:
        i. It meets identified local need,
        ii. The site is in a sustainable location that is safe and accessible to the local community,
        iii. It will accord with the character and amenity of the area, particularly in residential areas,
        iv. It achieves a high quality design that allows for flexible use and provides inclusive access for all, and
        v. The level of parking provision and the effects on traffic movement and highway safety are acceptable.
    b) The Council will support mixed-use, shared, flexible and adaptable buildings and spaces that meet the needs of the community, subject to the above provisions, and will encourage collaboration between service providers, the community and key partners.

70. The NPPF and Policies CS23 (Employment Land Provision) and DM11 (Employment) also seek to protect employment land uses unless redevelopment for other purposes provide wider benefits to the community.
71. Brooklands College is a general further education college opened in 1951 (formerly Brooklands Technical College) with campuses located in Weybridge and Ashford. It offers vocational training and further/ higher education, providing full

and part-time education and training across twelve of the fifteen sector vocational subject areas. The College has a strong tradition for STEM based provision (Science, Engineering, Technology and Mathematics) and in particular motor sport and manufacturing, hair & beauty and construction. The College also offers a wide range of other programmes, including, Special Educational Needs & Disabilities (SEND) provision.

72. The main campus in Weybridge (2021-2022 figures) accommodates 265 staff members (227 Full Time Equivalents) (FTEs) and 2,066 students ranging from 16 years of age to adult age groups.

73. The application is supported by the following documents:
    - The College Campus Development Design and Access Statement Rev00 Issued 26th April 2023
    - Planning Statement
    - Brooklands College Strategic Plan 2021-2026 (Appendix 1 in the Planning Statement)
    - College Improvements and the Strategic Plan (Appendix 2 in the Planning Statement)
    - Maintenance Register prepared by Arcadis (Appendix 3 in the Planning Statement)
    - ESFA Repayment Agreement Extract (Appendix 4 in the Planning Statement)
    - Building Condition Summary by Fusion (Appendix 7 in the Planning Statement)
    - Space Analysis (Fusion) and Conditions Report (JLL) (Appendix 8 in the Planning Statement)

74. The planning statement sets out that the proposed development is driven by an immediate need for Brooklands College to review opportunities for sustaining its existing operation and facilities whilst planning for its future growth.

75. In 2008, permission (2008/1003) was granted for the redevelopment of the College; however, it was never implemented due to inability to attract the necessary funding as set out in the accompanying planning statement.

76. The College has to generate around £70m to deliver on its aspirations. These include resizing the College to improve efficiency, support the enhancing of the College offer by upgrading its existing campus and repay funds owed to the ESFA (discussed separately below), in order to establish its future. The planning statements sets out that without these funds, the College would become insolvent resulting in forced closure of the Campus.

The condition of existing facilities

77. The application is supported by the Building Condition Survey prepared by Arcadis (Appendix 3 in the Planning Statement) and a document prepared by Fusion (Appendix 7 in the Planning Statement) which includes a summary of the

main issues associated with each building. Overall nearly 50% of the space at Weybridge is classified as either unsatisfactory or poor (unsuitable for purpose).

78. The ESFA has granted the College £6.75m of Further Education Capital Transformation Funding (FECTF) to improve building conditions, which requires equal match funding that is to be generated from the development proposals and needs to be spent by December 2024.

79. The table below shows the condition of each building as well as what is proposed to be done with it. It can be seen that the buildings of lower grade are proposed to be demolished. All of the retained buildings are proposed to be improved.

Building	**Category (A – excellent; B – good; C – unsatisfactory; D – poor)**	**Proposal**	**Notes**
Sports Hall	A	To be demolished and reprovided	• Whilst in good condition, no longer fit for purpose • Has no connection to the commercial aspects of the College that rely on public accessibility for real work environments
Barnes Wallis	B	To be retained and improved	• There are cracks & movement joint fatigue to the internal ground floor • There are shortfalls in passive fire protection to the ground floor plant room • There is Stramit board decking which can lose structural integrity if becomes wet
Hawker	B	To be retained	• Concrete floor surfaces are subject to areas of cracks & movement joint fatigue • Lighting system is aged & predominately fluorescent
Locke King	B	Part of it (link) to be demolished and the rest retained	• There are areas of timber gutters subject to extensive decay • The cast iron hoppers & downpipes are subjected to leaks & corrosion • Projecting concrete

			window reveal liners are subject to isolated areas of crack
Studio/ The Admin Building	B	To be retained and improved	• The main roof & condition of external brickwork is in poor condition • The external wall to the north elevation is subject to partial failure • General condition of the external window & door finishes is considered life-expired, significant decay occurring to timber frames
Tower	C	To be retained	• The top floor had been taken out of use due to water damage • The existing wall cladding infill panels found to be in well-aged condition • Condition of windows & doors is life-expire with deterioration of the elemental materials
Berkley	C	To be demolished	
Concorde	C	To be demolished	
Talbot	C	To be demolished	
Wellington	C	To be demolished	
Edge	D	To be retained and improved	• There are extensive internal water ingress to all floors below the front elevation box gutter causing water damage to all internal finishes • The windows are subject to corrosion, UV degradation & significant condensation internally • External doors are dated & subject to areas of decay • The classroom interiors

			are in a poor state • Currently closed to learners due to the severe water damage that has damaged the electrical circuitry and internal finishes • The building contains the laboratory facilities for specialist science and health and social care courses • Without the proposed works to this building it cannot be used for teaching purposes
Vickers	D	To be demolished and reprovided	
Brooklands Mansion	D	To be converted to residential use	
The Air Cadets Cabin		To be demolished and reprovided	Not part of the college but proposed to be reprovided with around 120 sqm allocated to it. Currently does not form part of the proposed development.

The reduction in size of the College

80. The table below sets out the floor area that would be lost and provided as a result of the proposed development. The scheme would result in the loss of approximately 7,524 sqm.

Weybridge Estate	Building	GIA (m^2) (Current)	GIA (m^2) (Demolition)	GIA (m^2) (Change of Use)	GIA (m^2) (New-Build)	GIA (m^2) Final
Existing	Mansion	2361				
	Locke King	3136				
	Concorde	3909				
	Studio/Theatre (Admin Building)	172				
	Talbot	469				
	Edge	1569				
	Edge Outbuilding	68				
	Hawker	1013				
	Berkeley	551				
	Barnes Wallis	2275				
	Barnes Wallis Workshops	1553				
	Tower	2028				
	Wellington	471				
	Sports Hall	792				
	Existing Vickers	1608				
	Auto Motor Store	126				
	Lodge	84				
	Security Hut	30				
Demolition	Locke King Link		560			
	Concorde		3909			
	Talbot		469			
	Berkeley		551			
	Wellington		471			
	Sports Hall		792			
	Auto Motor Store		126			
	Security Hut		30			
	Existing Vickers		1608			
Change of Use	Mansion House			2361		
	Lodge			84		
New-Build	Sports Hall and Community Hub				1812	
	New Vickers				2025	
Non-College GIA	Community Hub			-400	-400	
TOTAL		**22,215**	**8516**	**2445**	**3437**	**14,691**

81. As part of the College's review including the Space Analysis carried out by Fusion and Conditions Report carried by JLL, it has been established that the current existing College floorspace (22,215 sqm within the Weybridge Campus) has an excess of floorspace with large areas of this floorspace used inefficiently and not in a manner conducive to modern teaching and training methods. The JLL report sets out that the College requires circa 13,315 sqm to deliver its expected curriculum by 2024 (which has now been outdated as the College has reviewed curriculum needs through to 2026). The JLL report also details that the College needs to rationalise and resize its accommodation to an efficient level to save on running and maintenance costs, planned maintenance costs and to create a more flexible environment that can accommodate the changing requirements of further education.

82. The College sets out that it has a space range need between 12,069 sqm and 14,787 sqm based on the Guided Learning Hours (GLH), which are the total amount of learning hours that students will receive in any one academic year. These are actual teaching contact hours, be it within a classroom or workshop environment. The amount of guided learning hours will differ by course, whether the learner is full or part time and by age group and qualification. The space

calculation is defined by the DfE guidance on the management of floorspace and is a rigid calculation. To calculate space in accordance with the Guidance on floorspace management, the total college guided learning hours are taken and divided by 1440. This is the total amount of available taught hours in any one academic year that a learner can receive. This figure is then multiplied by a space range of between 11.5m2 to 14.5m2 per workspace (essentially per learner). The space range is then enhanced by the addition of 1,650m2 under the space guidance as a 'large space' allowance. The resultant space range for the college using the projected guided learning hours is between 12,069m2 and 14,787m2. Essentially, 12,069m2 is at 11.5m2 the lower portion of the accepted space range and 14,787m2 is at 14.5m2, the upper half of the space range. The College must be within 14,787m2 (at 14.5m2 per workspace) to achieve both capital funding and also to comply with the terms of the repayment agreement. The college proposal is a floor area of 15,151m2 including 400m2 for the community hub. The community hub will be non-college space, and thus the total college area is 15,151m2 less 400m2 = 14,751m2 and therefore within the upper space range figures of 14,787m2.

Refurbishment and enhancement of the College facilities

83. The proposal seeks to replace and upgrade the existing facilities as well as provide the following new facilities:

- A new forensic teaching laboratory where crime scenes can be recreated physically and
- virtually;
- A model A&E medical reception area;
- A teaching nursery (with VR capability);
- A learning (discovery) laboratory;
- Cyber security teaching laboratory;
- Electrical vehicle servicing teaching unit;
- A dedicated unit for 14-16 year olds;
- High needs ADC unit for 60 students (funded by SCC);
- A New Restaurant, Hair and Beauty facility (including message) which is accessible to the public;
- A sports hall and gym that can be used by the public when not used by
- students/College;
- A Community Hub; and
- A Parade Ground for use by local uniformed volunteer and youth groups.

84. The proposal also seeks to:

- Consolidate the educational accommodation to one clearly defined campus;
- Pedestrianise the site removing vehicular access through the centre of the site;

- Create a new main quad to perform as the external social hub of the campus;
- Introduce a new secure boundary that utilise building lines and fences
- Unifying the appearance of the college through new construction and façade overhaul of the Tower Building; and
- Create a new main entrance, visible from the primary access point to the site.

85. There will be no access permitted onto the campus for unauthorised personnel for safeguarding reasons. However, the following areas would have controlled access from outside of the secure line for the integration of the College and community and members of the public to benefit from the College's service offerings:

    - The hair salon, The Barnes Wallis Building, First Floor;
    - The Beauty Salons, The Barnes Wallis Building, First and Second Floor;
    - Brooks Restaurant, The Barnes Wallis Building, Second Floor;
    - Exhibition Space, The Barnes Wallis Building, First Floor;
    - Main Hall, The Locke King building, ground Floor (for events, potential community hire/use and performances);
    - Sports Hall;
    - Public/Community hub (free access).

Future growth

86. The College sets out that the reduction in floor area as set out above would enable them to run the College in a more efficient and cost effective manner and would be sufficient for the existing College activities and the targeted future growth set out in their Strategic Plan. It is calculated as an average of 6% of income surplus per year over the five year period.

87. The submitted Planning Statement sets out that the College would be able to accommodate an additional 18% growth in learner numbers within the proposed space range by way of increasing space utilisation within the rooms based on the Guided Learning Hours (GLH).

88. The Studio Theatre building could accommodate a further 4% in learner number growth, which is currently occupied by staff, who could be relocated.

89. The Planning Statement also sets out that in the future the Hawker building could be expanded by construction of additional storeys, which would provide another 14% in student learner number potential. The College's ten year plan includes the replacement of this building to respond to future growth and demand. It is envisaged that a three storey building could be provided with floor area of 2,500 sqm. However, at this stage this cannot be taken into account as it relies on hypothetical expansion that would need separate planning permission and would need to be balanced against the harm to the Green Belt.

90. Other expansion options in the long term include addition of a floor over the existing workshop spaces and erection of a new building to the west of the campus (part of staff car park). Again, these cannot be taken into account as these options would need separate planning permission and would need to be balanced against the harm to the Green Belt.

91. Therefore, as per the information submitted by the College, it would be able to accommodate a 22% increase in student numbers by increasing space utilisation within the proposed floor area.

Ashford campus

92. The submitted information sets out that the College has 600 sqm of spare capacity at its Ashford campus. In the College's Strategic Plan this is proposed to be used to respond to an increased demand for adult training at this campus. The applicant also set out that the College recently applied for a grant to develop spare capacity so the centre can service the increased training for electricians employed in the electrical construction industry. The Ashford campus provides vocational courses not available at the Weybridge Campus and so any partial decanting of Brooklands students to Ashford is not considered feasible by the applicant.

Legacy Education & Skills Funding Agency (ESFA) debt

93. The submitted Planning Statement sets out that in addition to the need to upgrade, right size and refurbish existing College facilities, the College has a significant legacy debt of £25million (£24.5m repayment funds and £0.5m in costs and interest) which is required to be repaid to the Education and Skills Funding Agency (ESFA).

94. The legacy debt and financial challenges the College has faced over the last 4 years have been the result of previous funding it received having to be repaid because two College subcontractors did not comply with funding regulations. This could have led to the College becoming insolvent and closing. However, Governors have negotiated a three year period with the ESFA, during which it can dispose of surplus land and buildings to generate funds to both repay most of the debt owed and also fund the right sizing and refurbishment of its Weybridge Campus.

95. The planned disposal of surplus land and buildings is sought to generate sufficient funds along with other grants and investment (estimated at £70m) to both fund the Weybridge Campus transformation and repay £20m of the debt to the ESFA. Of this amount, £40m of this is the land sale receipts that are conditional on acquiring planning permission for a residential development. Following the repayment of this debt, a remaining loan repayment of £5million would stand, negotiated to ensure the repayments are sustainable. The repayment of this loan is not due until an existing loan is repaid (in 2032) and its repayments are equivalent to an existing loan the College has. In addition to the funds generated from the disposal of surplus land and buildings (£45m), match funding from the Further Education Capital Transformation Fund (FECTF) and

Surrey County Council would help deliver a resized and refurbished campus for the College. These are detailed in the table below.

Benefits for the College	Amount
Land sale price	£40m (£20m repaid to ESFA)
New Vickers (SEND provisions) funding from Cala	£6.195m
New Vickers (SEND provisions) funding from SCC	£5.9m
Capital funding from the FECTF	£6.75m
New Sports Hall, Community Hub, New College entrance funding from Cala	£5m
Other benefits from Cala (such as apprenticeships)	£250K (£50K/year over 5 years)
Total payments from Cala	£51.445m
Total payments from other sources (SCC and FECTF)	£12.65m
Total payments	£64.095m
ESFA loan retained as part of the ESFA repayment agreement	£5m

96. Paragraphs 7.79 to 7.83 of the Planning Statement set out the College's attempts to explore other options to prevent the closure of the College. The conclusion was that without the sale of excess land for residential development, the College, which is the only further education College in the Borough, would be in an insolvent position, which could result in a forced closure and a land sale to repay the ESFA debt. A letter has been received by the Council from the ESFA confirming the above position.

SEND and ASD facilities

97. There are currently 130 Special Educational Needs and Disabilities (SEND) learners situated in the existing Vickers building. The High Needs learners are either enrolled onto courses in SEND and /or in the wider college. Broadly, there are 68 High Needs learners on courses in the wider college.

98. Autistic spectrum disorder (ASD) is a specialist area of provision. There are a number of learners with ASD needs in SEND (included in the above number) and in the wider college.

99. The proposal is to demolish the building and reprovide it within the consolidation College campus. It is noted that the current Vickers building is of D (poor) grade and has a floor area of approximately 1608sqm. The Planning Statement sets out that the existing building is not fit for purpose for a number of reasons including the lack of security of students, suitable access for SEND and ASD students and the condition of the building.

100. The new Vickers building would be 3 storeys in height with a floor area of approximately 2,025sqm. The ground and first floors of the building would be funded by Cala and the second floor would be funded by SCC. The proposal seeks to also improve access to the building and provide a dedicated and defined garden for the students.

101. The new Vickers building would have a capacity to accommodate a maximum 200 learners. The additional floor in the Vickers building funded by the SCC would provide further accommodation for a maximum of 60 learners (particularly for students with ASD).

102. The submitted Planning Statement at Appendix 9 is accompanied by a Needs Analysis prepared by SCC that details the plans for additional SEND places and sustainability of mainstream places at Brooklands College. The document sets out that the proposal at Brooklands College to provide additional places for pupils with additional needs and disabilities is business critical to ensure the projected demand for ASD-designated specialist school places from local pupils in Elmbridge and the surrounding area is realised. There is a clearly established need for additional specialist and mainstream post 16 places in Elmbridge. SCC set out that the proposed development would meet projected demand in the medium to long term in Elmbridge and is ideally located with good transport links. SCC consider that the development supports and is aligned with Surrey's All Age Autism Strategy and Surrey's SEND Capital Strategy to ensure delivery of sufficient ASD-designated specialist school places and realisation of strategic priorities by 2023.

Provision of new housing

103. The Core Strategy indicates that there is scope for residential development through the redevelopment of existing sites with well-designed schemes that integrate with and enhance the local character. New development is required to deliver high quality design, which maximises the efficient use of land and which responds to the positive features of individual locations; integrating sensitively with locally distinct townscape while protecting the amenities of those living in the area. Innovative contemporary design that embraces sustainability and improves local character will be supported.

104. Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development. […]

> For decision-taking this means:
> c) approving development proposals that accord with an up-to-date development plan without delay; or
> d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
>
> > i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

105. The Council does not benefit from a 5-year housing land supply required by Section 5 of the Framework and as a result paragraph 11 sub-paragraph d) of the NPPF is engaged as per footnote 8[1]. It is therefore then necessary to turn to sub-paragraphs d)i. and d)ii. The application site is within the Green Belt, contains a designated heritage asset and is affected by policies relating to sites protected under the Birds and Habitats Directives (Thames Basin Heath SPA), which are recognised in footnote 7[2] as being the areas or assets of particular importance that should be protected in sub-paragraph d)i. It shall be considered below whether the application of the policies in the NPPF relating to Green Belt, designated heritage asset or Thames Basin Heath SPA provide a clear reason for refusing the development proposed. Likewise it shall be explored in the report whether any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, as per sub-paragraph d)ii.

The impact on the Green Belt

Planning Policy and case law background

106. The NPPF is clear that the Government attaches great importance to Green Belt. 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.

107. Paragraph 147 of the NPPF sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

108. Core Strategy 2011 describes the Green Belt as an environmental asset that is not only highly valued locally, but also has a much greater strategic significance. The Green Belt straddles the boundary with several adjoining boroughs, which are all committed to its continued protection and enhancement.

109. Policy CS1 (Spatial Strategy) sets out that:
- The Borough's green infrastructure network, including the Green Belt and other open spaces within the urban area, will continue to be a key determinant in shaping settlements and development patterns in the future.

[1] This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

[2] The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

The multi-functional role of the network will continue to be protected and enhanced and the Council will work with partners to manage and expand sustainable networks of accessible green space and corridors to, and through, the urban area.

- New development will be directed towards previously developed land within the existing built-up areas, taking account of the relative flood risk of available sites, and the potential impact on Thames Basin Heaths. Location, use and scale will need to take account of the existing characteristics, role and function of individual settlements and sites; access to existing or committed services and infrastructure; and the availability of developable land.

110. Paragraph 149 of the NPPF confirms that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

a) buildings for agriculture and forestry;
b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
e) limited infilling in villages;
f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
    - not have a greater impact on the openness of the Green Belt than the existing development; or
    - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

111. The NPPF defines ‘previously developed land’ as land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

112. Paragraph 150 of the NPPF sets out that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

a) mineral extraction;
b) engineering operations;
c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
d) the re-use of buildings provided that the buildings are of permanent and substantial construction;
e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
f) development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

113. Policies DM17 (Green Belt; development of new buildings) and DM18 (Green Belt; development of existing buildings) echo the above requirements. Policy DM17 sets out that proposals for a limited infilling or partial or complete redevelopment of previously developed sites would be considered in light of the size, height, type, layout and impact of existing buildings, structures and hardstanding, together with the degree of dispersal throughout the site of existing and proposed development.

114. The supporting text for Policy DM17 clarifies that consideration will be given on a case-by-case basis, recognising that new development should not have a greater impact on the openness of the Green Belt. As such, careful assessment of the impact of existing buildings and structures in comparison to new development is required. For example, an existing area of hard standing can be regarded as 'development' but its impact on openness is significantly less than a proposed building. Applicants are encouraged to take the opportunity to make improvements to the openness of the Green Belt where possible, which could include focusing development in a less conspicuous or open part of the site or removing a sprawl of buildings in favour of a single, cohesive development that leaves the remainder of the site open.

115. Paragraph: 001 Reference ID: 64-001-20190722 (revision 22/07/2019) of the NPPG sets out that assessing the impact of a proposal on the , where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

116. The NPPG identifies that the decisions of courts assist the LPAs in determination of proposals in the Green Belts. The openness is defined in the case law as the absence of development[3]; and the absence of any form of development, not only operational development[4]. The concept of 'openness' is not limited to the volumetric approach. It is relevant to consider how built-up the Green Belt is now and how built-up it would be if redevelopment occurs (volumetric matters could be one of the material considerations to establish this)[5]. Having regard to the policy as a whole, it is for the decision maker to decide, which factors are relevant to the assessment of the development's impact on the openness of the Green Belt on a case-by-case basis[6]. The case law also confirms that development that is not 'inappropriate' in the Green Belt (development identified as an exception to inappropriate development) should not be regarded as harmful either to the openness of the Green Belt or the purposes of including land in the Green Belt.[7]

Purposes of including land within the Green Belt

117. Paragraph 138 of the NPPF sets out that Green Belt serves five purposes:
- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

118. The Council commissioned a Green Belt Boundary Review[8] (GBBR) in 2016 as part of the evidence base works associated with the preparation of the new Local Plan. The Review was concerned with all Green Belt land, as defined in the current Local Plan, and the non-Green Belt land that might be considered for inclusion in the Green Belt, in order to establish their role in fulfilling the purposes for their designation. In accordance with the national policy, Green Belts intend to serve five purposes as set out above, for which they are designated. Whilst some landscape elements are used in the GBBR to, for example establish boundaries of specific parcels of land, the landscape quality is not the reason for a Green Belt designation.

119. It is noted that the Applicant relies upon the GBBR 2016 and the follow up reviews produced by Arup on behalf of the Council. It should be noted that these reports were produced to inform the drafting of the new Local Plan and as highlighted, and still valid, by the Inspector for the Sandown Park appeal (local reference 2019/0551 and appeal reference APP/K3605/W/20/3249790) at paragraph 136 "The Arup reports have yet to be tested in the Local Plan process. They are subject to objections and have no status or weight for development control purposes or in policy terms." In addition, the reviews were commissioned

[3] R (Lee Valley Regional Park Authority) v Epping Forrest DC [2016]
[4] Turner [2015] EWHC 2728 (Admin)
[5] Turner [2016] EWCA Civ 466
[6] R Samuel Smith Old Brewery (Tadcaster) (An Unlimited Company), Oxton Farm (An Unlimited Company) v North Yorkshire County Council [2017]
[7] R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404
[8] Green Belt Boundary Review methodology and Assessment Issue Rev C 14 March 2016 prepared by ARUP

to inform the Draft Local Plan and it was for the Council to determine if the recommendations in the Reviews are to be followed as part of the preparation of the Draft Local Plan. The Draft Local Plan, submitted to the Planning Inspectorate for examination in August 2023, does not propose any amendments to the Green Belt boundary. Additionally, as the reviews were carried out by an external company for the purposes of reviewing the Green Belt boundaries their conclusions, whilst useful and relevant to any application for development in the Green Belt, are not binding for the purposes of determining the applications and the Council as well as the Applicants are able to reach different conclusions. It is important to note that the overall soundness of the Reviews is a matter for the examination of the Draft Local Plan.

120. The nationally set purposes for inclusion of land within the Green Belt together with their assessment as established in the GBBR are set out in the table below:

Purpose	Assessment of purpose in Elmbridge
1. To check unrestricted sprawl of large built-up areas	The original strategic purpose of the Metropolitan Green Belt was to check the sprawl of London. However, given only part of Elmbridge is directly adjacent to Greater London, the Review also considers the role of Local Areas in restricting the sprawl of large built-up areas across the Borough and within neighbouring local authorities. The Review adopted a definition of 'sprawl' as the outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way. The consideration was given to whether the Local Area is situated at the edge of one or more distinct large built-up areas; and the degree to which the Local Area is contained by built-form, the nature of this physical containment, the linkage to the wider Green Belt and the extent to which the edge of the built-up area has a strongly defined, regular or consistent boundary.
2. To prevent neighbouring towns merging into one another	In addition to protecting existing gaps between towns, this purpose also forms the basis for maintaining the existing settlement pattern. Given the general concentration of development outside of the Green Belt in Elmbridge, the assessment of Local Areas considered gaps between all non-Green Belt settlements. In the assessment, the Review used the following definitions: • 'Essential gaps', where development would significantly reduce the perceived or actual distance between settlements. • 'Wider gaps', where limited development may be possible without coalescence between settlements. • 'Less essential gaps', where development is likely to be possible without any risk of coalescence between settlements.

3. To assist in safeguarding the countryside from encroachment	This purpose seeks to safeguard the countryside from encroachment, or a gradual advancement of urbanising influences through physical development or land use change. The assessment considered openness and the extent to which the Green Belt can be characterised as 'countryside', thus resisting encroachment from development. Openness refers to the extent to which Green Belt land could be considered free from/absence of built development. Historic open land uses associated with the urban fringe and urban characteristics as well as the countryside include, but are not limited to, mineral working and landfill, public utilities, motorways and their intersections, educational institutions, hotels and some small areas of residential development.
4. To preserve the setting and special character of historic towns	This purpose serves to protect the setting of historic settlements by retaining the surrounding open land or by retaining the landscape context for historic centres. In practice, this purpose relates to very few settlements largely due to the pattern of modern development that often envelopes historic towns today. It was concluded that Purpose 4 was not relevant to the GBBR, given that there were considered to be no instances where historic towns/cores directly abutted the Green Belt and where the Green Belt played a functional role in the setting of such historic settlements.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Purpose 5 focuses on assisting urban regeneration through the recycling of derelict and other urban land. The amount of land within urban areas that could be developed would already have been factored in before identifying the Green Belt land. Therefore, assessment of Green Belt against this purpose was not considered to enable a distinction between Local Areas, as all Green Belt achieves the purpose to the same extent. Furthermore, there are no planned urban regeneration schemes that would have been inhibited by the Green Belt designations. At the time of the assessment and currently, Elmbridge Borough Council has not been able to meet its housing need within the existing urban areas due to a lack of identifiable sites and therefore purpose 5 does not apply.

121. Within Elmbridge, two tiers of Green Belt land were identified – strategic Green Belt areas ('Strategic Areas') and local Green Belt areas ('Local Areas'). The Strategic Areas are three broad areas identified through common landscape character, natural barriers and their functional connections within the wider Metropolitan Green Belt. Local Areas form more granular parcels that were in the

GBBR further assessed against the NPPF's purposes for their inclusion within the Green Belt.

122. The application site was identified to be located within Strategic Area B, which forms part of a wide Green Belt buffer that broadly maintains separation between a series of distinct towns and villages in Surrey, Berkshire and Buckinghamshire, as well as the outer-most fringes of London around Hillingdon. Although the coherence and continuity of the Green Belt varies significantly, overall this broad arc of Green Belt was found to maintain narrow gaps between towns in Elmbridge, Spelthorne, Runnymede and Woking, as well as Mole Valley and Epsom and Ewell, thus maintaining the settlement pattern.

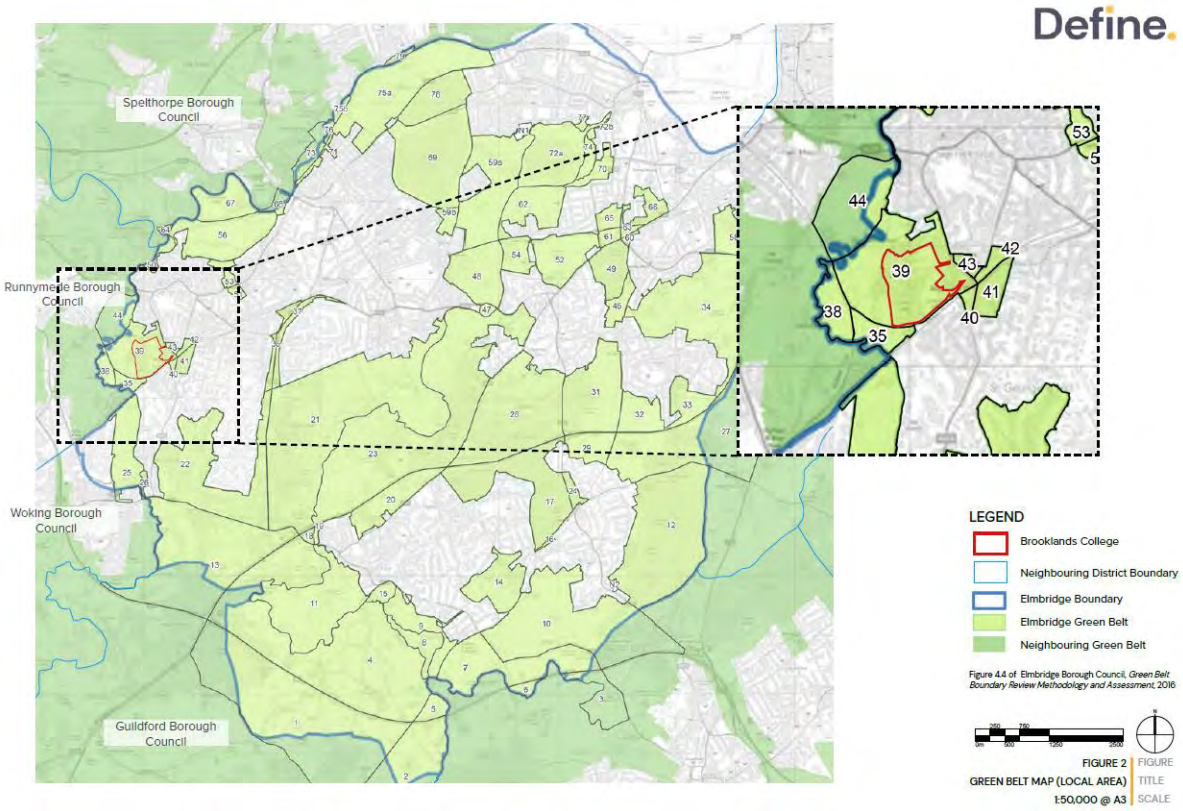
123. The GBBR found Strategic Area B to strongly meet purpose 1 by acting as an important barrier to potential sprawl from large built-up areas such as Walton-on-Thames/Weybridge/Hersham, Staines-upon-Thames, Egham/Englefield Green, Addlestone, Chertsey, and Woking/Byfleet/Woodham.

124. It also found the area to strongly meet purpose 2 by establishing important gaps between a number of Surrey town from merging into one another.

125. The GBBR concluded that the area moderately meets purpose 3 by preventing encroachment into some relatively unspoilt area of countryside due to some variation across the Strategic Area.

126. The GBBR advised that given the Strategic Area protects a series of particularly narrow gaps between settlements, the character of the Area could be altered significantly by alterations to Green Belt boundaries. Consideration should also be given to the Area's particular sense of rurality, though some areas which contain developments may be less sensitive overall.

127. Within the GBBR, as shown in the figure below the application site in its entirety lies within Local Area 39, which measures approximately 73.4ha. The site measures approximately 27ha which makes up around 36.8% of Local Area 39.



128. The GBBR scored this parcel at a rate of 3+ ('moderate') in terms of Purpose 1 [0 being the lowest; and 5 being the highest performing]. The land parcel is at the edge of the large built-up area of Weybridge on its northern, eastern and southern edges, preventing its outward sprawl into open land. The boundary between the land parcel and the Weybridge built-up area is strong and durable to the east where it is bounded by Heath Road (B374). However, the boundaries to the north and south are irregular, being formed by the backs of residential gardens and less defined areas of woodland.

129. The parcel scored 3 ('moderate') against the criteria of Purpose 2 confirming that it forms part of the wider gap between settlements of Weybridge and Woodham, and Weybridge and Addlestone. The GBBR then advises that while it is important to maintain the general openness of this gap and its overall scale, some development may be possible in the east of the parcel without causing the coalescence of these settlements.

130. It should be noted that the GBBR 2016 did not recommend sub-division of Local Area 39. In addition, further Green Belt Boundary Review[9] (GBBR) was carried in 2018 assessing the performance of smaller sub-areas against the Green Belt purposes, which did not entirely or partially include Local Area 39.

131. With regards to Purpose 3, the parcel scored 2 ('relatively weak'). The GBBR confirmed that 12% of the land parcel is covered by built form. The land parcel contains a range of land uses. This includes two educational institutions (Brooklands College and Heathside School) and their associated recreational

[9]Green Belt Boundary Review – Supplementary Work Methodology and Assessment Issue Rev A 06 December 2018 prepared by ARUP

facilities (e.g. tennis courts, football pitches), a low density housing development, a cemetery, and Weybridge Railway Station and a small cluster of buildings around the station. However, much of the local area remains undeveloped, consisting of either densely forested areas or open fields. As a result of the variety of built form distributed across the parcel, the GBBR considers the local area to have a semi-urban character.

132. Each of the NPPF purposes were considered equally significant, thus no weighting or aggregation of scores across the purposes was undertaken. A local area scoring moderately (3) against at least one purpose and failing to score strongly against any purpose (4 or 5) was adjudged as moderate Green Belt. Overall, Local Area 39 was found to have a moderate performance within the GBBR.

133. The 'semi-urban' character referenced within the GBBR is not considered to accurately capture the particular character of the application site. The educational facility on the site (Brooklands College) is clustered centrally within the site. There is also an expansive area of hardstanding with no buildings in the northern parcel of the site comprising a car park serving the College. An area of hardstanding with no buildings also remains in the centre of the southern parcel of the site, where tennis courts used to be. The applicant has provided plan DE 499_PL_217 that shows that only about 24.4% of the site comprises previously developed land (including areas of hardstanding). The rest of the site (75.6%) comprises open green fields (including the areas of landfill that have blended into the landscape) and mature woodland surrounding the site both within and outside the application site boundary. Therefore, the application site is considered to be semi-rural in character interrupted by the cluster of built form at Brooklands College.

134. Para 4.1.1 of the accompanying Gren Belt Assessment sets out that "both the site and wider parcel are considered to be semi-rural and the spatial openness is interrupted by a combination of buildings and woodland areas".

135. Given the distinctive characters on the site and its largely undeveloped nature, officers considers that the site overall should not be identified as having a reduced sensitivity.

136. The Elmbridge Borough Landscape Sensitivity Study (LSS) 2019 forms part of the Draft Local Plan evidence base. Similarly to the GBBR, it is a matter is for the examination of the Draft Local Plan and currently has no status or weight for development control purposes or in policy terms. However, it provides evidence that is relevant to the determination of this planning application. In the LSS, the application site apart from the built-up area of Brooklands College falls within landscape unit UE1-A (figure below). The LSS notes that the woodland gives a semi-rural feel to the area and provides an attractive approach when accessing Weybridge via the railway station and landscape setting to adjacent urban areas and settlements. It also recognises the high biodiversity value and potential of the area. The woodland on the application site and beyond the site's boundary is designated as a Priority Habitat area. 'The Heath' adjacent to the eastern boundary of the application site is designated as Registered Common Land and a Site of Nature Conservation Importance (SNCI). 'The Heath' is also recognised as

a valuable outdoor resource for the communities of Weybridge. The LSS concludes that landscape unit UE1-A due to its densely wooded physical and natural character and the role this plays in the character of the settlement setting to Weybridge has an overall landscape susceptibility rating of high to residential and mixed-use development. It is also found to have high sensitivity to change arising from residential and mixed-use development.

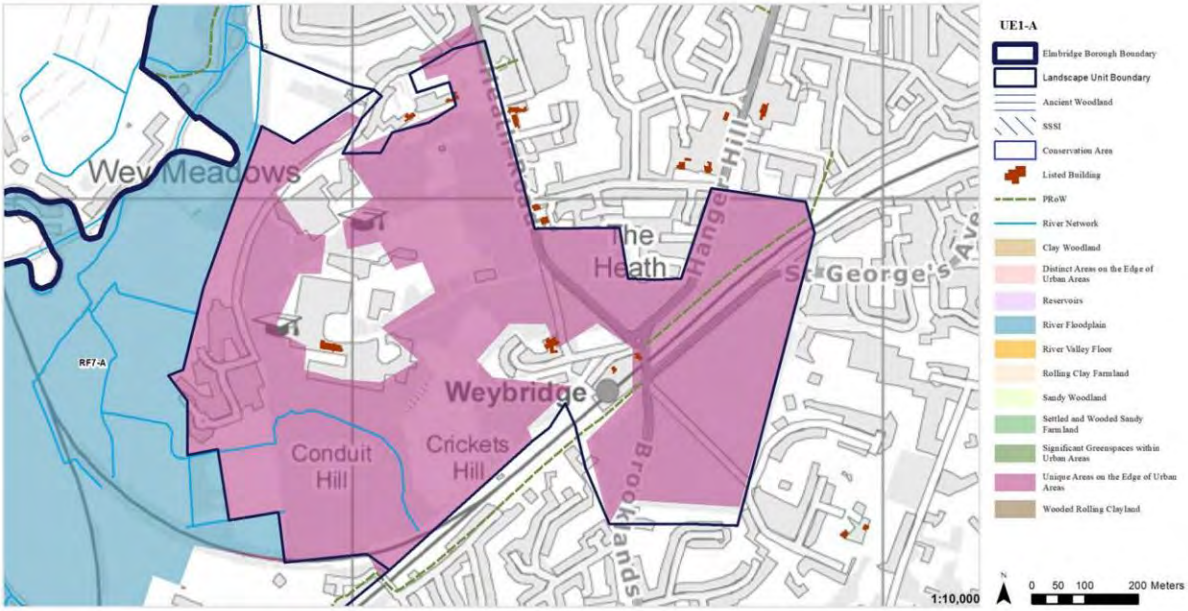


Figure 44: Location plan for Landscape Unit UE1-A

137. Whilst the soundness of the GBBR and LSS is a matter is for the examination of the Draft Local Plan, the documents do include evidence that is relevant to the determination of this application. Given the application site's largely undeveloped nature and location at the edge of the large built-up area of Weybridge settlement, where the boundary between the Green Belt and the large built-up area is not robust, durable or readily recognisable, and the countryside gap between the settlements of Weybridge and Woodham, and Weybridge and Addlestone, the application site as a whole contributes to Green Belt purposes 1, 2 and 3 as set out in paragraph 138 of the NPPF. The application site does not contribute to purposes 4 and 5 of the Green Belt.

The impact of the proposal on the Green Belt, its openness and purposes

138. The application site measures 27.03ha and in its entirety lies within the Green Belt. It comprises an education facility (Brooklands College) with buildings clustered in the centre of the site. The buildings on the site range from one storey to five storeys. There is also an expansive area of hardstanding with no buildings in the northern parcel of the site comprising a car park serving the College. An area of hardstanding with no buildings also remains in the centre of the southern parcel of the site, where tennis courts used to be. As per plan DE 499_PL_217 only about 24.4% of the site comprises previously developed land (including areas of hardstanding). The rest of the site (75.6%) comprises open green fields (including the areas of landfill that have blended into the landscape) and mature

woodland surrounding the site both within and outside the application site boundary.

139. It is noted that until 2000, the site was identified as a major developed site in the Green Belt within the previously adopted 2000 Elmbridge Local Plan (Policy-GRB23: Brooklands College major developed site in the Green Belt). However, this was not carried forward into the current and draft new local plans and, the site is not allocated for development. In addition, that policy related to the development for legitimate college related purposes provided that it did not occupy a larger area of the site than the existing buildings unless this achieved a reduction in height and had no greater impact than the existing development on the openness of the Green Belt and the purposes of including land within it.

140. The proposed development consists of the following works:

- Full and partial demolition of existing College buildings, provision of replacement, new and extended facilities and consolidation of the College's area on the site;
- Provision of new sports hall and community hub for shared use (College and the public);
- Conversion of the Listed Building to 15 flats;
- Conversion of the Gate House to residential use;
- Erection of new residential development (304 units) around the Listed building and in the northern and southern parcels of the site including 40% affordable housing;
- Change of use of the woodland in the south-western corner of the site to a Suitable Alternative Natural Greenspace (SANG);
- Associated engineering and landscaping works, new roads, car and cycle parking, substations and plant and boundary treatments.

141. The application is accompanied by a Planning Statement prepared by Lichfields and Green Belt Assessment ref.DE499_GBA_001 Sep 2023. Rev A prepared by Define.

142. The conversion of the Gate House back to a residential unit, when viewed in isolation, would not result in any additional built form or intensification of its use when compared to existing use. It is noted that paragraph 150d) of NPPF allows the re-use of buildings provided that the buildings are of permanent and substantial construction, preserve the openness of the Green Belt and do not conflict with purposed of including land within it.

143. Para 150e) of the NPPF also allows material changes in the use of land in the Green Belt (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds) provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. The change of use of the woodland in the south-western corner of the site to a Suitable Alternative Natural greenspace (SANG) does not propose any additional built form.

144. The redevelopment of the college including the provision of replacement, new and extended facilities as well as the new sports hall and community hub would be limited to the Previously Developed Land (PDL) parts of the site and the immediate curtilage of existing building. It would result in consolidation of built form on the site and reduction in Gross Internal Area (GIA) of approximately 7,124 sqm. In addition, the replacement buildings would be lower in height than the existing buildings.

145. However, looked at as a whole, the entirety of the site cannot be considered as Previously Developed Land (PDL) since much of the area remains undeveloped, consisting of either densely forested areas or open fields. The applicant agrees, para 4.1.2 of the Green Belt Assessment states that it is "clear that the Proposed Development encroaches into areas of undeveloped open areas of the Site". The proposals are for new buildings in the Green Belt which would not benefit from the exception in paragraph 145(g) or any other exception set out under paragraphs 149 or 150 of the NPPF.

146. Whilst some elements of the development such as the redevelopment of the College's campus or the re-use of existing building (Gate House) could individually have been regarded as not inappropriate development in the Green Belt if they had come forward as standalone applications, they have not been advanced on this basis. The development is advanced as one overall whole and therefore the whole development needs to be assessed in terms of its appropriateness. This is the basis on which officers have assessed the application. It is clear that the proposed development as a whole would not benefit from the exception in paragraph 145g) of the NPPF. The development as a whole would not fall within any of the other exceptions set out in the NPPF and, consequently, would amount to inappropriate development in the Green Belt. The proposal would therefore result in definitional harm to the Green Belt by reason of the inappropriateness and, in line within paragraph 147 of the NPPF, the development should not be approved except in very special circumstances. As per paragraph 148 of the NPPF, the identified definitional harm to the Green Belt must be given substantial weight.

147. The case for potential 'Very Special Circumstances' put forward by the applicant is considered further in the report; however, it is necessary first to assess if there is any harm to the Green Belt resulting from the proposal in terms of its impact on the openness and purposes of the Green Belt.

Spatial openness

148. For there to be spatial harm to the openness of the Green Belt, the proposal does not necessarily need to be publicly or even privately visible as Green Belt is not a landscape designation.

149. The essential characteristics of Green Belts are their openness and their permanence. As noted above, only about 24.4% of the site is currently developed. The proposed development would encroach into areas which are currently undeveloped consisting of either densely forested areas or open fields and would substantially increase the sprawl of development across the site. The proposed

development would increase the developed area on the site from approximately 6.6ha (or 24.4%) to 11.5ha (or 42.6%).

150. The existing buildings on the site are calculated to have a footprint of 13,093m2 and a volume of 109,194m3. The buildings proposed to be demolished measure 4,932m2 in footprint and 37,700m3 in volume. The replacement and new buildings would have a footprint of 15,477m2 and a volume of 135,581m3. The resultant overall footprint and volume would measure 23,639m2 and 207,075m3 respectively. These translate as 80% increase in footprint and 90% increase in volume, which would be very substantial increases.

Block or House	Max number of storeys	Max height incl. plant/lift overrun/chimney, metres	Max height excl. plant/lift overrun/chimney, metres	Max width, metres	Max depth, metres
Block A	5	16.9	16.1	18.2	20.4
Block B	4	13.65	13.11	28.27	17.87
Block C	4	13.65	13.1	27.86	17.8
Block D	4	13.65	13.1	42.4	23.16
Block E	4	13.65	13.26	56.92	35.42
Block F	3	12.82	12.82	61.1	47.68
Block G	4	16.2	15.95	32.17	21.46
Blocks H-J	4	17.42	16.22	64.79	28.79
Block I	4	16.45	16.45	34.68	16.19
Block K	3	12.38	12.14	29.24	13.49
Block L	4	17.09	16.16	23.17	12.37

151. The northern parcel currently comprises hardstanding, currently in use as a car park within the existing Brooklands College Site, and an undeveloped area. The proposal would see the addition of Blocks A, B, C, D, E and F as well as 11 individual houses. The Northern parcel would have 154 homes with the density of 65dph. The dimensions of the apartment blocks are set out in the table above. It can be seen that their height would range from 12.14m to 17.42m. The height of the new individual houses would range from 10.45m to 11.53m. The proposal would result in substantial new development extending approximately 210m by 175m (incl. roads, footpaths, car parks, playground), such that the northern parcel would become very built-up, with a dense and tall form of development.

152. The southern parcel comprises open fields apart from the small area of hardstanding and adjoining footpath. The southern section of this parcel was last used for landfilling activity with the land now blended into the landscape. The proposal would introduce 71 individual houses of 2-3 storeys (or 8.54m to 12.5m) in height and density of 20dph in this parcel. The new development would extend approximately 380m by 180m (incl. roads, footpaths, car parks, playground). As such, it would be substantial in scale resulting in a very built-up and dense form of development.

153. There are existing College buildings around the Listed Building that the proposal seeks to demolish to make way for new homes. It is also proposed to convert the Listed Building to apartments. The Brooklands Mansion and its setting would accommodate 95 homes with the density of approximately 50dph. Blocks G, H-J and I would be introduced in place of Vickers Sports Hall and Wellington buildings. These Blocks would be set further away from the Listed Building but would be of much greater footprint, height, mass and bulk. In addition, Blocks G, H and I would be connected by a podium forming an underground car park. Due to the difference in ground levels, the Blocks would be a storey taller on the southern elevation and would feature solid built form connecting them. Blocks K and L would be introduced instead of Talbot and Concorde. The new apartment Blocks would be taller than the existing buildings on the site. The conversion of the Listed Building to apartments would predominantly be contained within the existing built form apart from the reinstatement of historic roof glazed cupola to stair tower at roof level and porte-cochere doorway at ground floor level. The reinstatement of the cupola would increase the height of the Listed Building to 26.25m. The later extensions to the Listed Building are proposed to be removed. The hardstanding areas to the south of the Listed Building would also be removed and historic terraced gardens would be reinstated, which is considered an improvement. Overall, the northern parcel would feature development of greater footprint, height, mass and bulk.

154. In addition, the development would result in intensification of the use of the site when compared to existing situation on the site as a result of the creation of 320 homes, SANG, other publicly accessible facilities and associated traffic generation. This together with other works required to deliver the residential units on the site including the creation of new roads, car parks, cycle stores, associated engineering and landscaping works, substations and plant, boundary treatments and domestic paraphernalia associated with residential use would have an urbanising effect on the site and Green Belt.

155. It is clear from the above that the development, by virtue of the increase in footprint, height, volume, mass and bulk as well as intensification of the use of the site, would result in substantial harm to the spatial openness of the Green Belt.

Visual openness

156. The spacious character is very apparent within the site and is not diminished by the presence of the mature woodland surrounding the site. The proposed development, by virtue of the increase in footprint, height, volume, mass and bulk as well as intensification of the use of the site, would result in substantial of visual openness within the site itself. The proposed development would open up the site and make it publicly accessible land for Brooklands College students and staff, future occupiers of the residential properties, visitors and other members of the public, such as nearby residents wishing to make use of the SANG, other public open space, playgrounds, Sports Hall, Community Hub or the restaurant and beauty salons offered by the College. Anyone accessing the site would therefore have uninterrupted and up-close views of the newly introduced built form. Consequently, there would be a severe visual impact from within the site itself, as

once one enters the site and is stood within the proposed development it would not be possible to identify the site as land free of development, i.e. characterised by its openness. As such, the proposal would result in substantial harm to the visual openness of the Green Belt within the site itself.

157. However, it is noted that the site is bound by dense mature woodland both within and outside the application site boundary, which serves to screen it from the adjacent roads and other surrounding development. The application is supported by viewpoint photography in the Green Belt Assessment.

158. Glimpse filtered views of thew new development would be possible from Heath Road through trees, especially in winter months.

159. As part of the development, it is proposed to remove a part of the woodland adjacent to the boundary with the neighbouring properties in Caenwood Close. This would increase the visibility of the site and proposed development from these properties.

160. In addition, the southern boundary of the site adjacent to the Weybridge station car park is screened by a thin belt of trees and views are possible into the site, especially in winter months.

161. Furthermore, the woodland adjacent to the eastern boundary of the site is common land and a Site of Nature Conservation Importance (SNCI), known as The Heath. The Heath is well used by local residents and particularly dog walkers, who would be appreciate the loss of visual openness on the site.

162. As such, the proposed development would result in moderate harm to the visual openness of the Green Belt viewed outside the site.

163. Overall, the proposal would result in substantial harm to the visual openness of the Green Belt.

Effect on the purposes of including land within the Green Belt

164. The application site does not lie within the natural confines of the large built-up area of Weybridge. Only 24.4% of the site is developed with the rest comprising undeveloped areas. It Is not proposed to remove the site from the Green Belt as part of the new Local Plan.

165. Given the application site's largely undeveloped nature (75.6%) and location at the edge of the large built-up area of Weybridge settlement, where the boundary between the Green Belt and the large built-up area is not robust, durable or readily recognisable, the application site as a whole was found to contribute to Green Belt purpose 1 (to check unrestricted sprawl of large built-up areas).

166. The proposed development, by virtue of the increase in developed area, footprint, height, volume, mass and bulk as well as intensification of the use of the site, would result in the sprawl of large built-up area of Weybridge. This would be particularly noticeable in the Southern parcel of the site, which is currently free of

development and comprises the Green Belt boundary. The development would extend close to the site's boundary with the Weybridge station car park, which is outside the Green Belt. As noted above, views here would be possible, particularly in winter months. In addition, a part of woodland along the eastern boundary would be removed and, the new houses would attach to the neighbouring properties in Caenwood Close. These properties would then be read as part of the same built-up area. To the north, the Heathside school lies at the edge of the Green Belt. Significant development is proposed in the Northern parcel of the site adjacent to the boundary with the Heathside School. The proposed development would therefore link the built-up area from the Heathside School to Caenwood Close to the Weybridge station car park and residential development beyond the railway line. As such, it would result in significant conflict with purpose 1 (to check unrestricted sprawl of large built-up areas).

167. Whilst the proposed development would reduce the wider gap between the settlements of Weybridge and Woodham, and Weybridge and Addlestone, a meaningful and considerable gap would remain between these settlements. As such, the development would have a limited conflict with purpose 2 (preventing neighbouring towns merging into one another).

168. The proposed development would increase the developed area on the site from approximately 6.6ha (or 24.4%) to 11.5ha (or 42.6%) and would result in 80% increase in footprint and 90% increase in volume over the existing development on the site. It would encroach into areas which are currently undeveloped consisting of either densely forested areas or open fields. As such, there would be significant conflict with purpose 3 (safeguarding the countryside from encroachment).

Conclusion on Green Belt

169. The proposed development, when considered as a whole, would not fall within any of the exceptions set out in the NPPF and, consequently, would amount to inappropriate development in the Green Belt. The proposal would therefore result in definitional harm to the Green Belt by reason of the inappropriateness and, in line within paragraph 147 of the NPPF, the development should not be approved except in 'very special circumstances'. The development would result in substantial harm to the openness of the Green Belt and significant conflict with purposes 1 and 3 and limited conflict with purpose 2 of including land within the Green Belt.

170. As required by paragraph 148 of the NPPF substantial weight must be given to any harm to the Green Belt, and thus to the harm identified above. '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.

171. The report below continues to assess whether the development would result in any other harm. The balancing part at the end then assesses the case for potential 'Very Special Circumstances' put forward by the applicant and whether

the benefits of the scheme outweigh the substantial harm to the Green Belt and any other harm resulting from the proposal.

Affordable housing and viability

172. Paragraph 65 of the NPPF states that 'Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development:

a) provides solely for Build to Rent homes;

b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);

c) is proposed to be developed by people who wish to build or commission their own homes; or

d) is exclusively for affordable housing, an entry-level exception site or a rural exception site.

173. Paragraph 60 of the NPPF states that within the context of significantly boosting the supply of homes, the needs of groups with specific housing requirements need to be addressed. Paragraph 62 of the NPPF sets out that planning policies should reflect the size, type and tenure of housing needed for different groups in the community including those who require affordable housing. Finally paragraph 63 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified.

174. The NPPF is a material consideration in the determination of all relevant planning applications. However, as set out in Section 38(6) of Planning and Compulsory Purchase Act 2004, the starting point for any decision is the Development Plan unless material consideration(s) indicate otherwise. As set out in paragraph 2 of the NPPF, this approach is required by planning law. It is therefore for the decision-maker to determine the weight to be applied.

175. Policy CS21 (Affordable Housing) requires, where viable that developments resulting in the net gain of 15 and more residential units should provide 40% of the gross number of dwellings on-site as affordable housing. Where exceptionally development is proposed on a greenfield site, at least 50% of the gross number of dwellings should be affordable. The applicant has provided plan DE 499_PL_217 that shows that only about 24.4% of the site is developed. The proposed development would encroach into the greenfield areas of the site, namely the north-west corner of the Northern parcel and the majority of the Central and Southern Parcels. Therefore, the blended rate of policy compliant on-site affordable housing provision is calculated to be between 40% and 50%. The applicant at para 8.45 in their planning statement recognises that the proposal does not provide 50% affordable housing on the greenfield elements of the site.

They calculate the blended rate for the proposed development to be 43%. This is based on 222 units on previously developed parts of the site (89 units at 40%) and 98 units on green field land (49 units at 50%) as demonstrated on plan BA9691-SK023 Rev C. However, it should be noted that this plan counts the greenfield land that would contain Blocks A, B, C and D within the Northern Parcel as previously developed land.

176. The supporting text of this policy confirms that in the exceptional circumstances where it is considered that the delivery of affordable housing in accordance with the policy is unviable, this must be demonstrated through the submission of a financial appraisal alongside a planning application. Evidence provided would be scrutinised through an independent review. If the Council is satisfied that affordable housing cannot be provided in accordance with the policy, it will seek to negotiate alternative provision.

177. The Core Strategy refers to the latest SHMA and SPD in terms of tenure mix. Based on the 2016 SHMA, there is a need for 332 affordable homes per year. The Development Contributions SPD 2021 sets out the following proportional need for affordable housing based on the Strategic Housing Market Assessment (SHMA) 2016:

	Social rented sector	Affordable rented sector	Intermediate sector
1 bed	75	12	**13**
2 bed	66	19	**15**
3 bed	59	26	**15**
4+ bed	**56**	**28**	**16**

178. The Local Housing Needs Assessment 2020 set out that the overall net annual need for affordable housing is estimated to be 269 units per annum. The Local Housing Needs Assessment (Addendum) 2021 identified that 71% should be rented affordable tenures and 29% is for intermediate tenures that could include elements of home ownership.

179. The Government has recently introduced the 'First Homes' scheme, which provides a specific kind of discounted market sale housing. The Government's policy on First Homes and how it should be implemented is set out in the Government's Written Ministerial Statement (24 May 2021) and Planning Practice Guidance (PPG). Minimum 25% of all affordable housing contributions secured through developer contributions must be First Homes. These homes must be discounted by a minimum of 30% against the market value and sold to any person(s) meeting the First Homes eligibility criteria. After the discount is applied, the first sale must not be higher than £250,000 (or £420,000 in Greater London). Restrictions will apply so that the discount is passed on through subsequent sales of the property.

180. Development Management Advice Note 6 (First Homes) sets out that the Council's current expectation of tenure mix for affordable housing following the introduction of First Homes is now: First Homes (25%); Social Rented (17%); Other Rented (31%) & Intermediate (27%).

181. The application is supported by a Financial Viability Appraisal (FVA) and proposes to provide 40% (or 128) of the proposed units as affordable housing. The proposed tenure and housing mix are detailed in the table below.

Affordable housing tenure

Unit size	First Homes, number	Shared ownership, number	Affordable rent, number	Total, number
1-bed	32	21	21	74
2-bed		26	28	54
Total	32	47	49	128
Proportion, %	25	36.7	38.3	

182. The submitted FVA has been reviewed by an independent financial viability assessor (Bespoke Property Consultants, BPC) on behalf of the Council. BPC have initially calculated the proposal to produce the surplus of £5,522,967 against the benchmark value. However, when including the ESFA debt (£20) in the calculations, the development was calculated to produce a deficit of -£14,477,033 against the benchmark value. Given the viability implications, the 40% affordable housing provision rate can therefore be accepted on the site. The Council's Housing Team also support the affordable housing provision on the site.

183. The development would provide 25% of affordable units as First Homes which is in line with the current requirements. It is noted that the shared ownership proportion would be slightly above and the affordable rent proportion would be slightly below the current requirements. However, the tenure mix overall is considered to be broadly in line with the current requirements. The housing mix is discussed in the next chapter.

184. Given the viability constraints, the 40% affordable housing provision rate on the site as well as the proposed tenure are considered to be in line with Policy CS21, Development Contributions SPD 2021, DM Advice Note 6 (First Homes) and the NPPF 2023.

Housing mix, density and need

185. In accordance with the NPPF, it is the Government's objective to significantly boost the supply of homes. Paragraph 62 of the NPPF sets out that planning policies should reflect the size, type and tenure of housing needed for different groups in the community.

186. Paragraph 125 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that

developments make optimal use of the potential of each site. This needs to be balanced against the requirement to protect the Green Belt.

187. Policy CS19 (Housing Type and Size) and Policy DM10 (Housing) state that new developments should meet the identified need for housing and offer a range of housing choices, in terms of the mix of housing sizes and types. Policy CS19 states the Council will promote a mix of house types and sizes across the Borough and resist an over concentration of any one type of dwelling if this is considered to have the potential to adversely affect community cohesion.

188. Policy CS17 (Local Character, Density and Design) sets out that in order to promote the best use of urban land and to protect the Borough's green spaces, developments should contribute to an overall housing target of 40 dwellings per hectare and achieves a minimum of 30 dwellings per hectare (dph). It should be noted that the site is not located on urban land given its Green Belt designation. As such, the proposed density will need to be balanced against the requirement to protect the Green Belt.

189. The latest measure of housing need for Elmbridge is set through the Government's Standard Methodology which, identifies the requirement to provide 647 dwellings per annum across the Borough. Breaking down the annual requirement to identify the type, size and tenure of new homes that should be provided to meet local housing needs, is set out in the Local Housing Needs Assessment (LHNA, 2020). The LHNA as set out in the table below identifies the overall need within Elmbridge is for smaller market units and larger affordable units:

N. of bedrooms	LHNA requirement, Market	LHNA requirement, Affordable
1-bed	20%	15%
2-bed	50%	34%
3-bed	20%	11%
4-bed	10%	40%

190. The Council has published Development Management Advice Note 1: Understanding Housing Need, which is available on the Council's website. The provision of smaller dwellings is considered vital for widening the choice of homes within the Borough and, there is an identified overwhelming need for smaller dwellings. There has also been an oversupply of large, four or more bedroom properties.

191. The Council considers that community cohesion across the Borough could be detrimentally impacted by not having a mix of smaller units. This matter is exacerbated by the affordability of housing. At 18, Elmbridge has the 7th highest affordability ratio in England and first outside of London. Elmbridge's average (mean) house price is £780,413 which equates to 8th nationally and 1st outside of London. The continued oversupply of larger homes could further exacerbate affordability issues and going forward this size of home no longer positively contributes towards meeting local housing need.

192. The proposed development would deliver 320 residential units comprising 83 houses and 237 apartments. The housing mix for the proposal is set out in the tables below.

Market homes unit mix

Unit size	Number of units	Proportion, %	LHNA requirement
1-bed	26	13.5	20%
2-bed	83	43.2	50%
3-bed	55	28.6	20%
4-bed +	28	14.6	10%
Total	192		

Affordable homes unit mix

Unit size	Number of units	Proportion, %	LHNA requirement
1-bed	74	57.8	15%
2-bed	54	42.2	34%
3-bed	0		11%
4-bed +	0		40%
Total	128		

Combined mix

Unit size	Number of units	Proportion, %
1-bed	100	31.3
2-bed	137	42.8
3-bed	55	17.2
4-bed +	28	8.8
Total	320	

193. It is noted that in terms of market housing units, the proposal would deliver slightly more 3-bed and 4-bed + units than required in the LHNA. Whilst in terms of affordable housing units, no 3-bed or 4-bed+ units are proposed.

194. Development Management Advice Note 1 (Understanding Housing Need) sets out that to ensure that new homes positively contribute to meeting local housing needs in terms of their size, the Council will consider any first floor and above rooms leading off a landing/ hallway with a window and capable of accommodating a single bed as a bedroom.

195. House Type 11 features a study in the loft and House Type 8 has a first floor living room. The study in the loft has a floor area of 6.9sqm, which is below the nationally described standards for a single occupancy room. The first floor living room in House Type 8 has a floor area of 17.5sqm and is capable of

accommodating a single or double occupancy bedroom. As such, the living room in House Type 8 will be counted as an additional bedroom. Given that House Types 8 and 11 are proposed as 4-bed+ units, the inclusion of an additional bedroom would not affect the overall housing mix.

196. As noted in the 'Affordable housing and viability' section, 25% of the proposed units would be First Homes, whose price is capped at £250,000. Given the affordability issues in the Borough, it is recognised that only 1-bed First Homes can be delivered at this price cap.

197. The Council's Housing Team have reviewed the proposal and advised that whilst they would have preferred for the scheme to provide a few 3-bed affordable rent units, they recognise the location and site layout constraints, and confirmed that, overall, they support the scheme in its current form.

198. Overall, the proposed development would deliver a large number of smaller residential units with 4-bed+ units only constituting 8.8% of the total housing mix. It is also recognised that the proposed housing mix is driven by the viability of the scheme to ensure that the scheme as a whole is deliverable.

199. Based on the site's red line area of approximately 27.03 hectares, the overall density for the proposal measures approximately 11.8dph. The applicant has also supplied drawing BA9691-2060 Rev A showing the density calculations for smaller individual residential areas. The Northern parcel would have 154 homes, which translates as density of 65dph. The Brooklands Mansion and its setting would contain 95 homes with its density measuring approximately 50dph. The Central and Southern Parcel are proposed to have 71 homes with a density of approximately 20dph.

200. As such, the proposal would deliver the housing types for which there is an identified need within the Borough and, the proposed housing mix would be in accordance with Policy CS19 of the Core Strategy 2011, Policy DM10 of the Development Management Plan 2015, Development Management Advice Note 1: Understanding Housing Need and the NPPF 2023.

Design considerations

201. The NPPF 2023 at paragraph 126 sets out that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. It then continues that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.

202. Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority must pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

203. Policy CS17 requires development to deliver high quality design which responds positively to the features of individual locations, and to integrate sensitively with locally distinctive townscape, landscape and heritage assets.

204. Policy DM2 of the Development Management Plan 2015 requires proposals to preserve or enhance the character of the area, taking account of design guidance detailed in the Design and Character SPD, with particular regard to the following attributes: appearance, scale, mass, height, levels and topography, prevailing pattern of built development, separation distances to plot boundaries and character of the host building, in the case of extensions.

205. Policy DM12 relates to heritage, including areas of high archaeological potential, and in relation to listed buildings states that development within the vicinity of a listed building should preserve or enhance its setting and any features of special architectural or historical interest which it possesses. In relation to conservation areas, Policy DM12 states that development of or affecting the setting of a listed building, should preserve or enhance its setting and any features of special architectural or historic interest. In regard to the change of use of listed buildings, DM12 states development will be approved where the buildings setting, character and special interest would be preserved or enhanced and that consideration will be given to the long term preservation that might be secured through a more viable use.

206. Furthermore, Council's Design & Character SPD 2012 advises that new development should be designed with careful consideration given to the grain, building line and plot coverage, should respect established spacing patterns in the streetscape and relate to the character of the area.

207. The site is located to the north west of Weybridge railway station, in a parcel of land edged by urban land to the south, and Green Belt to its north, east and west. Whilst located close to large urban areas given the sites immediate wooded surroundings it is relatively well screened from views from the public realm. Once inside the site views out are restricted due to woodland, and this provides the site with a somewhat isolated nature compared to the abutting urban areas. There is a single listed building within the site (the Mansion Building), plus the curtilage listed gate piers and the locally listed obelisk to the south. The main built form in the site comprises the existing college campus, which contains a mix of built form, in terms of scale, age and design. The proposal will be assessed in relation to the potential impact on the character and appearance of the site, the potential impact on the surrounding area and the potential impact on the setting of the designated and non-designated heritage assets.

208. The site is not located within any of the recognised character areas identified within the companion guide to the Council's Design and Character SPD 2012 given its Green Belt siting. The WEY04 Heath Road and environs sits north of the site, but as set out above the wooded borders of the site provide a clear separation to this area.

209. The proposal comprises a mixed development. The existing college campus will be altered and re-organised, including the demolition of some existing college buildings and the erection of new ones in a smaller campus area. The listed building will be altered from its current education use (albeit currently vacant) to residential flats, and then there will be new areas of housing across the site, in a mix of houses and flats. The figure below indicates the proposed site plan and the various elements proposed. Given the size of the site and nature of each element, the design considerations will assess them individually and then provide a summary of the entire scheme.

Area 1 – college campus

Layout

210. The existing college campus spreads over the western developed portion of the site, and buildings within it show a mix of ages, styles, scale and form. The proposal would see a number of these buildings demolished, and the creation of a 'tighter' campus providing a more efficient, usable layout, and one that would be easier to secure to ensure the safeguarding of students as the current campus is very porous. The new buildings within the college campus create a typical educational facility, and their designs emphasis their use. The new campus would comprise two clear styles. To the east the buildings are modern in finish and to the west they are more traditional and finished in brick.

211. The layout proposed follows a rough east – west line, with the main college entrance located to the east of the campus area, offering clear route finding from

the sites main entrance further to the east. The existing tower block on site would be retained and this provides a distinctive corner post for the site. The majority of the buildings would be located around a central quad, which would offer students an area to gather away from the residential areas elsewhere on the site. There would be another courtyard area further west into the campus offering a separate area for SEND students. The new sports hall and hub building (new build) would be sited at the eastern end of the campus area, with its own parking area to its north, allowing for easier access for users. Staff parking is located at the western end of the campus, with its access off the central road though the site. The parking for students is proposed within the car park serving the Sports Hall and Community Hub. The buildings to the north of the campus would be retained, with the Hawker building being extended to its rear. These buildings abut the existing woodland. A new boundary fence would be erected to secure the campus.

212. The layout is considered to be functional and is suitable to serve the College's needs. The improved entrance legibility will make it easier for visitors to find and enter the college campus area, which is a noted improvement.

Height and Massing

213. A number of the existing college buildings would be retained (Barnes Wallis, Tower, Locke King, Hawker, Edge and Studio/Admin Centre) so the height and massing wouldn't change significantly. In some instances, alterations in materials and the addition of plant will lead to some changes but not substantial ones. The new sports hall and hub building would be two storeys in height, with the hub element having two asymmetric gables which would be higher than the glazed entrance area to its side. The sports hall located to the rear would be lower, but still two storeys. This scale and massing would not compete with the other campus buildings which form the eastern 'frontage' of the campus, and as such is considered acceptable. The sports hall and hub building would be located in closest proximity to the new residential units to the east (Block E), itself a four/three storey building. It is considered the height/massing of the sports hall and hub building would offer an acceptable transition in scale between the campus and residential area, without creating a dominant or incongruous appearance.

214. The new Vickers building, located to the western end of the campus would comprise a three storey flat roofed building. It would be well separated from other buildings around it, and given the open areas to its west, south and east, would integrate into the wider campus area. The new campus area, as a result of an overall reduction in its area would appear more cramped, but the scale of the buildings within it are considered to be of an appropriate scale and mass. It would, with the inclusion of a more defined boundary, present a more coherent campus area.

Appearance

215. The improved entrance area, to the eastern end of the campus, would comprise of a large glazed entrance foyer, with open plaza area to its front, which would present a modern, well defined entrance for the entire campus. The hub

building, which sits aside the entrance foyer, consists of a frontage of two asymmetric gables, which has the appearance of an historic warehouse/industrial building, in reference to historic links with industry in the local area. The sports hall to its rear would comprise a simple form and finished in brick. The Hawker building would see alterations to its facades but its current appearance would essentially be retained. The Edge building, Locke King and Admin buildings would again see limited changes from their existing appearance, aside from limited cosmetic alterations. Taking together the campus as a whole the existing buildings would see limited changes, and the new buildings would complement the existing, providing an overall improvement in appearance of the college building.

Materials

216. As referred previously, the main entrance to the college would feature a large glazed entrance, with part aluminium powder coated cladding to match the tone of the cladding on the Barnes Wallace building. The rear and side would be finished in brick. Existing buildings retained within the campus would see some alterations to materials, but none so significant as to substantially alter their appearance, aside from the Tower building. This building is currently finished in a drab looking concrete panelling, and the proposal would see the tower clad in graduated green panelling which lightens as it moves up the building, the fenestration would also be altered. This is considered a noticeable improvement as the Tower block is a prominent building given its height and mass, and the addition of the proposed cladding would create a striking building on the corner of the campus area. Conditions can be applied to ensure the final materials are of an acceptable quality and appearance.

Landscaping

217. The campus would be ringed with landscaped areas, with further landscaping within the campus cores for students. The entrance to the east of the campus has large areas of existing well treed, landscaped areas which will be enhanced by new planting and new paths to create a legible route for users of the college. The existing woodland boundary to the north of the campus area would be retained, and this provides a robust buffer to the site. The new car park areas would contain landscape buffers, and new tree planting, to soften the visual impact of parked vehicles. A new boundary fence would wrap tightly around the southern border of the campus and allow more room to the north encompassing the wooded areas. It would then sit against the edge of the sports hall building and provide a distinct boundary between the public and college parts of the site. Whilst its appearance could be considered somewhat stark, it’s a now accepted and necessary feature of educational facilities. By utilising building edges the amount of fencing can be limited in the more publicly visible locations. The campus would be viewed primarily from the new housing areas to its south and north east, and from the main site road to the east, and given the existing tree planting, which is to be retained, the campus would retain its character of an educational facility located in a well treed area.

Area 2 – Listed Building and its surroundings

Layout

218. The current site layout sees the Listed Building (LB) (the Brooklands Mansion) physically linked to the Locke King Link and Concorde buildings. To its east are the existing Wellington and sports hall buildings. The proposed development would see the Locke King link, Concorde, Wellington and Sports Hall buildings all demolished. This would see the LB separated physically from more modern additions, and its setting would be more akin to its original form when it was a large detached dwelling. The tiered areas to the south of the LB, which currently consist of hardstanding, are not an attractive feature. The proposal would see these areas landscaped to better reflect their original purpose of domestic external amenity space. This would again represent an improvement to the setting to the LB.

219. The removal of the existing buildings from the proximity of the Mansion has created an opportunity that has led to the new Blocks being of greater scale. However, whilst they will alter how the Mansion is seen, the separation means that they are of no greater overall impact than the buildings to be removed. Drawing BA9691-2104 provides a clear understanding of the relationship of the new blocks to the Mansion. It is considered the design, being of a modern simplicity means that they do not complete with the listed building.

220. To the east of the LB, three new buildings are proposed (Blocks H,J, G and I). The nearest building is sited some 36m away from the LB, and there is an intervening area of landscaping to separate the buildings. The buildings are set loosely around a courtyard, with a basement car park below, to hide parked cars. Blocks H and J are linked with an under croft vehicular access, with Block G and I sited south and east of this larger building. This built form is located in the area where the previous Wellington and Sports hall buildings were sited, but provide a greater separation to the LB. The orientation of the buildings means the longest frontage, which includes the under croft, faces away from the LB, and towards the main road through the site. Whilst undoubtably when travelling towards the LB this collection of buildings would present a frontage which somewhat competes with the setting of the LB, it does provide a greater physical separation, which is considered positive.

221. To the west of the LB are sited two smaller, detached blocks (K and L). Block K is sited some 20m from the western side of the LB. Its southern end projects forward of the LB's rear elevation, which is unfortunate and results in a relationship which somewhat competes with the LB, but given the physical separation and removal of the existing Concorde building, which projects even further south, this impact is not considered to be unacceptable. Block L is orientated at 90 degrees to Block K, which creates a triangular area of landscaped grounds which both blocks mutually overlook. This layout is considered acceptable.

Height and Massing

222. The proposed works to the Listed Building would see alterations made to it to restore its historic appearance. The external alterations including the re-installation of the clock tower, cupola and roof glazed cupola to stair tower at roof level and porte-cochere doorway at ground floor level and the installation of solar panels at roof level. The reinstatement of the cupola would increase the height of the Listed Building to 26.25m. The proposed porte-cochere would be minor in scale. There would a reduction in massing of the LB following the demolition of the later extensions and, as a result, there would be greater space created around the building which is considered to be positive. A detailed assessment on the impact to the designated and non-designated heritage assets is made elsewhere in this report.

223. With regard to the two closest new residential blocks to the west, blocks K and L, their height and massing is considered acceptable in regard to the wider site and their impact upon the LB. Given that Block K is closest to the LB, its scale is smaller than Block K, and it's formed of three storeys of accommodation with a pitched roof over. The elevation facing the LB comprises an asymmetric gable to reduce the mass facing the LB, and has windows set into the roof to further aid in reducing the mass on this sensitive frontage. Block L, being sited at a greater distance from the LB and close to the wooded boundary of the site, is of a greater scale, comprising four storeys of accommodation under a pitched roof. The northern elevation would abut the staff car parking for the college, so whilst its mass would be readable from this open area, its form is not considered to be harmful given the separation around it.

224. With regard to Blocks G, H, I and J, whilst these are not a single element of built form, given their position and relationship between them, particularly Blocks H and J as they are linked, they read as one comprehensive mass of built form. They would loosely sit around a central courtyard, and so are considered to read as a group. Blocks H and J are linked, with an undercroft providing some visual relief to the long northern elevation. Block H contains four stories of accommodation, with the link to Block J dropping down to three stories. Whilst this elevation would be readily visible when travelling through the site from east to west (from the site entrance towards the LB), given the alteration in heights, undercroft feature and intervening existing tree coverage, the mass, whilst not inconsiderable, is not considered to be unacceptably harmful given its angled relationship to both the road and the LB. The element closest the road would be the buildings lowest part aiding its appearance in the street. Blocks G and I, given their siting would be less visible from the above referred access, and when viewed in conjunction with the other adjoining blocks are considered to be of an appropriate size. Block I would appear from the south to be a five storey building, given its raised form with undercroft/underground parking below it. Whilst this would present a large bulky elevation, given the relatively limited visibility of this it is not considered to be unacceptably harmful. The wooded area to be used as SANG is sited relatively closely to the rear of the building, longer distance uninterrupted views of this elevation are considered to be restricted, and whilst views would be available from the landscaped areas to the south of the LB they would be at an angle, and it would be sited at a sufficient distance from the LB that it would not compete with it.

225. Whilst the new blocks around the LB do alter the built form when compared to the existing, it is considered given the layout and overall scale of the site that the changes would not be harmful. Impacts upon the setting of the LB, in particular from those blocks in closest proximity, will be assessed within the overall planning balance of the scheme.

Appearance

226. The works to the LB are subject to a separate Listed Building Consent, but officers are satisfied that subject to the use of appropriate materials, the works to the LB would have an acceptable and beneficial impact on its appearance. The removal of non-original additions would also improve the buildings setting.

227. With regard to Blocks G to L, all six of the blocks have a common appearance, providing a consistent overall character for the new build residential blocks around the LB. Design features such as asymmetric gables, windows set into the eaves and recessed balconies provide some visual interest to the built form. It is inescapable that some of the blocks, particularly the prominent northern elevation of Blocks H and J would alter the existing character and appearance of the site, but as part of a comprehensive site wide development, their appearance, in conjunction with those other blocks around the LB are considered to be sufficiently coherent to provide a sense of place, to this part of the site. The LB is a prominent building, and the appearance of the new blocks around it, given their siting, scale and design is considered to be acceptable.

Materials

228. The materials used for the LB will need to be carefully selected to ensure the alterations are suitably blended to the existing buildings appearance. The materials used for the six blocks surround the LB are all consistent, being a red/orange brick mix for the walls, mix of windows and balconies (both inset and projecting) and clay effect tile for the roof. Some key elevations also include brick detailing, for example projecting vertical stacking brick detail found on the north west elevation of Block I. Such detailing assists in providing visual interest to large elevations, and subject to relevant conditions relating to the materials, those materials proposed are considered to be appropriate.

Landscaping

229. The LB will see its tiered garden to its south re-instated and this would replace the existing hardstanding area used by the college presently. This landscaping would be part of a wider scheme to improve the landscaping around the LB. It is unfortunate that the western end of the LB would abut a car park, and whilst some landscaping can be sought in this area its impact would be somewhat limited given the areas required for parking. Nevertheless, a balanced judgement needs to be taken. Blocks K and L are positioned with their ‘front’ elevations facing toward a communal landscape area, and landscaping is provided around these buildings also. Blocks G-J as referred previous ‘look in’ to a central courtyard area, and the blocks themselves are surrounded with landscaped areas, including the extensive existing treed areas to the north and south of the proposed

buildings. It is considered sufficient landscape buffers existing between the blocks and the LB, and other development (college campus to north, lower density housing to the east) to allow the spacious treed nature of the site to be retained.

Area 3 – northern residential area

Layout

230. The Northern residential area of new residential development includes a mixture of flats and houses within a varied number of building types. Adjacent to the College access is a terrace of flatted developments which give way to detached houses behind and larger, more standard flatted blocks in the northwest corner. Its character is tight and enclosed, unlike the central and southern parcels below. Parking is provided in a number of parking courts to the rear of the frontage blocks and in many cases would be out of sight.

231. To the northeast of the campus the northern parcel continues in the architectural style of the campus providing continuity and an enhanced and memorable entrance to the college. The houses are repetitive and will form a modern street scene. Overall, they designs hold together as one scheme and it's considered that it is on balance acceptable in design terms. This area also includes the gate house and entrance piers (the piers are curtilage listed structures) which are to be retained with limited alterations proposed to the gate house (adjacent the sites entrance to the east). Blocks E and F form a clear 'wall' of development that provides a handrail to guide people towards the main college entrance, with the residential area being set behind these blocks. Boths these blocks have 'wings' which screen parking areas to serve those buildings.

232. Blocks A, B and C sit close to each other along the northern boundary of the site, and again their position screens the parking that serves them. There exists a clear separation to the south which separates the residential areas from the college campus. Block D sits on a north-south axis, with its main elevation facing west towards Blocks A-C, creating a loose well overlooked courtyard area. To the east of Block D are a number of new detached houses. These have a typical urban form, with gardens backing onto each other, and parking to the front, with the exception of a single dwelling (House type D 22 H) which sits at the eastern end of the housing area. This unit is suitably distanced from its neighbours and makes a more efficient use of this part of the site so its siting and layout is considered appropriate.

Height and Massing

233. The houses in the north east of this area comprise three storey dwellings with pitched roofs over. Units with an attached garage see this sit aside the dwelling with a single storey rear extension with a flat roof over. Units without the attached garage feature flat roof single storey rear extensions. Given their siting, with larger blocks of flats to their south and west, and substantial woodland screening to the north and east the scale of the dwellings is not considered to appear dominant.

234. Turning to the flatted blocks in this part of the site, Block A comprises five storeys of accommodation, with Blocks B and C containing four storeys, and all these blocks have flat roofs over. The scale and form, whilst simple given their square/rectangular shape, is considered acceptable. Sufficient space is given to the blocks so they don't appear cramped.

235. Block D, which abuts the houses, is four storeys on its western side, dropping down to three storeys where it meets the adjoining houses. The transition in height compared to the houses is considered a suitable way of addressing the change in mass and unit type when read from the street.

236. Blocks E and F form a frontage to the northern residential area, and both buildings contain accommodation over multiple storeys. Block F, the block closest to the site entrance comprises three stories of accommodation with a pitched roof over. Given its shape, its eastern gable would be most visible from those entering the site. This end comprises a gable with some design detailing which helps to break up its mass somewhat. Whilst this building is clearly large, views from street level would typically be along its frontages rather than being seen 'as one' so its mass is considered to be appropriate in this location. Block E further to the west, comprises four storeys at its western end with a flat roof closest to the college, which then drops to three stories further east with a pitched roof over, to transition to Block F.

237. The built form in the area, given its current almost entirely undeveloped nature, represents a significant change in its character. The flatted blocks are of a substantial scale, and they will create a new character for this part of the site. It would be viewed in conjunction with the college campus along the main college entrance axis, but once away from the college area built form of a substantial scale would be readily visible in all directions. However given the siting and screening around this parcel of the site, the change in scale is not considered to be unacceptably harmful.

Appearance

238. The appearance of the detached dwellings is considered to be simple, constructed with brick and featuring limited detailing on front elevations. Window/door openings are arranged in a typical layout.

239. Blocks A-C given their close interrelationship are of a similar appearance. Block A has been designed with its fenestration in a symmetrical layout that indicates its association with the college campus. This block initially had its most prominent corner comprising a bin/cycle store which created a non-active frontage, but amended plans have been received to revise the layout to bring this prominent corner into a more active use. The fenestration across the block is not uniform to provide some visual interest to otherwise relatively uninspiring elevations. Block B's massing has been split through the use of different materials, and the fenestration also changes between each half to break up the building. Whilst this creates a somewhat awkward aesthetic between each half it is aided by the relationships with Block C and D. Block C has its massing split through the use of different materials, and the fenestration also changes, in a

comparable way to that of Block B. Whilst this again creates an awkward aesthetic given these blocks are viewed in relation to each other, it does mean at least they do relate to one another.

240. Block D has the same fenestration variations as Blocks B and C but is considered to be more successful given that it has a greater horizontal emphasis. The courtyard which faces east (towards the rear gardens of the adjoining houses) is considered to be lacking interest, given it comprises a large mass of brick interrupted with some fenestration and limited brick detailing. Whilst this elevation would not be readily visible from the public realm, it would be clearly visible from the residential gardens to the east and would present an unattractive elevation. This must be balanced against the positives of the scheme overall.

241. Block E has a design that is of a typical flatted block character which is broken up by a variety of different masses. These create interest and the west elevation follows the design of Blocks B-D. The internal elevations are, as with Block D, considered to be somewhat lacking but given their siting not sufficiently harmful enough to warrant refusal on this basis alone. Block F has a design that features a pleasing symmetrical south elevation with detailing. Whilst not symmetrical the overall approach is continued on the west, northwest and northeast elevations to provide a consistency of appearance for the block

Materials

242. The plans demonstrate a variety of material finishes on the flatted blocks as described above, with brick being the primary material. Brick would also constitute the external finish of the detached houses, with slate style roofs over. The materials proposed, when viewed as a whole, would create a clear palette of materials tying the development together in this part of the site.

Landscaping

243. A well landscaped area is proposed to the south of Blocks E and F, which is the main entrance route to the college. New planting will ring each of the proposed blocks and housing areas. Whilst the main areas of car parking are screened by built form, areas which are more visible are broken up with planting, and the parking subject to planting, would not be considered to dominate this part of the site. A larger landscaped area is proposed in the northern tip of the site which would abut the existing dense woodland screening to help the site blend into this green buffer.

Areas 4 and 5 – southern residential area

Layout

244. The central and southern parcels are located to the south of the main access route. The central section benefits from views over the central green space and is typified by the access road running through the middle of the development with detached and semi-detached units on either side. A further row of semi's is turned through 90 degrees to address the access from Caenwood Close. Further south

is the southern parcel which has been laid out in a circular fashion with detached properties around the edge and semis within. Multiple properties within these zones are designed to have two frontages with vehicle access from one side and the possibility of pedestrian access from the opposite side which faces outwards. Parking is provided on plot for each unit, bar the row running east to west on the access to Caenwood Lane.

245. The overall designs are simple, and these areas form their own character within a secluded development. The proposal materials are modern, and could have been a number of different options given the fact the development creates its own character. The standalone nature of the development and the layout creates interesting neighbourhoods and addresses the green spaces and accesses.

246. The roads running through this part of site have some deviations so that it does not appear uniform and repetitive. The houses sit at angles to those on the opposite side of the street to provide some visual distinctiveness, which is preferable to a 'typical' new building housing estate which often have repetitive and uninspiring layouts. The positions and siting of gardens to serve the dwellings, given the variety in design, which sometimes sees these areas set to the side of the dwellings, again provides more variety to the layout. This housing area, given its physical separation from other areas of the site, and screening also afforded by existing and proposed trees/planting, means it would essentially set its own character. The layout provides a recognisable street layout whilst demonstrating some variety to create distinctiveness.

Height and Massing

247. The majority of the houses in the central and southern areas are two storeys in height, with a pitched roof over. Whilst the roof pitch is relatively steep, they appear in proportion to the dwellings as a whole. There are some three storey dwellings within these parcels, which are primarily sited on the western edges of both areas. Whilst this scale of house isn't typical for the area outside the site, given the enclosed nature of the site itself, a larger dwelling isn't considered to be harmful. It is noted that these larger dwellings are sited on the western edge of the parcels abutting the large landscaped areas so their scale is somewhat diluted by this setting. The houses comprise a mix of detached and semi-detached, and in conjunction with their heights the massing of the units is considered to sit comfortably in the site.

248. Landscape and green areas sit beside these parcels, providing a level of screening from wider views. The houses on the eastern tip of this area (adjoining the footpath access towards the rail line) are in closest proximity to exiting residential dwellings (those in Caenwood Close), but there is still a substantial separation, and existing garage blocks provide a further screen and transition between existing and proposed built form. New houses in the southernmost tip of the site are considered to be partially visible from the south, either from the trainline or roads further south, but given the distance of the views, intervening trees and changes in land levels, views of dwellings themselves aren't considered to be harmful.

Appearance

249. The dwellings in these parcels have a consistent appearance, being a recognised domestic house form over two or three stories with pitched roofs. As already noted the pitched roofs are steeper than a 'traditional' house, but when applied across the parcels, they would not appear out of character as there would be consistency in approach. The dwellings would follow a set number of house types, so there would be some repetition in design/appearance, but the types have been mixed throughout, to break up as much as possible, any repetition, although this will be present in places. Some repetition is a natural part of housebuilding on this scale, and the appearance of the dwellings when viewed as whole would create an area of a distinct character and pattern.

Materials

250. Whilst the officers' preference would be for more traditional materials, that is not the 'character' the development is seeking. The materials palette for the dwellings is mixed, comprising primarily of brick and tile, but a number of dwellings feature fibre cement timber effect vertical boarding, hanging tiles and terraces/railings. Officers are concerned about the quality of the materials and that their use will not result in a high class development. Whilst details of final materials can be conditioned the applicant's choice is sufficiently clear to understand the appearance of the dwellings. This matter will form part of the overall planning balance of the scheme.

Landscaping

251. The areas around these housing parcels feature a comprehensive landscaping scheme to allow the development to integrate with this part of the existing site, almost all of which is currently undeveloped. The design includes areas of landscaping along road frontages to aid in breaking up the appearance of parked cars and other associated domestic paraphernalia. The scheme includes a footpath which runs along the western edges of the residential areas, which leads to an open park area at the southern tip of the development. A path then wraps around the eastern side of the southern parcel and leads to the access road to the central part of the parcel. The paths proposed will allow residents and the public to utilise the existing parkland setting, adjoining SANG and public open spaces, and can be also be used by those persons walking into the site from the railway station.

Summary

252. Whilst parts of the development have been found to be either lacking in quality, by virtue of either the design of certain elements or use of materials, the scheme overall provides a comprehensive development of the entire site, comprising both educational and residential uses. The design proposed splits the site into 'areas' which have been assessed in regard to their layout, appearance, materials and landscaping. Assessing the development as a whole, the design is considered to an acceptable method to develop the site, providing a much

improved educational campus for current and future use, and the benefit of a large number of residential units, split between flats and housing. A site of this nature has the ability to set its own character, given its isolated setting, and limited views from outside the site. The existing Listed Building on the site would be altered to introduce some of its earlier features and converted to a residential use. The removal of existing attached college buildings would restore its original detached nature and better reveal its setting. New blocks either side of it are of a considerable scale, but given the increased 'breathing space' around the LB, and removal of existing college buildings, the impact of them is considered to be acceptable. The college campus provides a tighter cluster which creates a more efficient site for educational needs, and the design would be functional to serve this purpose. An improved site entrance would enhance legibility for users. The northern and southern residential parcels, as a whole, provide a number of residential units, contained in both houses and flats, in a variety of tenure. Buildings are of a mix of scales, designs and materials, but there are enough similarities to tie the development together, to form a coherent collection of neighbourhoods. Whilst officers consider improvements to the design could be made, the overall scheme as presented is considered to be of a sufficient overall quality to enable them to offer support to it and that the design complies with Policy CS4 and CS17 of the Core Strategy and Policy DM2 of the Development Management Plan.

The impact on designated and non-designated heritage assets

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

254. Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that 'In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

255. Chapter 16 of the NPPF sets out the framework for decision making in planning applications relating to heritage assets and this assessment takes account of the relevant considerations in these paragraphs. Paragraph 195 sets out that "local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal".

256. Paragraph 199 of the NPPF applies to designated heritage assets. Its states that "when considering the impact of a proposed development on the significance

of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance". This policy reflects the statutory duty in section 66(1). Paragraph 200 goes on to note that "any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification".

257. In relation to non-designated heritage assets, paragraph 203 of the NPPF provides that the effect of an application on such an asset should be taken into account in determining the application and that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

258. Policy DM12 relates to heritage, including areas of high archaeological potential, and in relation to listed buildings states that development within the vicinity of a listed building should preserve or enhance its setting and any features of special architectural or historical interest which it possesses. In relation to conservation areas, Policy DM12 states that development of or affecting the setting of a listed building, should preserve or enhance its setting and any features of special architectural or historic interest. In regard to the change of use of listed buildings, DM12 states development will be approved where the buildings setting, character and special interest would be preserved or enhanced and that consideration will be given to the long term preservation that might be secured through a more viable use.

259. The application site contains a Grade II Listed Building, Brooklands Technical College (former Brooklands House), which is a designated heritage asset. The applicant's submission refers to this building as 'Brooklands Mansion'. The listing description reads as follows: "House, now college. 1860, largely rebuilt in 1891 by Sir Reginald Blomfield in a free Queen Anne style. Brown brick with red brick dressings, plain tiled roofs- hipped to left. Square, lead ogee dome to right and tall stacks under gauged brick cornices. Main house: 5 bays with gable front bay to left, 2 bay wing to left end with flat roofed break to the right linking with tower and 7 bay wing to right, projecting forward to form a courtyard in the re-entrant angle. 3 storeys with attics under 5 pedimented dormers to main block with central segmental pediment and "Venetian" style attic window to gable front bay. Brick quoins to ends with plat bands over ground and first floors and a modillion cornice to the second floor. Irregular fenestration of multi-paned sash windows under gauged brick heads, including a large, round arched staircase window to right and a round window to right hand tower. Double plate glass doors to centre of main block under flat hood, further doors to left in gabled bay. Square clockface in stone surround with cill brackets to court front of tower, rendered tower to rear corner. Lead cupola hood over chimney stack to right. Rear (Garden Front): 6 bays, 2 gabled with 3-light dormers to centre. Large "Venetian" style window to ground floor left with Ionic oilaster surround. C20 extensions to front not included".

260. The main core of the Listed Building was built for Honorable Peter Locke King in 1861-62. There is some doubt concerning the original design of the house, which has previously been attributed to Sir Arthur Blomfield, although other sources claim the house had no formal architect.

261. In 1889, the house's roof began to slip and extensive renovations were undertaken by Sir Reginald Blomfield, namely cosmetic upgrades to the building's elevations including the replacement of old windows with new sash-bar windows, the removal of string courses and dressings and the introduction of new gauged brick dressings. Internally a new staircase was introduced, and the billiard room was altered. Blomfield also extended the north-west service wing to the north. Blomfield's internal and external alterations are reminiscent of the Arts and Crafts Movement, particularly reflecting features employed by Richard Norman Shaw at Cragside in Northumberland.

262. During the early 20th century, the house was converted into a WWI hospital under the leadership of Ethel Locke King and was one of the last in the region to close in 1920.

263. The private ownership of the house and surrounding grounds ended in the mid-20th century when purchased by Surrey County Council in 1949 who opened Weybridge Technical College on the site (later renamed Brooklands College). Alterations associated with the conversion of the house to college use included the removal of the historic entrance and porte-cochere in the north elevation and addition of new, Deco-style entrances, involving some internal reconfiguration. A new main entrance was added to the west of the former entrance and a new students' entrance was located at the junction of the main range and the north former service wing. The principal rooms at ground level were converted to offices, staff room, reading room and library, with the first-floor rooms converted for teaching, lecture and storage rooms. The second and third floor rooms became student dormitories and common rooms. The north and north-west wing housed classrooms, kitchens and cloakrooms.

264. Later additions to the campus include a 1950s north-wing extension, a 1968 Catering Department (to the west of the north-wing extension) and the 1971 Tower Building to the north-east. The 1860s lodge at the mouth of the drive was replaced in the 1960s, although the historic gate piers and boundary walls survive today. The main block was further subdivided in the 1980s to accommodate a growing student population, involving further alterations.

265. Brooklands House is built in a free Queen Anne Revival style, of brown brick with red brick dressings to quoins, plat bands and window surrounds. There is a good degree of intactness, with the original design intent still legible externally. Externally the building is in reasonable condition, although there are signs of deterioration to roof coverings, gutters and rainwater goods, and sections of rot to the deep overhanging eaves cornice.

266. The original gate piers at the principal entrance to the east of the site are the only remaining fragment of the original 1860 entrance (the original lodge was lost in the 20th century) and are curtilage listed.

267. Paragraph 194 of the NPPF sets out that “local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting”.

268. The application is supported by Chapter E Built Heritage, Appendix E1 Heritage Impact Assessment, Appendix E2 Heritage Figures E1-E6, Brooklands Mansion Design and Access Statement and Planning Statement. These documents describe the significance of the Listed Building, which is summarised in the table below.

The significance of the Brooklands Mansion

Value criteria	Scale	Details
Evidential (the potential of a place to yield evidence about past human activity)	**High**	The built fabric and building materials of the house have potential to provide further information about the phased development of the building, as well as evidencing the popularity and availability of different building materials over the various phases of construction. The ceiling and floor build-up of the earlier core features lathe and plaster and lime mortar. Whilst the later Blomfield attic floor similarly features lathe and plaster, it contains sawdust pugging instead of lime mortar, reflecting Blomfield’s efforts to sound proof this level. The interiors also feature some 20th century stud walls and plasterboard partitions, reflecting the birth of plasterboard in the early 20th century and its popular usage as a quicker alternative to lathe and plaster. The cornices provide further evidence relating to the phasing of the building, with the original, flatter cornices found at ground and first floor of a plaster materiality and the later, blocky Blomfield ones typically in timber.
Historical (The ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative)	1860 core: **High** 1890 remodelling: **High** Twentieth century alterations: **Intrusive**	The built fabric of Brooklands House is characterised by various phases of construction, which together contribute to the historic character and value of the Listed Building, however, the earliest two, late 19th century phases draw the highest historic value. As the earliest built element, the 1860 core has considerable significance. The 1860 floor plan is relatively intact at ground, first and second floor level, particularly in the large, south-facing rooms, reflecting both the historic circulation around the former dwelling and the pre-eminence of these rooms benefitting from a

		generous, southern aspect. The principal and secondary stairwells remain in their original position, although the principal stair was replaced by Blomfield, reflecting the historic hierarchy of the building's circulation, with different routes for occupiers and servants. The historic floor plan has been eroded in places, following the modern conversion to college use. The interiors also retain a few surviving 1860 architectural features, including the simple corridor arches in the first and second floor corridors and sections of cornicing, namely in the Library (G11) and first-floor rooms in the main range. As the earliest surviving decorative features, these elements have particularly high historic value, although most of the internal decorative scheme dates to Blomfield's phase of works. The 1890s remodelling has similarly high, if not higher, significance to the original core, following only thirty years after the first phase of construction. Unlike the original core, the second phase was carried out by a renowned architect, garden designer and author, Reginald Blomfield, which brings significant associative value to the building. Blomfield carried out many domestic restorations during this period, including at Chequers, Buckinghamshire, and Apethorpe Palace, Northamptonshire. His work at Brooklands is significant as one of his largest and most significant early renovations, where he employed a free Queen Anne style, before turning to a more serious neo-Georgian style. In adopting the Queen Anne style, the building is representative of a wider late 19th century shift away from the Victorian Gothic and an interest instead in more vernacular building types and materials. Blomfield's Queen Anne language reflects the influence of his notable contemporary, Norman Shaw, providing further associative value. Brooklands shares certain visual connections with Norman Shaw's remodelling at Cragside in Northumberland, in terms of its dynamic roofline, projecting bays and Arts and Crafts interiors. Blomfield's work at Brooklands is contextualised through comparison with the architect's other country house restorations such as Heathfield Park in Sussex (1896-1897) and Brocklesby

		Park (1898). Many internal and external features at these slightly later projects reflect iterations of elements trialled at Brooklands including the steep, dormered roofline, serliana windows and quoining, also evident at Heathfield, and the recurring triumphal arch feature with coffering and prominent keystone, similarly seen in the interiors at Brocklesby. The latter is a feature Blomfield returned to throughout his career, perhaps culminating at the Menin Gate, during his time as one of three principal architects to the Imperial War Graves Commission. The monument employs similar coffering and keystones, on a monumental scale, to his more modest domestic arches. The use of these architectural features at Brooklands, one of Blomfield's earliest domestic renovations, reflects the architect trialling features he would develop at other projects, which contributes to the building's historic value. The late 20th century alterations are of lower historic value relative to the late 19th century phases, however, they are illustrative of the conversion of the Listed Building from private dwelling to college use. This change of use is itself reflective of a wider national context of the decline in fortunes of English country houses as a result of dwindling incomes and the effects of two world wars where many houses suffered a more extreme fate involving entire or partial demolition. Many of the 20th century changes are intrusive to the historic layout of Brooklands namely the subdivision of spaces, including the former entrance hall, which was subdivided into three smaller spaces (G10, G12 &G13), and the introduction of the 1940s entrances, reducing the legibility of the former entrance and circulation around the building.
External aesthetic (The ways in which people draw sensory and intellectual stimulation from a place)	Main range (north and south elevations): **High** North wing (south elevation) and	Both the north and south elevations of Brooklands House play an important role in defining the character of the Listed Building, with the north forming the main frontage and principal approach from the drive and the south serving as the formal garden frontage with the garden terraces laid out below.

	north-west wing (east elevation): **High** North wing (north elevation) and north-west wing (west elevation): **Medium** North wing extension (east and west elevations): **Low** Twentieth century extensions: **Intrusive**	These elevations are enlivened by Blomfield's dynamic Queen Anne style, characterised by projecting bays, small paned sash windows, varied fenestration including lunette windows, and brick detailing to window surrounds, quoins and string coursing. The energetic roofline is particularly distinctive with the steeply pitched roof featuring tall chimney stacks, gable ends and attic dormers with segmental and triangular pediments, all stylistic elements which nod to the work of Norman Shaw. The tower at the west end of the main range forms a dominant feature in both the north and south elevations, its character has been significantly reduced by its truncation and loss of the gabled roof and lantern. The historic character and aesthetic value of the north elevation has also been impacted by the removal of the porte-cochère entrance and the loss of the visual screening of the ancillary parts of the billiard room. The visual appearance of the south elevation is negatively impacted by modern accretions including the detrimental fire escape stair, modern fan coil units and vents, lighting and excessive surface wiring. The gauged brickwork detailing is also damaged in places. The elevations to the billiard room extension and the original north and north-west wings are assigned high significance owing to their characterful Queen Anne detailing, which bears much in common with the north and south elevations of the main range. The character of the east elevation of the north wing is however somewhat compromised by the single-storey 1940s entrance block, obstructing views of this elevation. The north elevation of the north-west wing and the west elevation of the north wing are much simpler in design and detailing, reflecting their historic back-of-house nature and giving these elevations medium aesthetic value. The elevations to the north wing extension have lower aesthetic value. Whilst added by Blomfield in the 1890s, these elevations are much plainer, with limited ornament and a greater extent of modern alteration, including the replacement of historic windows. The north wing extension also

		dilutes the proportions and symmetry of the original core of the north wing. Owing to its considerable length, the extension destabilises the central emphasis of the clock tower, which impacts the appreciation and legibility of the original wing. The 20th century additions to the north and north-west wings detract from the legibility of the building's plan form and dwarf the Mansion House owing to their insensitive scale and massing. They also loom in Key Views from the landscape setting to the south of the house and obstruct all views to and from the buildings from the north. The removal of these extensions would enhance the legibility, character and appearance of the Listed Building.
Interiors Aesthetic (The ways in which people draw sensory and intellectual stimulation from a place)	Main range (G7, G8, G9, G11 & G14): **High** Main range (remaining rooms): **Medium/ Low** North and north-west wings: **Negligible/ Neutral** Twentieth century extensions: **Neutral**	The floor plan, which remains largely intact, is significant in defining the character and aesthetic value of the Listed Building. The layout at each level demonstrates a clear hierarchy with the south-facing rooms adopting more generous proportions and the north-facing rooms typically more modest in size. Certain rooms adopting projecting bay locations are given a slightly higher status to surrounding rooms. Whilst the floor plan has been eroded in localised areas, the extent of modern subdivision is generally limited to lower significance, often north-facing, spaces. The interiors of the main house draw significant aesthetic value from Blomfield's characterful, decorative elements, which are most ornate in the south-facing rooms at ground level, namely G7, G8, G9 & G11. The architect's Queen Anne style is particularly distinctive in the billiard room (G7) through the 17th century style detailing, the inglenook or fireplace recess and bay window. The triumphal arch motif, characterised by coffering, prominent keystones and, on occasions, framing fluted Ionic pilasters, is also a principal feature found across the building. The panelled door architraves and shutter boxes add character, as do the recessed shell niches in G8. These rather weighty, ornamental stylistic elements create a triumphal and exuberant character, which contrasts with the more pared back style of the decorative features remaining

		from the 1860 phase including the plain, arched architraves in the ground, first and second floor corridors and the simple, moulded cornices in certain ground and first-floor rooms, including the library (G11). Whilst less ornate than the ground floor spaces, the first floor rooms in the main range feature good survival of historical decorative features including timber box cornices, skirtings, shutter boxes and architraves. The second and third floors on the other hand have lower aesthetic value, featuring more limited architectural features of note. Various cornices, skirtings and other decorative elements date to the 20th century. Generally, these reference the historic style of earlier features and are of low or neutral significance. The interiors to the north and north-west wings have more limited decorative or architectural features owing to their original service use and subsequent phases of change. Whilst surviving features such as historic cornices, architraves, and skirtings have low level aesthetic value, generally the utilitarian interiors of these wings are of negligible or neutral aesthetic value. Where suspended ceilings are in place these are detrimental to the building's character. The interiors to the 20th century extensions are entirely modern and lack decorative architectural features, giving them neutral aesthetic value.
Communal (The meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory)	**Low**	From 1860 to 1949 Brooklands was in private ownership serving as a family dwelling, a function which alongside its isolated location and surrounding woodland, limited its early communal value. Since conversion to college use in the mid-20th century, the site has been more widely accessed, giving it some communal value to the community of students and teaching staff at the college. The site is not however fully accessible to the public and the Mansion House is not often opened to students, giving it relatively low-level communal value.

269. The significance of the LB's setting includes:

- the formal terraces to the south that created a dramatic stage set for the house that are now in state of deterioration with large parts of it converted to unattractive hardstanding areas;
- the historic drive connecting the Heath Road to the LB;
- original gate piers at the principal entrance.

270. The College grounds contain the locally listed Obelisk in the woodland to the south of the site. The Obelisk was erected in memory of Peter Locke King's father and mother (Peter Locke owned and resided at Brooklands House in 1862). the reasons for the Obelisk's inclusion is due to its rarity, group value (with Brooklands Mansion), architectural value and historic association (with Locke King family and Brooklands).

271. The Hand & Spear Hotel is also a Grade II Listed Building situated approximately 45m to the east of the site. There are also other heritage assets located around the outside of the application boundary, notably the grade II star World Mission Korean Presbyterian Church and the grade II listed 77 Heath Road and its Gatehouse. Plus, there are a handful of locally listed buildings, including Eastlands, No.'s 1 and 2 Rose Cottages, No. 91 Heath Road, Station House and the Bridge House Café and Bar on Heath Road. To the far south is also the Brooklands Conservation Area which includes the Historic Racetrack which is a Scheduled Ancient Monument.

272. There are no designated heritage assets of archaeological interest within the Site. The Scheduled Monuments near the Site (approximately 440m to the south of the Site) include:
- The Brooklands motor racing circuit;
- Remains of the pre-World War II aerodrome;
- World War II Bofors tower and shelters; and
- The Brooklands memorial.

273. The application is accompanied by Listed Building Consent (LBC) application 2023/1333 for the works to the Listed Building. When considering the internal and external works in the LBC report, there are a number of areas where harm has been identified, but also where the works lead to heritage benefits.

274. The area includes Brooklands House (the Mansion) and the new development to its east, plus alterations to the west. The setting of the listed building is vastly altered with the removal of existing buildings which are both connected to its outer wings and others that are in close proximity. The original terrace gardens are also reinstated to the south. To the east of the listed building the new development takes the form of a collection of large outbuildings or stables that may have once served the listed buildings occupants. Set around an internal courtyard the flatted blocks form a rectangular grid that is off set from the listed buildings orientation. To the east the scale of the development is reduced, and new buildings set back from the listed building.

275. Parking is provided for Block K and L and the Mansion to the east and is unfortunately close to the elevation of the listed building. To the west parking is mostly contained with a semi basement that uses the drop in land levels from

north to south to provide access. The access is unfortunate and will be visible in the important views of the listed building.

276. The removal of the existing buildings from the proximity of the Mansion has created an advantage and that has led to the new Blocks outlined above being of greater scale. However, whilst they will alter how the Mansion is seen, the separation means that they are of no greater overall impact. Drawing BA9691-2104 provides a clear understanding of the relationship of the new blocks to the Mansion. Whilst the designs could be improved, their modern simplicity means that they do not complete with the listed building.

277. When assessing the impact on the immediate setting of the listed building it is important to understand the current arrangement and that there are numerous buildings in proximity which are not only harmful in their location but also in the general poor quality of their architecture. It is considered that there would be a neutral impact to the setting of the Mansion (the removal of existing buildings balanced against the scale of the proposals). The works return the southern element to the impressive gardens that have been long lost, and they allow the listed building breathing space, providing a sense of its once vast grounds. This impact would overall be NEUTRAL.

278. The area to the north is separated from the Mansion in a manner that limits its impact. The Mansion predominantly faces south and it is considered that the northern parcel would have no impact on the setting of the Mansion. The college campus however, whilst to the north has a closer relationship. Some of the proposed works have helped remove the college physically. Following officers concerns, the proposed material choice for the Tower building has been amended and now has a more subtle approach which will be less dominant and blend into the tree screening that is close by. The change in material is an improvement and the impact on the setting is considered to be NEUTRAL.

279. With regard to the central and southern parcels, the development would build over the previous open landscaping that was associated with the listed building, effectively enclosing its grounds and the spacious grandeur within which it was originally appreciated. However, it is considered that the listed buildings setting has long been removed from the areas to the east, vegetation has built up and in turn the setting of the listed building has been reduced to an area smaller and closer than it would have been many years ago. It is therefore considered that this section of the proposals would have no impact on the setting of the listed building. The development would retain the current status quo. As such the works would have a NEUTRAL impact.

280. Given the sufficient separation distances and screening in a form of a mature woodland, the proposed development would not result in harm to the other identified designated and non-designated heritage assets or their setting.

281. In line with the Planning (Listed Building and Conservation Area) Act 1990 special regard is given to preserving the heritage assets. The NPPF advises that when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's

conservation. This is also a legal requirement. This report has proceeded on the basis that great weight should therefore be given to the adverse impact referred to above.

282. Paragraph 202 of the NPPF states that "where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

283. As noted in the LBC report, the reinstatement of original features is considered to have a MODERATE to MAJOR BENEFICIAL impact. The Listed Building is currently vacant with some parts of it being neglected and in disrepair. The proposal would return the building to its original intended use, albeit subdivided into flats. This is considered to be a further benefit and one that would see the building cared for in the longer term for others to enjoy. There are also benefits in the overall renovation of the building, which is in a poor state of repair, having been used as secondary accommodation for many years. Whilst it is noted that this benefit has been mostly created by the current owners and applicants, it is still a fact that the building without these works or some other proposals would continue to fall into disrepair.

284. The heritage harm would therefore be outweighed by the heritage benefits of the scheme to the same heritage asset, the Listed Building. Therefore, the application has a MINOR BENEFICIAL overall impact on the significance of the listed building.

Archaeological implications

285. Paragraph 194 of the NPPF states that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

286. Policy DM12 of the Development Management Plan 2015 states that the proposals for development in the Areas of High Archaeological Potential should take account of the likelihood of heritage assets with archaeological significance being present on the site, provide for positive measures to assess the significance of any such assets, and enhance understanding of their value.

287. The application site lies outside the Brooklands Conservation Area and in close proximity to but not within the AHAP, CSAI and Scheduled Monument, which comprise the Brooklands motor racing circuit, remains of the pre-World War II aerodrome, World War II Bofors tower and shelters, and the Brooklands memorial.

288. The application is supported by the following documents:
- ES Chapter M Archaeology
- ES Appendix M1 - Archaeological Desk Based Assessment prepared by Cotswold Archaeology ref.AN0531

- ES Appendix M2 - Consultation Summary with Archaeological Officer at SCC

289. This ADBA has identified that the site lies within a relatively rich archaeological landscape, and is likely to have been peripheral to settlement activity during the Bronze Age and Iron Age. There is also some potential for early prehistoric and Romano-British activity within the site. From the medieval period onwards, the site is thought to have been located within a large estate away from the centre of Weybridge, likely comprising woodland or agricultural land. In the late 19th century, the Site formed Brooklands country estate, until it was redeveloped as a college in the late 1940s. Any features associated with the former estate encountered during the development would be of limited historical value.

290. The ADBA advises that development within the site would be likely to result in impacts on below ground archaeological remains where present within the footprint of the development. However, there is low potential for survival of archaeological features across large portions of the site, due to significant modern impact. There remains a slight potential for the survival of archaeological remains within the site, in areas undisturbed by activities associated with landfill and construction.

291. The SCC Archaeological Officer has reviewed the proposal and advised that three areas where archaeological remains have the potential to exist have been identified as shown in the below figure.

292. The SCC Archaeological Officer has also advised that the impacts of the development proposals on potential heritage assets within the identified areas highlighted in green should be mitigated to facilitate the development. In view of the nature and scale of the development and the low likelihood of the potential archaeology, should it exist, meriting preservation in situ, field evaluation through trial trenching would represent an appropriate initial phase of work in order to determine the archaeological potential and levels of previous truncation and the need for any further phases of work.

293. A pre-commencement condition has therefore been recommended securing the implementation of a programme of archaeological work in accordance with a written scheme of investigation. This condition is necessary to mitigate the impacts of the development on archaeological remains. It is noted that no new development is proposed within the identified areas labelled 1 and 2, as such, it is not necessary to implement a scheme of works over those areas. In addition, the

rest of the development outside the identified areas in green can proceed without further archaeological mitigation.

294. Subject to further archaeological work that would be secured by the suggested condition, the development proposals would ensure the preservation of any archaeological remains that might be present within the application site. The proposal therefore complies with Policy DM12 of the Development Management Plan 2015 and the NPPF 2023.

Impact on neighbouring amenity

295. Paragraph 130(f) of the NPPF requires developments to create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. One of the key characteristics in the National Design Guide (NDG) is, Homes and buildings – functional, healthy and sustainable for occupiers and the surrounds.

296. Policy DM2 (Design and amenity) sets out that development proposals should protect the amenity of adjoining and potential occupiers and users and be designed to offer an appropriate outlook and provide adequate daylight, sunlight and privacy.

297. Policy DM3 (Mixed uses) states that mixed use development should be appropriate to the character of the area and ensure that the proposed uses are compatible with one another and existing uses nearby.

298. Paragraph 4.60 of the Design and Character SPD 2012 states that a useful tool to assess the effect of new development on neighbours' amenity and to influence the siting of new buildings is to apply the '45 degree rule' which outlines that an acceptable relationship between buildings is achieved when new single storey development positioned further than 8 metres from the existing dwelling and the two storey element further than 15 metres when located within a 90 degree arc from the edges of main windows to habitable rooms. It also recommends that in suburban contexts, a notional degree of visual privacy is achieved through the conventional requirement to ensure about 22 metres between rear elevations facing each other.

299. The closest neighbouring properties affected by the proposed development are Rogues Roost to the north of the site and the residential properties in the Lockstone Estate to the west of the site and Caenwood Close to the east of the site. To the north of the site is also Heathside School and to the south is the Weybridge Station car park and railway.

300. The closest development to the residential properties in the Lockstone Estate would be apartment blocks K and L, which would be located over 60m away. Given the significant separation distances and intervening mature woodland, the development would not result in loss of light, overbearing impact or loss of privacy in relation to the occupants of these neighbouring residential properties.

301. The Local Area of Play in the northern parcel would be located approximately 95m away from Rogues Roost. Block D and houses D 18-21 H would be the closest built form to this neighbouring property set approximately 130m away. Given the significant separation distances and intervening mature woodland, the development would not result in loss of light, overbearing impact or loss of privacy in relation to the occupants of this neighbouring residential property.

302. It is noted that existing woodland that currently screens the site from the neighbouring properties in Caenwood Close would be removed to make way for new houses H 12-22 H. Whilst this would open up the site and the new properties would be visible from the neighbouring properties in Caenwood Close, the new houses would be located well in excess of 22m from the neighbouring buildings in Caenwood Close. This would ensure that the development does not result in loss of light, overbearing impact or loss of privacy to the occupants of the residential properties in Caenwood Close. It should be noted that loss of a view is not a material planning consideration.

303. New houses H 01-11 H would also be located in excess of 22m from the neighbouring buildings in Caenwood Close. In addition, the existing mature woodland along the site boundary would be retained. As such, these new houses would not give rise to any detrimental impact on the residential amenities of neighbouring properties in Caenwood Close in terms of loss of light, overbearing impact or loss of privacy.

304. Given the above, the proposed development would not result in loss of light, overbearing impact or loss of privacy to the occupants of the adjacent neighbouring residential properties. The impacts of pollution including noise, light pollution and air quality are discussed in the 'Pollution' chapter. The proposal therefore complies with Policy DM2 of the Development Management Plan and the Design and Character SPD.

Quality of proposed residential accommodation

305. Policy DM10 (New Housing) indicates that proposals for new housing development will be expected to offer an appropriate standard of living, internally and externally in line with national space standards. It further indicates that residential accommodation should offer residents an appropriate level of light, outlook and amenity, including gardens or outdoor space, commensurate with the type and location of housing proposed.

306. Policy DM3 (Mixed uses) states that new development should achieve high quality design that creates a pleasant yet functional place for people to live and work. It should offer an appropriate standard of accommodation for the types of use proposed, including providing adequate outlook, privacy, ventilation and prevention of nuisance from commercial to residential uses.'

Minimum space standards

307. All of the proposed units would exceed the nationally described space standards in terms of the total gross internal floor areas as set out in the table below.

House type	Number of bedrooms/ Occupancy	GIA, sqm	Storeys	Space standards minimum GIA, sqm
Apartments	1B2P	50 - 51.2	1 storey	50
Apartments	2B4P	70 – 82.5	1 storey	70
Brooklands Mansion Apartment 1	2B4P	197.6	1 storey	70
Brooklands Mansion Apartment 2	2B4P	101.7	1 storey	70
Brooklands Mansion Apartment 3	1B2P	90.7	1 storey	50
Brooklands Mansion Apartment 4	2B4P	112.9	1 storey	70
Brooklands Mansion Apartment 5	2B4P/2B3P	93	2 storeys	79
Brooklands Mansion Apartment 6	1B2P	55.6	1 storey	50
Brooklands Mansion Apartment 7	2B4P	97.6	1 storey	70
Brooklands Mansion Apartment 8	1B2P	85.7	1 storey	50
Brooklands Mansion Apartment 9	1B2P	73.3	1 storey	50
Brooklands Mansion Apartment 10	2B4P	102.2	1 storey	70
Brooklands Mansion Apartment 11	1B2P	55.5	1 storey	50
Brooklands Mansion Apartment 12	2B4P	101.3	1 storey	70
Brooklands Mansion Apartment 13	1B2P	74.3	1 storey	50

Brooklands Mansion Apartment 14	2B4P	122.2	1 storey	70
Brooklands Mansion Apartment 15	1B2P	76	1 storey	50
House Type 1	3B5P	105.3 sqm	2 storeys	93
House Type 2	3B4P	100.8 sqm	2 storeys	84
House Type 3	3B4P	102.2	2 storeys	84
House Type 4	3B5P	128.1	2 storeys	93
House Type 5	3B5P	119.2	2 storeys	93
House Type 6	3B5P	118.9	2 storeys	93
House Type 7	3B5P	114.7	2 storeys	93
House Type 8	4B7P	156.6	3 storeys	121
House Type 9	4B6P	147.3	3 storeys	112
House Type 10	4B6P	136.2	3 storeys	112
House Type 11	4B8P	149.5	3 storeys	130
Gate House	3B4P	91.9	2 storeys	84

308. In terms of the minimum bedroom size, each property would be provided with at least one double (or twin) bedroom, which would have a floor area of at least 11.5sqm and a width of at least 2.75m. All other bedrooms except for two bedrooms would exceed the minimum size standards for double (twin) bedrooms (floor area of at least 11.5sqm and a width of at least 2.55m) and single bedrooms (floor area of at least 7.5sqm and a width of at least 2.15m).

309. The floor plans suggest that bedroom 1 of Flat 5 within the Brooklands Mansion would have double occupancy but would have a floor area of 11sqm. Whilst not meeting the space standards for double occupancy, the bedroom would be big enough to accommodate single occupancy and is therefore considered to be acceptable.

310. Bedroom 3 of the Gate House would have a floor area of 6.3sqm, which is below the minimum requirements for a single occupancy bedroom. Whilst not meeting the nationally described space standards in this regard, the building is proposed to be converted back to its original residential use and, it is acknowledged that its construction pre-dated the current space standards. In addition, the total gross internal floor area for the dwelling would sufficiently exceed the minimum requirements.

311. All of the proposed bedrooms and units would benefit from sufficient in-built storage. It is noted that this provision is slightly less for the Gate House, but this is considered acceptable given the constraints detailed above.

Outlook and overlooking

312. All of the proposed habitable rooms would be served by windows. Most of the windows would have an outlook onto the woodland and areas of open space or other residential properties or their gardens, which is common in suburban areas.

313. Some flats would have an outlook onto parking areas, which would be soften by the proposed landscaping scheme. Full details of the proposed landscaping scheme would be secured by a condition.

314. Defensible spaces through appropriate landscaping have been incorporated into the design of the proposal for the ground floor apartments.

315. Most of the apartment blocks and houses would feature separation distances in excess of 22m, particularly at first floor level. Where the separation distances are below 22m, in most cases the building and/or windows are either staggered or face the windows serving communal areas. This aids in preventing direct overlooking and loss of privacy. The exceptions to these are discussed below.

316. The eastern elevation of Block D would be located approximately 11.7m from the rear garden of house D 28 H and 12.6m from the rear garden of house D 18 H. Given that the windows on this elevation would serve communal corridors, they are not considered to result in materially harmful loss of privacy or overlooking of the aforementioned rear gardens.

317. The corner units in Blocks E and F feature windows directly opposite each other. These windows would serve a kitchen and living room but would not be the primary windows into the open plan rooms, as such, this relationship can be accepted.

318. Block K features a first floor window serving a bathroom that would directly face the kitchen/dining/living room of the apartment within the Brooklands Mansion. This is considered acceptable given that the separation distance at 20m is close to 22m and the bathroom window is likely to be obscure-glazed.

319. The upper floor windows on the south eastern elevation of Block H serving the wardrobe areas in the bedrooms can be conditioned to be obscure-glazed given then 14.5m separation distance from the bedroom windows of Block G.

320. The separation distance of 20m between blocks H and I is considered to be sufficient enough to prevent direct overlooking or loss of privacy.

321. Plot D 22 H would not feature any upper floor windows to the side elevations, so no mutual overlooking or loss of privacy would occur in relation to Plots D 21 H and D 23 H.

322. The back to back separation distances of approximately 19.5 to 25.5 (measured at first floor level) for Plots J 01-18 H are also considered to be representative of suburban areas and are sufficient enough to prevent direct overlooking or loss of privacy.

323. The separation distance between G 01 H and H 0 1H of approximately 19.2m is also considered sufficient enough to prevent overlooking and loss of privacy.

324. The separation distances of 17.6m between G 07 H and H 10 H and 16.9m between I 01 H and J 01 H are not ideal but given the intervening roads and proposed planting are not considered to be materially harmful.

325. Where windows serving non-habitable rooms or as secondary windows in principal rooms have the potential to result in actual or perceived overlooking, these would be conditioned to be obscure-glazed and non-opening.

326. Most of the first floor terraces and balconies would face towards the woodland or the property's own garden. Where potential for overlooking of other properties' gardens exist, details of privacy screen would be secured by appropriately worded condition.

Daylight and sunlight to habitable rooms

327. The application is supported by a Daylight and Sunlight Report. The document was updated to include the assessment of all of the habitable rooms and floors within the apartment blocks rather than only the ground floor of the apartment blocks and a selection of habitable rooms detailed within the original document. It is noted that only the Gate House has been excluded from the assessment, which is considered acceptable given that the proposal seeks to convert it back to its original residential use.

328. NPPF paragraph 125c) reads "…when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight where they would otherwise inhibit making efficient use of a site, (as long as the resulting scheme would provide acceptable living standards)".

329. The updated Daylight and Sunlight Report sets out that 93% of all rooms would achieve or surpass their minimum winter illuminance recommendations with 75 out of the 1069 rooms falling short of the targets. It also notes that the compliance can be improved further reducing the size of the balcony overhangs and subdividing the open plan living/dining/kitchens to create internal non-daylit kitchens, which are permissible under the BRE guidance. It is noted this would compromise the amenity derived from having balconies and modern open plan living/dining/kitchens.

330. It is also noted that the revised Daylight and Sunlight Assessment has applied the requirement of 150 lux instead of 200 lux for rooms with shared use such as living/dining/kitchen area. The BRE guidance sets out that "where a room has a shared use, the highest target should apply". However, it also sets out that Local Authorities could use discretion here: "the target for a living room could be used for a combined living/dining/kitchen area if the kitchens are not treated as habitable spaces, as it may avoid small separate kitchens in a design. The kitchen space would still need to be included in the assessment area". Having reviewed the floor plans, the kitchens in this case could be separated into smaller separate rooms, which would improve the compliance rate but would compromise the modern open plan living. As such, the 150 lux requirement can be accepted in this case.

331. In terms of sunlight exposure, 253 (or 79%) of the 319 units (excluding the Gate House) would have at least one habitable room window which faces within 90 degrees of due south. 243 (or 76%) units would have a living room window which faces within 90 degrees of due south. Whilst these are slightly below what the Council would normally expect, the mature woodland setting of the site is recognised in this instance. When considering the deciduous trees as opaque objects, 277 (or 87%) of the 319 units would have a habitable room which receives a total of at least 1.5 hours of sunlight on 21 March.

Outdoor amenity areas

332. As demonstrated on Landscape Boundary Treatment plan DE 499_PL_211 Rev A, some of the ground floor units in apartment Blocks E, F, K and L as well as the Brooklands Mansion would feature private outdoor amenity areas. Some apartment blocks would also benefit from communal outdoor amenity areas. In addition, balconies are incorporated for the proposed apartments.

333. All of the proposed houses would benefit from a private outdoor amenity area. The converted Gate House would benefit from a rear garden with its depth exceeding 11m. It is noted that for the proposed 82 new built houses, not every garden would have a depth in excess of 11m. The breakdown of these is detailed in the table below.

Parcel	Below 10m, number of gardens	Below 11m, number of gardens	Over 11m, number of gardens
Northern	0	1	10
Central	4	5	22
Southern	8	7	25
Total number of gardens	12	13	57
Proportion	14.6%	15.85%	69.5%

334. From the table above, it can be seen that around 30.5% of the proposed 82 rear gardens would have a depth below 11m. Whilst this is not ideal, this provision can be accepted in this case given the woodland setting of the site and the proposed SANG and open space areas including playgrounds. In addition, the smaller gardens would serve the smaller houses, whereas the proposed larger homes would benefit from rear gardens exceeding 11m in depth.

335. The Daylight and Sunlight report has also considered overshadowing of gardens with and without the surrounding woodland and trees being taken into account. In line with the BRE guidance, for an open space to appear adequately lit throughout the year, at least 50% of its area should receive two hours of sunlight on 21st March. The Daylight and Sunlight report has tested 83 gardens including the gardens of the houses and the Brooklands Mansion. Out of the 83 gardens tested, 31 (or 37%) fall short of the BRE criteria both with and without

trees included. The resultant compliance rate of 63% is considered to be low. However, the natural constraints of the site are noted as well as the available areas of open space on the site that would be retained and maintained.

Conclusion on the quality of proposed residential accommodation

336. The proposed residential units would comply with the minimum space standards and would achieve adequate levels of daylight. There are areas, which fall below the Council's preference, such as the depth of the gardens and levels of sunlight to habitable rooms and gardens. It is recognised that this is predominantly influenced by the woodland setting of the site, which in itself, would offer additional benefits to the future residents together with the proposed provision of open space and playgrounds. As such, on balance the quality of the proposed residential accommodation is considered to be adequate enough to not warrant refusal on these grounds.

Impact on safety, highways and parking

337. Paragraph 110 of the NPPF sets out in assessing specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

338. Paragraph 111 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

339. Paragraph 112 advises that applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

340. Paragraph 113 goes on to state that developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

341. The Surrey Transport Plan 2022-2032 (LTP4) contains numerous strategies, such as a Sustainable Modes of Travel to School Strategy, Surrey Cycling Strategy, Parking Guidance for new developments, Rights of Way Improvement Plan and others. The LTP4's vision is to significantly reduce transport carbon emissions to meet the net zero challenge and to support delivery of Surrey's other priority objectives of enhancing Surrey's economy and communities, as well as the health and quality of life of the residents.

342. One of the objectives of the Core Strategy is to reduce people's reliance on driving, by directing new development to sustainable locations, promoting attractive and convenient alternatives, including public transport, and in doing so reducing congestion and pollution caused by traffic. The Core Strategy aims to minimise the effect of trips by encouraging new development in accessible locations, encouraging use of sustainable transport modes and applying maximum parking standards.

343. In accordance with Policy CS25 (Travel and Accessibility) the Council will promote improvements to sustainable travel, and accessibility to services, through a variety of measures by:

- Directing new development that generate a high number of trips to previously developed land in sustainable locations within the urban area. These include town centres and areas with good public transport accessibility as outlined in national policy.
- Applying maximum parking standards to all uses, including the consideration of zero parking for certain town centre developments.
- Requiring a transport assessment and travel plan for all major scale development proposals, in order to promote the delivery and use of sustainable transport.
- Protecting existing footpaths, cycleways and bridleways; delivering new cycling and walking schemes; and supporting development that increases permeability and connectivity within and outside the urban area.
- Improving transport infrastructure […].
- Improving the environmental impact of transport - the Council will seek to mitigate the detrimental environmental effects caused by transport, particularly with regards to HGVs, through a variety of measures, which may include greening the roadside and parking environment, improving air quality, noise reduction measures and traffic calming. Support will be given to schemes that help to meet the commitments contained in the Elmbridge Air Quality Strategy.

344. Policy DM7 (Access and Parking) sets out the Council's requirements in terms of access and parking:

a. Access
   i. The layout and siting of accesses should be acceptable in terms of amenity, capacity, safety, pollution, noise and visual impact.
   ii. Access to and from the highway should be safe and convenient for pedestrians, cyclists and motorists.
   iii. Provisions for loading, unloading and the turning of service vehicles are expected to be designed into the scheme ensuring highway and pedestrian safety.
   iv. The proposal should minimise the impact of vehicle and traffic nuisance, particularly in residential areas and other sensitive areas.

b. Parking
   i. The proposed parking provision should be appropriate to the development and not result in an increase in on-street parking stress that would be detrimental to the amenities of local residents. In such instances, a minimum provision of one space per residential unit will be required.
   ii. Garaging, cycle stores and car parking designs should be integrated into the scheme and respect the character of the area.
   iii. Hardstanding should be designed and constructed with permeable (or porous) surfacing. Impermeable paving should be limited and the use of soft landscape maximised.
   iv. Provision of car, cycle and disabled parking should accord with the Elmbridge Parking Standards at Appendix 1.

345. The application is supported by the following documents:
- Chapter G: Transport prepared by Lichfields dates April 2023
- Appendix G1: Transport Assessment prepared by Curtins dated 04th May 2023
- Appendix G2: Interim College Travel Plan
- Appendix G3: Interim Residential Travel Plan
- Appendix G4: Delivery and Servicing Management Plan
- Appendix G5: Outline Construction Logistics Plan
- Technical Note prepared by Curtins dated 04th July 2023
- Technical Note prepared by Curtins dated 07th August 2023
- Technical Note prepared by Curtins dated 06th November 2023

346. The site is located within the Green Belt adjacent to the built-up area of Weybridge. The site is located a four-minute cycle, nine-minute bus ride, and 16-minute walk away from central Weybridge. Weybridge Railway Station is located approximately 800m southeast of the Site.

347. Nearby key routes are the B374 Heath Road to the east; Brooklands Lane to the north and west; the B373 Hanger Hill to the southeast; and the B317 Balfour Road/Weybridge Road to the north. The nearest M25 junction is an 8-12 minute drive (non-peak) and a 12-22 minute drive (peak hours).

348. The Site is equally situated circa 230m from two bus stops: Elgin Road and Weybridge Railway Station North; they are each a four-minute walk away.

349. The nearest NHS health centre is located is located within a 15-minute walk, 13-minute bus journey and four minute cycle of the Site.

350. St. Charles Borromeo Catholic Primary School is an 18-minute walk away while secondary school Heathside is 12-minute walk away on main roads or nine minutes via footways through Brooklands College.

351. Overall, good opportunities for active travel modes exist, however, existing connecting infrastructure is relatively poor.

Vehicular access

352. The site is served by two vehicle access points. One from Heath Road which operates as the main vehicular entrance to the College and the second from Brooklands Lane. The main site access road is approximately 4.5-5m wide, with 1.8m wide footways along the southern and northern sides of the carriageway. It passes through a gated access which narrows to approximately 4.1m wide. As a result, priority is given to inbound traffic movements. Vehicles exiting the site give way to oncoming traffic.

353. The secondary access from Brooklands Lane is formed of a single carriageway road and is approximately 4.7m wide for its duration. The access is intended for vehicles only, and therefore no footways are present. The operation of the rear site access facilitates emergency access and is limited to a small number of servicing vehicles and certain key events such as parents evening and opening days and subsequently remains locked for the remainder of the time.

354. The existing main access from Heath Road is proposed to be retained. The access from Brooklands Lane would remain as a secondary access point. During the construction of the development, vehicles would arrive to the site via Heath Road and would be prohibited from using Brooklands Lane. This can be secured as part of the Construction Transport Management Plan (CTMP).

355. Once within the site, the existing central access road would be maintained through the site to the main College campus with branches off to serve separate elements of the scheme. It is proposed that the internal road network would be private and would not to be offered for adoption.

356. The existing central spine road ranges between 4.2m and 6.2m, with the narrowest section located adjacent to the Mansion Building. Footways are provided on both sides of the carriageway for the duration of the route. The speed limit is currently 10mph and this would be retained as part of the development proposals. Raised tables are proposed at junctions and crossing locations to reduce the speed of vehicles travelling along the spine road.

357. The northern access junction from the central spine road would facilitate vehicle movements towards the main College point of arrival, sports

hall/community hub and residential units within the northern parcel. The southern access would provide access to residential units and the western access would give entry to the main Collage car parking area and College SEND drop-off location. A separate branch of the access road would also serve the Mansion House and other residential blocks located nearby.

358. The secondary access to the College from Brooklands Lane would be used less frequently for Air cadets Instructors and waste collections. No member of staff or visitor would be authorised to use this route to gain entry. Also, it would not connect to the routes serving the proposed residential properties.

359. Detailed swept path analysis has been provided along with junction visibility and forward visibility splays. This information has been reviewed by SCC in their role as a County Highway Authority (CHA).

360. In line with the CHA's request, additional swept path analysis have been provided for Heath Rd/site access junction and Brooklands Lane/secondary access junction taking into account the 10.4m long refuse vehicle.

361. Waste collection associated with the proposed development would be accessed via the internal road network. All of the vehicle access routes would be 4m wide needed for refuse vehicles. The undercroft of Block H-J would also be tall enough for refuse vehicles to pass. Turning heads have been incorporated throughout the development proposals to support vehicles entering and exiting the site in forward gear.

Pedestrian and cycle links

362. There are a number of existing pedestrian accesses that assist movement from the south, east and north to reach the main entrance to Brooklands College. These vary from footways provided alongside main roads to dedicated segregated pedestrian links. However, there are no existing Public Rights of Way (PRoW) through the site.

363. A local cycleway is accessible from Heath Road and connecting to Byfleet. A shared cycle/pedestrian route runs along the B374 Heath Road.

364. The proposal seeks to improve the pedestrian and cycle access to the site by opening the site up to the public. An active travel infrastructure is proposed that would create an interconnected pedestrian and cycle network across the site. The key pedestrian and cycle route through the site is proposed to be adopted by SCC to ensure that it is available in perpetuity.

365. The campus would be accessed through the Brooklands College Entrance Atrium via the secure line. Once permitted into the site, all buildings would be accessed through the main entrances facing into the central quad areas with secondary means of access/escape facing the site perimeter. Public access would not be provided into the retained Brooklands College campus with a secure fence line proposed to ensure the College is safe and secure. However, as noted above, some facilities (e.g. Sports Hall, Community Hub, restaurant, etc.) would

have controlled access from outside of the secure line for the integration of the College and community and members of the public to benefit from the College's service offerings.

366. The new infrastructure involves the creation of a publicly accessible SANG with a dedicated car park and walking routes within the SANG and the rest of the woodland.

367. Another key route proposed to be brought forward involves the reinstatement of a historic pedestrian bridge owned by Network Rail over the railway line to the south of the Site (outside of the red line boundary). This would provide a new north to south pedestrian route through the site, aiding connectivity towards Weybridge Town Centre and Brooklands Museum. Discussions have been ongoing with Network Rail as the applicant is keen to provide this link. However, it should be noted that the success of this provision is dependent on Network Rail as the owner of the bridge. Further details on this are provided in the 'on-site and off-site highway improvements and contributions' part.

368. A new link between the site and Heathside School is also to be created, allowing students and parents to utilise pedestrian/cyclist access through the Brooklands College site. This will be a gated and controlled access, operated by Heathside school, with access outside of school arrival and departure times prohibited. The details of this can be secured by a condition.

369. A new pedestrian and cycle link is proposed through the south-eastern section of the site to enhance connectivity to Weybridge Railway Station.

370. The footways would be wide with a minimum width of 2m to serve pedestrians of varying abilities and visual impairments. Street lighting (except for the SANG due to ecological reasons) would be provided, along with dropped kerbs, tactile paving and designated pedestrian crossing points. Consideration has also been given to the key desire lines and permeability for the College staff and students as well as future residents and members of the public.

Parking provision

371. The table below sets out the maximum parking requirements as detailed in Appendix 1 of the Development Management Plan.

Use class	**EBC - Maximum car parking provision**	**SCC - Maximum car parking provision**
Non-residential		
Colleges	Individual assessment OR justification	Individual assessment OR justification
Community centres	1 car space per 3 persons OR per 3 seats OR per 20 m2 OR Individual assessment or justification	1 car space per 3 persons OR per 3 seats or per 20 square metres OR individual assessment OR justification

Health club	Individual assessment OR justification	Individual assessment OR justification
Residential - Suburban		
1 bed unit	1 space per unit	1 space per unit
2 bed unit	1.5 spaces per unit	1 space per unit*
3 bed unit	2 spaces per unit	2+ spaces per unit**
4+ bed unit	2 spaces per unit	2+ spaces per unit**

*applies to 2 bed flats

**where space permits, it may be appropriate to consider increased provision

372. Policy DM7 also sets out that in areas of parking stress, the Council would expect a minimum of 1 space per residential unit. In addition, where space permits, it may be appropriate to consider provision for visitors in suburban areas.

373. SCC also require 1 fast charge socket per house or apartment with 7 kilowatt Mode 3 with Type 2 Connector and 230 volts AC 32 Amp Single Phase dedicated supply.

374. For commercial developments SCC require 20% of available spaces to be fitted with a fast charge socket (with 7 kilowatt Mode 3 with Type 2 Connector and 230 volts AC 32 Amp Single Phase dedicated supply), plus a further 20% of available spaces to be provided with power supply to provide additional fast charge socket (with feeder pillar or equivalent permitting future connection and 230 volts AC 32 Amp Single Phase dedicated supply).

375. The Parking SPD 2020 has updated the Council's requirements for electric vehicle charging points. One fast charge socket is required for each new house. For flats/apartments 20% of available spaces are required to be fitted with a fast charge socket. For large commercial/mixed use development requiring a Travel Plan, the requirement is 3% of available spaces to be fitted with a Fast charge socket, plus 2% of available spaces to be fitted with a fast charging point.

376. The application is supported by parking Allocation Plan Ba9691-2063 Rev C. A total of 550 car parking spaces is proposed for the entire development. The breakdown is detailed below.

377. The applicant's Transport Assessment offers a review of Controlled Parking Zones, which indicates that all roads situated within a 500m walking distance from the proposed residential units are subject to a controlled parking zones implemented by SCC. Furthermore, no on-street car parking capacity is physically available due to narrow widths of carriageways or are private roads whereby parking is prohibited.

Parking provision for the College including Sports Hall/Community Hub

378. The College benefits from existing car park comprising 525 spaces: 203 staff spaces, 311 student spaces; 3 visitor spaces and 8 designated blue badge bays. A parking survey has been carried out for the site detailing that during peak hours on-site parking equated to around 33% (173 spaces) of total capacity.

379. The number of car parking spaces proposed for the College elements of the development equates to 164 car parking spaces (123 for staff and 41 for students/visitors). Of these, 5% (8 spaces) would be designated as accessible, blue badge spaces. This is a reduction of 361 car parking spaces from the existing provision at the site or 5% decrease in the maximum potential car parking occupancy on the site.

380. The 164 parking spaces include 41 car parking spaces, which are to be provided within the sports hall car park, inclusive of two blue badge parking bays. It is envisaged that these would be used by students and visitors to the College during the College operational hours. Outside of these hours, the car park would facilitate visitors to the sports hall and community use. Access to the sports hall car park would be security controlled.

381. The College is planning to introduce a parking permit system whereby student parking is allocated to those who have a need to travel to the college by car (e.g. due to restricted opportunities for those attending very specialist provision from outside the College's immediate area or disability). Staff car parking is also proposed to be managed and coordinated through a parking permit scheme. This would be secured by a Travel Plan condition that would also require the promotion of sustainable travel modes.

382. The CHA has welcomed the College's plan to introduce a permit system that would facilitate transport 'modal shift' advising that it should form part of policy within the College Travel Plan such that trips and permits can be monitored and controlled. However, they noted that many of the students may need to carry tools and therefore, for some, travel by car or van would be essential. The CHA also noted that the parking survey was carried out at a time when part of the car park was partly barriered off and at exam time recommending that the car parking survey is repeated during term time. The College has confirmed that the surveys reflect typical car parking conditions at the site for the following reasons:

- Brooklands College is not subject to traditional term times/exams times. As such June 2022 was considered a typical week in terms of attendance.
- Due to the Further Education/Vocational nature of the College's activities and curriculum, the structure of the courses is very different to that of traditional Alevel/academic courses.
- Significant components of the final assessment is based upon course work, self-directed projects, interim assessments (of skills, English and Maths etc) and due to the vocational nature of the qualifications work experience, training and placement opportunities are integrated into the programmes and assessed throughout the year.

383. The College have also been monitoring student car parking on site periodically through the recent (summer 2023) term and at present numbers are ranging between 40 and 50 cars per day for students. Therefore, they are confident that the results of the parking beat survey completed in 2022 is representative of the situation and is supported by the proposed student car parking provision at the site.

384. The CHA raised no objection to the development subject to conditions and on-site and off-site highway improvements and contributions. These include securing a Travel Plan for the College and for 20% of the car parking spaces for the College to be fitted with a EV charging point.

Parking provision for residential units

385. The table below details the maximum car parking requirement for the proposed development.

Unit size	Number of units	EBC - Maximum parking requirement, number of spaces	SCC - Maximum parking requirement, number of spaces	Proposed car parking, number of spaces
1-bed	100	100	100	215*
2-bed	137	205.5	137	
3-bed	55	110	110	166**
4-bed +	28	56	56	
Total	320	471.5	403	381

*apartments
**houses

386. All of the proposed houses would benefit from two dedicated car parking spaces in line with the Council's and SCC's requirements. Blocks A, B, E, K, L, G, H, I and J would have one car parking space allocated per flat. The Brooklands Mansion would have 20 car parking spaces for 15 flats. Block C would have 22 car free plots, Block D would have 1 car free plot and Block F would have 4 car free plots making it 27 car free plots in total. The development would be in line with the SCC's maximum parking standards but would represent an under provision as per the Council's maximum parking standards. However, it should be noted that these standards are for maximum levels and, the site is well located in respect of sustainable public transport facilities being directly adjacent to a bus route and directly to the north-west of Weybridge Station. The site itself is not considered to be located in an area of parking stress. As such, the proposed car parking provision is considered adequate.

387. The CHA have recommended a condition to secure the provision of each dwelling with a fast-charge Electric Vehicle charging point in line with the SCC's standards. This is considered relevant and necessary given that the SCC's standards are more up-to-date that the Council's ones in this respect.

Parking provision for the SANG

388. Natural England's guidance sets out that one car parking space should be provided per ha of SANG, totalling 10 car parking spaces for the development. The SANG car park would be located next to Plot H 22 H and would have 12 spaces allocated to the SANG. However, Natural England have raised concerns

that the car park should be more closely positioned to the SANG. A condition is proposed to allow the position of the car park to be relocated to address Natural England's concerns.

Car Club

389. Two Car Club car parking spaces are to be provided within the site. One to be located next to Plot D 21 H and another one would be located next to Block F. The CHA have also recommended a condition to secure the following:
    - A Car Club for two cars with dedicated Ultra Low Emission Vehicle bays within the site;
    - Appropriate charging points for Ultra Low Vehicle Usage'
    - Residents to be provided with 3-year free membership and £50 free drive time;
    - Car Club to be supported by the developer for a minimum of 3 years.

Cycle store provision

390. The proposal includes 128 cycle parking spaces for the College. The CHA have requested a condition to secure residential cycle parking and also 224 cycle parking spaces for the College. They also request that cycle parking provision should be reviewed as part of respective ongoing Travel Plans.

Impact on the highway safety and network capacity

391. The accompanying Transport Assessment provides a highway and junction safety review that concludes that the volume of recorded accidents is low and that there aren't any significant correlations that would suggest specific design deficiencies on the local highway network that would give rise to any highway safety concerns.

392. The Technical Note prepared by Curtins dated 4th July 2023 was provided to provide the CHA clarification in regards to the trip generation for the proposed development correcting previous inaccuracies. It offers a breakdown of trip generation by each proposed use on the site as well as the total multi-modal trip generation for the development overall presented in the tables below.

Total multi-modal trip generation (residential and college combined)

Travel Mode	AM (08:00 - 09:00)			PM (16:00 - 17:00)		
	In	Out	2-Way	In	Out	2-Way
Walking	51	38	89	18	32	50
Cycling	45	21	66	9	25	34
Bus	14	8	22	4	8	12
Rail	220	130	350	58	130	188
Car sharing	56	24	79	9	32	40
Car driver	160	166	327	85	108	193
Other	5	2	7	1	3	3
Total	**551**	**389**	**940**	**183**	**338**	**521**

**Calculations may not add up due to rounding.*

Net Change Trip Generation

Travel Mode	AM (08:00 - 09:00)			PM (16:00 - 17:00)		
	In	Out	2-Way	In	Out	2-Way
Walking	+21	+24	+45	+13	+11	+24
Cycling	9	11	20	+5	+5	+11
Bus	3	4	7	+2	+2	+5
Rail	+49	+66	+114	+36	+35	+71
Car sharing	+11	+7	+18	+3	+12	+15
Car driver	+17	+112	+129	+67	+28	+96
Other	+1	0	+1	0	0	0
Total	+110	+225	+335	+127	+95	+222

393. The Transport Assessment also modelled the operation of the following junctions and assessed the impact of the development on them:

- Listed Site Access Gates – the assessment concludes that the site access give-way configuration would operate within capacity.
- Heath Road/ Site Access Junction – currently operates within capacity in both AM and PM peak, with 92% residual capacity. The assessment concludes this junction has sufficient capacity to accommodate all the traffic movements associated with the proposed development.
- Church Street (B374)/Balfour Road/Church Street (A317)/Church Lane – currently the junction operates over capacity., with no residual capacity available. The assessment concludes that the proposed development would have a non-material impact on the operation of the junction based on additional 59 vehicles at this junction during the AM peak and 33 in the PM peak (equivalent to circa one vehicle movement every one minute in the AM peak, and circa one vehicle every two minutes during the PM peak).
- Weybridge Station Roundabout – is an unusual junction formed of a cluster of smaller junctions/crossroads, with a roundabout at its centre. The assessment concludes that the proposed development would result in 2% increase in vehicular traffic within the AM and PM peak.
- Brooklands Road/Byfleet Road/Parvis Road – the assessment considered different scenarios taking into account the nearby development at St George's Business Park (2022/2809). The assessment then concluded that that in all development scenarios the

junction would operate well within its theoretical capacity with the minimum residual capacity recorded across all arms and all scenarios was 31%.

394. In line with the SCC's request, the applicant has provided additional information, such as traffic flow distribution and a sensitivity test for the Balfour Road/Church Street/Church Lane roundabout. The CHA has checked the applicant's final traffic flow and traffic modelling information for accuracy. The proposals would have a peak traffic period impact of fewer than 60 vehicles per hour at the nearest junctions on the highway network both north and south of the site. This equates to an impact of fewer than 1 vehicle per minute during the peak hourly periods.

395. The site is well located in respect of sustainable public transport facilities being directly adjacent to a bus route and directly to the north-west of Weybridge Station. Improvements to local cycle infrastructure such as Brooklands Cycle Route have also recently taken place.

396. Consequently, the CHA advised that the proposed development, in itself, is not expected to have any significant, discernible, adverse traffic impacts at nearby junctions or at the site access point. They raised no objection to the development subject to conditions and on-site and off-site improvements and contributions. This includes securing the Construction Transport Management Plan to manage the impacts from traffic during the construction of the development.

Travel plans

397. The application is supported by Interim College and Residential Travel Plans. The CHA also recommend a condition to secure separate Travel Plans for both the residential and College elements. A Travel Plan is a management tool that allows a coordinated strategy to bring together daily travel issues and achieve a more sustainable travel choice. A successfully implemented Travel Plan can offer substantial gains towards the sustainable transport objectives of central and local government.

398. These would be secured by appropriately worded conditions with the aim to secure a set of measures and initiatives to reduce the dependency on single-occupancy vehicles, support the uptake of sustainable travel modes and ensure there are no adverse impact from students, residents or visitors travelling to and from the site.

On-site and off-site highway improvements and contributions

399. In addition to the above, the CHA require the following improvements and contributions:

- Construction or provision of a necessary funding to provide a pedestrian and cycle link across the railway line to the south of the site as well as a provision of a long term, maintenance contribution in respect of the ongoing costs of the bridge link. The developer would also need to fund the making of appropriate

Orders to ensure that the route is available for long term public use. This will be secured by a condition and legal agreement. Network Rail are a current owner of the bridge and, the wording in the S106 agreement will reflect this complication.

- Construction or provision of a necessary funding to a pedestrian and cycle link to connect between the railway bridge to the south of the site and Seven Arches Approach as well as a provision of a long term, maintenance contribution in respect of the ongoing pedestrian and cycle link. The developer would also need to fund the making of appropriate Orders to ensure that the route is available for long term public use. This will be secured by a condition and legal agreement. Thames Water Utilities Ltd are the current owner of the route and, the wording in the S106 agreement will reflect this complication.
- Improvements to the existing southbound bus stop on Heath Road including an increased shelter size and "bus cage" markings as well as an uncontrolled pedestrian crossing point with tactile paving. This would be secured by an appropriately worded condition with a subsequent Section 278 Agreement under the Highways Act 1980.
- A contribution of £50,000 for a highways and transportation feasibility study relating to the nearby junctions of Heath Road/Brooklands Rd/Hanger Hill/Old Heath Rd/Station Approach. This would be secured by a legal agreement.

Conclusion on safety, highways and parking

400. Paragraph 111 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

401. The CHA have reviewed the proposal and advised that the proposed development, in itself, is not expected to have any significant, discernible, adverse traffic impacts at nearby junctions or at the site access point. They raised no objection to it subject to conditions, on-site and off-site highway improvements and contributions. Subject to these conditions, improvements and contributions, the impacts of the development would be adequately mitigated so that the proposal does not result in detrimental impact on safety, highways and parking and satisfactorily contributes to the promotion of sustainable modes of transport. Therefore the proposal is considered to comply with Policies CS25 of the Core Strategy and DM7 of the Development Management Plan.

Impact on trees

402. Paragraph 131 of the NPPF 2023 sets out that trees make an important contribution to the character and quality of urban environments and can help mitigate and adapt to climate change. It also affirms that existing trees should be retained wherever possible.

403. Trees make an important contribution to the character and appearance of the Borough. Policy CS14 (Green Infrastructure) promotes safeguarding of important trees, woodlands and hedgerows and securing provision of soft landscaping measures in new development, focusing on the use of native species, particularly

trees, which are an important feature of the Elmbridge landscape, and taking opportunities to create links with the wider green infrastructure network. It confirms that the Council aims to give a high level of protection to the Borough's green infrastructure network; and that urban trees have an important role in sustainable communities, providing numerous aesthetic, social and health benefits and are a key feature in the Elmbridge landscape. Policy CS15 (Biodiversity) supports protection of woodland, including ancient woodland, from damaging development and land uses.

404. Policy DM6 (Landscape and Trees) requires that the development proposals are designed to include an integral scheme of landscape, tree retention and protection. It confirms that the proposals should not result in loss or damage to trees that are, or are capable of, making a significant contribution to the character or amenity of the area, unless in exceptional circumstances the benefits would outweigh the loss. This policy seeks to adequately protect existing trees including their root systems prior to, during and after the construction process.

405. The application is supported by a Tree Survey, Arboricultural Impact Assessment & Preliminary Method Statement ref. JSL4446_780 Rev F prepared by RPS Group which was updated in October 2023. The document has identified and surveyed 436 individual trees and 22 groups and woodland groups, 2 area of scrub and 2 hedges. The table below details the category of the surveyed trees and woodland.

	Individual trees		Groups	
Category	Total number	% of 436	Total number	% of 29
A	102	23.39%	9	31.03%
B	117	26.83%	8	27.58%
C	164	26.83%	8	27.58%
U	38	8.72%	4	13.79%

406. The site’s tree canopy cover is presented in the table below.

	Total area (sqm)	%
Site area	270,300	100
Individual canopy	33,238	12.29*
Group canopy	132,543	49.03*
Total tree canopy	165,781	61.33

The method of calculation does not account for canopy overlap – actual canopy cover figures are likely to be lower as a result.

407. The site is not within a Conservation Area and, there are no TPO trees on the site. No trees within the site boundaries are identified as ancient woodland. Eight veteran Oak trees were recorded within the woodland, with a further two Notable and a single Ancient Oak also present. In addition, as noted in the tables above, the site benefits from numerous mature trees, groups and woodland groups of high quality, which make a significant positive contribution to the visual amenity and character of the area.

408. As part of the proposal, a significant number of trees have been identified for removal both for good arboricultural management and to facilitate the development. It was proposed to remove 154 individual trees (52 of those to facilitate the development), 8 groups (3 of those to facilitate the development) and 2 areas of partial groups also to facilitate the development.

409. The Council's Tree Officer has raised an objection to the proposal due to unacceptable arboricultural impact through the loss of mature high value trees. Initially concerns were raised with the removal of the following trees:

- T32 Sweet Chestnut (Grade A) – The tree is close to the existing entrance and its removal appears only to facilitate the parking for plots around block F. The location of stem is outside of the parking bays and its retention should be feasible.
- T50 Sequoia sempervirens (Grade A) – The tree is located south of the existing main drive and its removal appears to be only to facilitate the new access road. As with T32, the location of the stem appears to be outside the location of the proposed road and its retention could be feasible.
- T338 Sequoia sempervirens (Grade A) – The tree is located close to the boundary with the Caenwood Close. The stem and crown of the tree are located outside the footprint of the proposed development. Retention should be feasible.
- G347 Primarily Birch (Grade B) – The group is a dense mixture of primarily semi mature to mature Birch. Removal of this large section will have a detrimental impact on the local arboricultural amenity and outlook from the properties of Caenwood Close. This will have a detrimental impact on the landscape for some of the only adjacent neighbouring properties. The trees also contribute towards the green corridor between station approach and the college.
- G192 Sycamore, Oak, Sweet Chestnut (Grade A) – North eastern section – A group of early to mature trees have been proposed for removal to accommodate parking and a bin store. This will removal a valuable section of important woodland edging for relatively minor structures.
- T1 Sweet Chestnut (Grade A), G192 Sycamore, Oak, Sweet Chestnut (Grade A), T193 Oak (Grade A), G23 Sycamore, Mixed (Grade A) - All of the above have been proposed for removal to accommodate the extension to the Hawker building and bin store. The trees are all mature and of a very high value. The building currents has a good relationship with the surrounding treescape. The additional extension would result in unacceptable tree removal.

410. Following the Tree Officer's comments, T32 Sweet Chestnut (Grade A), T50 Sequoia sempervirens (Grade A) and T338 Sequoia sempervirens (Grade A) are now proposed to be retained. The eight veteran, two notable and single ancient Oak trees would be retained and buffered from the development.

411. Concerns are raised regarding demolition of structures inside retained trees Root Protection Areas (RPA) and in some cases close to the stems. Two particular areas identified are around trees T131 – T135 and T39, T36. Brick structures are proposed for removal and the areas returned to soft landscaping,

but the Tree Officer has concerns that these structures are not identified on the arboricultural impact assessment or tree protection plans. The structures are sunken into the ground which will foreseeably cause problems with the trees root system and amended ground levels when removed. The height differences in the existing ground would also provide a challenge during the regrading of the soil. The lack of attention to detail could result in unacceptable damage to valuable trees identified for removal.

412. The default specification of scaffold framework tree protection fencing throughout the site could be secured by condition. Exceptions would be agreeable on hard landscaping and where a two staged scheme is necessary for the installation of no dig porous surfacing.

413. Concerns are also raised that new hard surfacing has been proposed in arboriculturally sensitive areas. Officers follow the recommendations in BS5837 2012 to limit the amount of new hard surfacing in retained trees RPA to 20% of less. Section 5.18 – 8.28 of the Arboricultural Report outlines this principle has been achieved and where necessary existing hard surfacing removed and returned to soft landscaping to aid as mitigation. Further details would need to be supplied on the specifications and feasibility by condition.

414. The removal of existing hard landscaping in existing RPA's is supported and any expansion of soft landscaping around valuable retained trees and their root systems. One particular area of benefit is around trees T245-T249.

415. Services are referred to in the arboricultural report but only as a generic statement. No details have been provided about the potential locations and impact to retained trees and their root systems. Considering the extensive constraints created by trees on the site, officers would need indicative locations of new services in relation to the trees constraints to fully assess the impact and feasibility.

416. Pruning has been identified in some areas on the tree removal plans to accommodate building proposals. On closer inspection most of the proposed pruning is not necessary because the canopies are only over amenity space or sufficient clearance is already present. Where possible the pruning of retained trees should be avoided or limited to an absolute minimum to minimise the impact on the health and form of retained trees.

417. The application has been provided with an extensive landscaping scheme which includes the provision for 474 new trees to be planted as part of the proposal. There is a good mixture of sizes and species proposed to help provide a resilient treescape against future threats such as climate change and pests & diseases. The plans also indicate the willingness to provide soil root cells underneath areas of hard landscaping to help sustain new trees into maturity. This can be secured by an appropriately worded condition.

418. In conclusion the proposal would result in the loss of important trees on the site and there is a lack of detail in the supporting arboricultural information demonstrating how important retained trees on the site will be afforded adequate

level of protection. Conditions are proposed to seek additional arboricultural information in relation to the retention of important trees. However, on balance, the proposal is considered to conflict with Policy DM6 of the Development Management Plan.

The impact on ecology and biodiversity

419. The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations) transposed into UK law, the European Union Directive 92/43/EEC. The Habitats Regulations include a strict system of protection for European Protected Species (EPS) which includes bats. Amongst other things, they place a duty on decision-makers to have regard to the requirements of the Habitats Directive in the exercise of their functions. Also of relevance is the Wildlife and Countryside Act 1981 and the NPPF.

420. NPPF at para 174d) seeks to encourage opportunities to incorporate biodiversity improvements in and around developments, especially where this can secure measurable net gains for biodiversity.

421. Para 180 of the NPPF sets out that when determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

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

422. Policy CS15 seeks to protect and enhance priority habitats and species and ensures that new development does not result in a net loss of biodiversity and where feasible contributes to a net gain through the incorporation of biodiversity features.

423. Policy DM21 seeks all new development to preserve, manage and where possible enhance existing habitats, protected species and biodiversity features. Support will be given to proposals that enhance existing and incorporate new biodiversity features, habitats and links to habitat networks into the design of buildings themselves as well as in appropriate design and landscape schemes of new developments with the aim of attracting wildlife and promoting biodiversity.

424. Section 99 of ODPM Circular 06/2005 states: “It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and / or planning obligations before permission is granted”. Consequently, it advises that surveys should only be required by a condition on a planning permission in exceptional circumstances. This is reinforced in advice within the Planning Practice Guidance.

425. The application is supported by the following documents:

- Ecological Baseline (Aspect Ecology, March 2023)
- Ecology Figures F1 To F4 (Aspect Ecology, January 2023)
- Environmental Statement, Chapter F (Aspect Ecology, April 2023)
- Biodiversity Net Gain Assessment (Aspect Ecology, April 2023)
- Tree Survey, Arboricultural Impact Assessment & Preliminary Method Statement (RPS, October 2023).
- Planning Statement (Lichfields, May 2023)
- Lighting Assessment (Strenger, May 2023)
- Technical Note 07 Response to Consultee Comments (Aspect Ecology, 11 August 2023)
- Technical Note 08 Response to Consultee Comments (Aspect Ecology, 13 October 2023)
- Brooklands College (Consideration of Supporting Information in Relation to Bats) (HDA, 10th November 2023)
- Brooklands College, Weybridge: Updated Bat Surveys (EcoSupport, 12 October 2023)
- Framework Bat Mitigation / Compensation Strategy and Summary of Updated Preliminary Roost Assessment, (EcoSupport, 20 November 2023)
- Technical Note 10 Response to Consultee Comments (Aspect Ecology, 20 November 2023)

426. Surrey Wildlife Trust (SWT) and Surrey Bat Group (SBG) have reviewed the proposal and accompanying documentation and raised a number of concerns and

requested further clarifications as discussed in detail below. The applicant provided three ecology responses (Technical Notes 07, 08 and 10) to address the concerns raised by SWT and SBG as well as letters from other ecologists (HDA and EcoSupport).

Ecology

427. In terms of statutory designations, the application site is located within the 400m – 5km buffer zone from the Thames Basin Heaths Special Protection Area (SPA). South West London Waterbodies SPA and Ramsar lies approximately 5km to the north west of the application site. These designated areas are of international importance. Chertsey Meads Local Nature Reserve (LNR) and Dumsey Meadows Site of Special Scientific Interest (SSSI), which are of national importance, lie approximately 1.9km and 2.8km to the north of the site respectively. Non-statutory designated Site of Nature Conservation Importance (SNCI), known as The Heath, is located adjacent to the eastern boundary of the site. River Wey SNCI lies approximately 0.2km to the east of the application site.

428. The site is located within the SSSI Impact Risk Zone (IRZ), which applies to any residential development with a net gain in units.

429. The site contains a large extent of woodland, where a mix of native and non-native tree species are present, with many trees noted to be mature or overmature and of substantial size. The woodland understorey was surveyed to be generally sparse, with saplings and young trees largely scarce and many non-native species present, with Rhododendron ponticum being particularly prominent. The herb layer is equally sparse with a very few ancient woodland indicator species present. Eight veteran Oak trees were recorded within the woodland, with a further two Notable and a single Ancient Oak also present.

430. The woodland within the site is also defined as Priority Habitat shown in the figure below.

431. The table below details the faunal species recorded on the site.

Faunal species	Description
Bats – roosting (trees)	23 trees with potential to support roosting bats have been recorded within the site (excluding the woodland): the majority affording low potential, with six affording moderate potential to support roosting bats.
Bats – roosting (buildings)	Three buildings have been recorded within the Site to support bat roosts, including a Brown Long-eared Bat maternity roost and nonbreeding day roosts for Common Pipistrelle and Soprano Pipistrelle.
Bats (foraging and commuting)	The majority of bat activity was recorded along the woodland edge, with at least five species (or species

	groups) recorded during the surveys. Soprano Pipistrelle Pipistrellus pygmaeus was most frequently recorded, with Common Pipistrelle Pipistrellus and Nyctalus/Eptesicus sp. recorded frequently. Myotis sp. and Nathusis' Pipistrelle Pipistrellus nathusii were also recorded to lesser extent.
Badger	No Badger setts were recorded within or immediately adjacent to the proposed development. The site provides suitable sett creation, foraging and commuting opportunities.
Other Mammals	The site comprises habitats common in the local area, and as such is anticipated to be utilised by common and widespread small mammal species. The Site offers some potential opportunities for Hedgehog. No evidence of the presence of Dormouse was recorded during the specific survey work undertaken.
Birds	The habitats present provide a range of foraging opportunities and nesting areas for birds. The site supports a breeding bird assemblage that is entirely typical of the woodland habitat that dominates the Site. Survey work recorded a small number of species listed as Amber/Red on the list of Birds of Conservational Concern (BOCC) and/or under S41 of the NERC Act. No significant numbers of notable species were recorded.
Reptiles	A low population of Slow Worm has been recorded at the site.

The impact on designated sites and trees

432. The proposal would require the removal of parts of the woodland. This includes a small strip within the southern parcel and the woodland attached to the eastern boundary with neighbouring properties in Caenwood Close which is identified as Priority Habitat. The ecological baseline report it states that the woodland habitat is a poor example of a Priority Habitat. Following concerns from SWT, further clarification was provided that it is actually mixed woodland due to its significant coniferous component and therefore a non-Priority Habitat.

433. The construction of the development has the potential to detrimentally impact the adjacent SNCI, The Heath, the hydrologically linked River Wey SNCI and a number of faunal species within the site through potential pollution and dust generation, physical damage and soil compaction, disturbance and damage to potential roost sites, disturbance from lighting and noise, vegetation clearing works and destruction of active nest, spread of invasive species and from protected species falling into trenches/excavations. To mitigate against these potential detrimental effects, a Construction Environmental Management Plan (CEMP) could be secured by appropriately worded condition. This would include but would not be limited to the details of pollution safeguards, protective fencing,

soft strip demolition within appropriate seasons, sensitive lighting strategy, good working practices, ecological supervision where necessary and clearance of vegetation outside of the nesting bird seasons where practicable as well as clearance of invasives and disposal of contaminated material in appropriate manor.

434. The CEMP would also protect the Chertsey Meadows LNR, Dumsey Meadows SSSI and Thames Basin Heaths SPA during the construction of the development, although it should be noted that these are located some distance away with no direct connection through ecological pathways.

435. During the operational phase of the development, without mitigation it is likely to result in increased recreation pressure on Thames Basin Heaths SPA, Chertsey Meadows LNR and Dumsey Meadows SSSI and The Heath SNCI.

436. The Council's Thames Basin Heaths SPA strategy requires mitigation through a combination of Community Infrastructure Levy (CIL)/ Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM). This is discussed in more detail in the next section of the report.

437. A SANG is proposed within the woodland in the south-western corner of the site to mitigate against the impact on other designated areas as it would absorb recreational impacts at source by providing alternative open space for residents in proximity to the proposed development.

438. The woodland accommodating the SANG would see an increase in recreational pressure. To mitigate against the impact, an ecologically sensitive woodland management plan is proposed targeted at the removal of invasive species (which significantly encroach across most of the woodland at present) as well as the enhancement through new native planting and strategically managing access along the new ~2.3km circular walk which forms part of the new SANG.

439. SWT asked for further justification with respect how the proposed SANG would mitigate against the impact on the adjacent SNCI (The Heath) as some houses would be much closer and would have direct links to the adjacent SNCI (The Heath). The applicant responded stating that there are formal pathways within The Heath SNCI adjacent to the site and that any minor increased use of existing formal footpaths/public rights of way is unlikely to impact the qualifying features of the SNCI. The other parts of The Heath SNCI are separated from the application site by roads and railway, do not have formal public rights of way and are located further away from the development than the proposed SANG. SWT noted an objection from Natural England (NE) and advised that NE need to be satisfied with the proposed SANG for it to be considered adequate mitigation measure.

440. The eight veteran, two notable and single ancient Oak trees would be retained and buffered from the development.

441. The proposed drainage strategy discussed in detail further in the report would ensure all runoff from the site receives an appropriate level of treatment to achieve sufficient level of quality in accordance with the SuDS Manual.

Bats

442. Buildings within the application site were subject to an internal and external inspection in June 2022. Building B16 (Locke-King link) and B17 (Brooklands Mansion) were assessed to have high suitability for roosting bats. Buildings B16a (Locke-King), B13 (Edge) and B13a (Edge Outbuilding) were assessed to have moderate suitability, and buildings B1 (Vickers), B4 (Wellington), B7 (Tower), B9 (Berkley), B14 (Studio), B15 (Concorde), B18/B19 (Talbot) were assessed to have low suitability to support a bat roost.

443. Between the 20th September and 28th September 2023, Aspect Ecology carried out three bat presence/likely absence survey, during which active bat roosts have been recorded on the site. It is noted that these do not follow the Good Practice Guidelines (Collins, 2016) as they were carried out outside the optimal season of May to August. In addition, the Good Practice Guidelines (Collins, 2016) state "Multiple survey visits should be spread out to sample as much of the recommended survey period as possible; it is recommended that surveys are spaced at least two weeks apart, preferably more, unless there are specific ecological reasons for the surveys to be closer together".

444. Since active bat roosts have been recorded within the site that would be subject to loss or disturbance as a result of the development, a bat mitigation license will be required from Natural England. The applicant recognises this requirement in their submission.

445. Surrey Wildlife Trust (SWT) and Surrey Bat Group (SBG) have been consulted on the application. SWT and SBG raised several concerns with the submitted bat surveys and their deviation from Good Practice Guidelines (Collins, 2016) due to carrying out three surveys within eight days and the absence of any bat presence/likely absence survey data for between May and August. These are detailed below.

446. SBG have raised a number of concerns with the submitted documents advising that they were not suitable for determining the application based on:

- The survey being conducted at a sub-optimal time of year in September with very few days in between, which is a departure from best practice;
- Lack of justification for the loss of any bat roosts in terms of mitigation hierarchy and consideration of alternatives;
- Lack of detailed mitigation, compensation and enhancements for the bat roosts that will be lost or disturbed due to the proposal;
- Lack of details of a previous survey carried out on part of the site (by Greengage Ecology) to inform an earlier project;
- The lack of surveyor's details and quality control sign off;
- Only one photo provided for each building;
- No plan per each survey;
- Limited use of night vision aids;

- The plans within the ecology reports referring to buildings by number, whilst the plans for the application referring to buildings by name.

447. The applicant in their response (Technical Note 07; 11/08/23) provided details of the license holder, who directed the completed surveys, and the name of the ecologist who signed off the surveys. Updated figures were also provided cross-referencing the buildings' numbers and names and showing the position of each surveyor. The ecologist also confirmed that IR cameras set-ups comprising a 1080p IR sensitive camera and two IR illuminators (floodlights), were used where potential bat access points on buildings were shaded, and on access points where the species involved emerge late and call quietly i.e. the identified access to the Brown Longeared Bat maternity roost.

Building 16 (high suitability)

448. Through the internal inspection in June 2022 more than 10,000 brown long eared droppings were recorded in the loft void of Building B16. This appears to confirm the continued presence of a brown long eared maternity roost within Building B16 since 2015.

449. Between the 20th September and 28th September 2023, Aspect Ecology carried out three bat presence/likely absence surveys on Building B16, which recorded the emergence of brown long eared bats on each of the surveys. A common pipistrelle was also recorded. The survey programme carried out by Aspect Ecology does deviate from the Good Practice Guidelines (Collins, 2016) due to carrying out three surveys within eight days and the absence of any bat presence/likely absence survey data for between May and August does represent a limitation.

450. Aspect Ecology are satisfied with the level of information obtained to characterise the bat roost within Building B16. This appears to be principally based upon the internal bat inspection carried out in June 2022, which is within the peak maternity period for bats, and which correlated with the internal bat inspection carried out in October 2015 by Greengage. The Response Note dated 11th August 2023 by Aspect Ecology states "Accordingly, the 2022 survey work indeed correlates with the 2015 work while further resolution has also been provided. Accordingly, the sub-optimal timings of the dusk emergence/dawn re-entry survey work completed in 2022 has not proved to be a constraint in the classifying of the roost types present".

451. An update 'emergence' survey of the southern half of Building B16 on the 31st August 2023 was undertaken by EcoSupport Ltd which did not record any bat emergences. An updated internal inspection was carried out on the 6th October 2023, which recorded approximately 20 brown long eared bats within the loft space of B16. EcoSupport Ltd concludes the presence of a brown long-eared maternity roost, in line with the assessment by Greengage and Aspect Ecology.

452. In B16, as indicated by Plan 5565/ECO4 of the Ecological Baseline report, a brown long-eared maternity roost is present. However, SWT advised that they had not yet received sufficient justification, or ecological reasons, on the timing of

the surveys and why the northern part of B16 has not been surveyed through emergence or dawn bat surveys. This is also a consultation point made by the Surrey Bat Group. In review of the Greengage report, they also did not survey the northern part of B16 in 2015.

453. EcoSupport, on behalf of the applicant, carried out a further assessment of Building B16 on 17th November 2023, including an internal inspection of the northern part of the building. The northern aspect of Building B16 was assessed by Aspect Ecology as having high suitability, however EcoSupport has downgraded this to being of moderate suitability to support a bat roost. No evidence of bat occupation was noted during the inspection in the northern part of the building. However, the Good Practice Guidelines (Collins, 2016) make clear that a lack of evidence does not necessarily mean a lack of roosting bats.

454. EcoSupport state "…would therefore conclude Aspect Ecology's assessment was on the cautious side but fundamentally delivering the outcome that would be needed to determine presence/absence in terms of number of surveys". The northern aspect of Building B16 has not been subjected to bat presence/likely absence surveys by Greengage, Aspect Ecology or Eco Support. The northern aspect of Building B16 appears to be retained, however the lack of bat presence/likely absence surveys on this part of the building is still a concern to Surrey Wildlife Trust. The limitation is because in the absence of comprehensive surveys of Building B16 information on the behaviour and presence/absence of bats may have been missed. It can, however, be confirmed that a brown long-eared maternity roost and common pipistrelle day roost is present in Building B16, and the mitigation, compensation, and enhancement strategy (In outline) has been designed based on this 'worst case scenario'.

Building 17 (high suitability)

455. Aspect Ecology carried out three bat presence/likely absence survey of Building B17 between the 21st September 2022 and 29th September 2022. A soprano pipistrelle bat roost was recorded during these surveys. The completion of the three surveys in this period is a deviation from the Good Practice Guidelines (Collins, 2016) due to the spacing between surveys and the lack of any bat presence/likely absence surveys between May and August.

456. SWT advised that there is no evidence of bat presence/likely absence surveys being carried on this building prior to the September 2022 surveys and noted that Greengage did not survey this building in 2015. SWT reviewed the responses provided by Aspect Ecology, Eco Support and Hankinson Duckett Associates and advise that there is a lack of analysis and evaluation for Building B17, with the focus being on B16.

457. An update 'emergence' survey of B17 was carried out on the 31st August 2023 by EcoSupport Ltd which did not record any bat emergences. Taken together this means that one bat presence/likely absence survey has been undertaken between May and August, however, Good Practice Guidelines (Collins, 2016) recommend the completion of at least two between May and August to give confidence in a negative result for structures. Furthermore, the

Good Practice Guidelines (Collins, 2016) states “A survey on 31st August followed by a mid-September survey is unlikely to pick up a maternity colony. An ecologist should use their professional judgement to design the most appropriate survey regime”.

458. SWT advise that the presence of a bat roost has been recorded; however, it is feasible that a bat maternity roost has been missed due to the scheduling of the surveys.

459. EcoSupport who in review of the survey carried out on the 31st August 2023 for B16 state “Whilst no emergences were noted, that is not entirely surprising as maternity roosts have typically disbanded by this point”. Therefore, it is feasible that maternity roosts, if present, could have disbanded from B17 in 2022 and 2023 before the presence/likely absence surveys were carried out. SWT advise that the Applicant appears to have an extremely limited data set to conclude the presence/likely absence of a maternity roost in Building B17.

460. The presence/likely absence of a bat roost is a material consideration in the determination of a planning application. A maternity roost has a higher conservation significance than a day roost. Given that Aspect Ecology has assessed that B17 has high suitability to support roosting bats, it is feasible that a maternity roost is present, and this does not only include void dwelling species such as brown long eared bat, but also crevice dwelling species such as pipistrelles, which may be roosting in locations which cannot be accessed safely during an internal inspection. SWT note that a soprano pipistrelle roost has been recorded, and assessed to be a day roost, which shows that at least one crevice dwelling species roosts in the building.

461. In the absence of a survey programme within the core maternity survey season, in line with Good Practice Guidelines (Collins, 2016), SWT advised that the Council should note the extremely limited data set on the presence/likely absence of a maternity roost in B17. The implications of B17 supporting a maternity roost of multiple or a single species of bat could be significant for the project as there would then be an impact to multiple high conservation significance bat roosts. SWT also advised that prior to determination, the Council reviews whether there is sufficient information to determine the presence/likely absence of a maternity roost in B17.

462. Hankinson Duckett Associates, on behalf of the applicant, in their ‘peer review’ state that “Whilst Surrey Bat Group are correct in stating that the approach to bat survey work undertaken does not fully reflect the BCT guidelines (noting of course that these are guidelines)...”. While it is agreed that the Good Practice Guidelines (Collins, 2016) are guidelines, this statement does not provide the Hankinson Duckett Associates assessment on the extent of the deviation from the guidelines or how this demonstrates a minimum confidence level to the LPA on the presence/likely absence of a maternity roost.

463. Hankinson Duckett Associates state “…I consider that the local planning authority can reasonably conclude that the favourable conservation status of the local bat population can be maintained by the proposed scheme” Surrey Wildlife

Trust argue that if there is not a robust evidence base to conclude the presence/likely absence of a bat maternity roost from B17, which appears to be the case, then this statement is unclear.

464. While the applicant has provided a number of technical notes and peer reviews to try to address the objections of Surrey Bat Group and Surrey Wildlife Trust, the consultees consider that the Applicant has not submitted sufficient information, in line with the Good Practice Guidelines (Collins, 2016), on the presence/likely absence of a bat maternity roost in this building. The building has been assessed as supporting a day roost, and Aspect Ecology and EcoSupport has assessed that this is sufficient information to allow the determination of the planning application.

465. The bat presence/absence survey programme carried out by Aspect Ecology and EcoSupport has significant deviation from the Good Practice Guidelines (Collins, 2016).

466. In the absence of a survey programme within the core maternity survey season, in line with Good Practice Guidelines (Collins, 2016), officers note the extremely limited data set on the presence/likely absence of a maternity roost in B17. The implications of B17 supporting a maternity roost of multiple or a single species of bat could be significant for the project as there would then be an impact to multiple high conservation significance bat roosts.

467. EcoSupport provide the results of an internal inspection in a loft space of B17, which found no evidence of bat occupation. The Good Practice Guidelines (Collins, 2016) make clear that a lack of evidence does not necessarily mean a lack of roosting bats. In addition, EcoSupport do not evaluate the limitation that B17 supports a range of potential roosting features on the external façade of the building which would not be reachable through an internal inspection of the loft space. Although the internal inspection provides useful information for the loft space of the building, it could not be relied upon as being a comprehensive internal inspection.

468. Eco Support state that “As there was no internal evidence of bats within this building, it would not automatically follow that surveys should be specifically targeted during the maternity period”. Surrey Wildlife Trust have advised that they are not aware of this methodology, and would defer to the Good Practice Guidelines (Collins, 2016) which states “Where a Potential Roost Feature (PRF) has been verified as moderate or high suitability for bats or evidence of bats is found, further surveys are likely to be necessary if impacts on the PRF or bats using it are predicted” and that for a high roost suitability building at least two surveys should be undertaken between May and August.

469. In Section 5.2, Aspect Ecology state “…. (roost characterisation) survey work may be required. It is understood that SBG and SWT hold a concern that, it has not been fully ruled out that, as yet, undetected other bat roosts could be present within B17, as survey work has not captured the early season window”.

470. To conclude Surrey Wildlife Trust believe that insufficient information on the presence/likely absence of a maternity roost has been submitted for B17. Their concern is that “survey work” has not “captured” the early season window or the maternity season window.

471. Aspect Ecology state that the possibility of undetected roosts is unlikely due to the survey work undertaken. In apparent support of this evaluation, EcoSupport has reviewed the transect data and static monitoring data recorded near B17 in 2022, which recorded low activity levels. Surrey Wildlife Trust consider that Aspect Ecology has an extremely limited evidence base to form this conclusion and that many species of bat do not echolocate when emerging or returning to roost from/to a building, therefore the low activity is unlikely to provide an accurate reflection or incidental view on the potential roosting behaviour of bats.

472. EcoSupport clearly state that the survey on the 31st August 2023 may not have recorded emerging bats from B16 because the maternity roost had disbanded, this same rationale can be applied to B17, which negates the value placed on the survey carried out on the 31st August for Building B17 in detecting potential a maternity roost.

473. In the Bats and Consideration of the LPA’s Duty by Aspect Ecology references the three steps within the Good Practice Guidelines (Collins, 2016) to include preliminary roost assessment, presence/likely absence survey and roost characterisation survey. In Section 5.2.2 it states “Nonetheless, as part of the further Stage 3 surveys of the structures to be undertaken to inform licencing, checks would be carried out to ensure that no other bat roosts are present”.

474. In Section 5.2.3, Aspect Ecology outline Paragraph 9.2.4 of British Standards 42020:2013 which provides the scenario of surveys being conditioned to inform licencing. This states:

> “The presence or absence of protected species, and the extent to which they could be affected by the proposed development, should be established before planning permission is granted; otherwise, all material considerations might not have been considered in making the decision. The use of planning conditions to secure ecological surveys after planning permission has been granted should therefore only be applied in exceptional circumstances, such as the following.
>
> a) Where original survey work will need to be repeated because the survey data might be out of date before commencement of development.
> b) To inform the detailed ecological requirements for later phases of developments that might occur over a long period and/or multiple phases.
> c) Where adequate information is already available and further surveys would not make any material difference to the information provided to the decision-maker to determine the planning permission, but where further survey is required to satisfy other consent regimes, e.g., an EPS licence.

d) To confirm the continued absence of a protected species or to establish the status of a mobile protected species that might have moved, increased, or decreased within the site.
e) To provide detailed baseline survey information to inform detailed post-development monitoring".

475. Aspect Ecology and EcoSupport clearly assess that in their professional opinion, it would be suitable to secure further bat presence/likely absence/roost characterisation surveys through a planning condition. Aspect Ecology appear to link this to "Where adequate information is already available and further surveys would not make any material difference to the information provided to the decision-maker to determine the planning permission, but where further survey is required to satisfy other consent regimes, e.g., an EPS licence".

476. Surrey Wildlife Trust advise that for Building B17 they have not been provided with a clear pathway for how it would be suitable to secure roost characterisation surveys as part of a planning condition. The discovery of a maternity bat roost would provide the decision maker with information which is a material consideration in the determination of a planning application. Given the substantial evidence of a brown long-eared maternity roost within B16, Surrey Wildlife Trust have concluded that the use of a condition for B16 would appear to be more relevant.

477. In line with the ODPM Circular 06/2005; it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted.

478. While the objections of Surrey Bat Group and Surrey Wildlife Trust are noted, officers consider that there are exceptional circumstances in this case to allow the details to be secured by condition.

Moderate suitability buildings

479. The Ecological Baseline report (Aspect Ecology, March 2023) provides no bat presence/likely absence survey results for Building B16a, B13 and B13a. However, buildings would be retained, and no works are planned to any of the roofs on these buildings. SWT advise that it is unclear whether it has been assessed if the proposed works could disturb a bat roost if one was present in the roofs of the buildings. SWT also advice the Council to consider whether more analysis is required on scoping out the requirement for bat surveys of these buildings.

Low suitability buildings

480. A single bat presence/likely absence survey was carried out on Buildings B1, B4, B7, B9, B15 and B19 in September 2022. Aspect Ecology found no evidence of roosting bats during the completion of the surveys on these buildings.

481. Two bat presence/likely absence surveys were carried on Building B18, however, with only two days spacing between surveys. B18 is assessed by Aspect Ecology to support a pipistrelle species roost. An update 'emergence' survey of B18 on the 31st August 2023 by EcoSupport Ltd did not record any bat emergences.

482. The Good Practice Guidelines (Collins, 2016) details that for sites assessed as having low suitability a survey should be carried out between May and August to give confidence in a negative result. For B1, B4, B7, B9, B15 and B19, a negative result was recorded in September, therefore SWT advise that this represents a further deviation from the Good Practice Guidelines (Collins, 2016). Eco Support Ltd did not carry out an update survey for these buildings in 2023, and Greengage did not survey these buildings in 2015. Through the September 2022 surveys, there is a baseline of presence/likely absence survey data from within the active bat survey season, however, SWT advise that the aforementioned limitations should be noted.

Bats and trees

483. Out of trees immediately within/adjacent to the site the 23 trees identified as supporting bat roosting potential, 17 were found to afford low potential, whilst six afford moderate potential. As per SWT's request, the applicant has confirmed that all trees identified to be of moderate and high potential to support roosting bats would be retained as part of the proposed development, whilst the majority of trees with low suitability would also be retained.

Bat mitigation, compensation and enhancement

484. The Environment Statement states that:

> "The Proposed Development will result in the loss of a non-breeding day roost for low number of Pipistrelle sp. and a non-breeding day roost for Soprano Pipistrelle located within existing buildings B16 and B18 (as per Figure F4, Appendix F2 to this ES). The Proposed Development will also result in the modification of a Brown Long-eared Bat Maternity Roost and Common Pipistrelle non-breeding day roost associated with building B17 (as per Figure F4, Appendix F2 to this ES)".

485. Section 2.15 of the Response Note TN07 states that the mitigation for the modification of the brown long-eared maternity roost will be provided in the form of a bat loft, indicative dimensions: 4m x 2m, with an apex height of 2m. Additional compensation will be provided in the form of bat boxes erected onto suitable trees within the retained woodland. Section 2.15 of TN07 states that the precise location of the new bat loft will be determined once relevant building design details have been approved.

486. Section 2.8 of the Response Note TN08 further states that the bat roost is located in a very large loft space, which will be retained "for the most part" under the scheme. The retained portion of the loft will be enhanced. Aspect Ecology state that "Nonetheless, an option is put forward to provide a new loft space as part of the proposals should this be felt desirable by Natural England to compensate for the loss of part of the existing void to the proposals".

487. EcoSupport Ltd in their Update Bat Surveys Technical Note "For this scheme, a significant part of B16 (which contains droppings) will be demolished although the clocktower and accessible loft space to the west will be retained. As such, the strategy here will likely look at partitioning off the area being lost and then the remaining loft space enhanced with additional features in the retained loft space such as squeeze boxes and a reduction in external lighting around the roost entrance…". They continue that "Full details of this can be provided within a stand-alone bat mitigation strategy and this can be secured via a suitably worded condition of planning and agreed prior to the commencement of works to the buildings".

488. An outline "rough view" of how much loft space of B16 should be kept and enhanced is provided by EcoSupport in Update Bat Surveys Technical Note.

489. Hankinson Duckett Associates in their peer review state that "together with the opportunities provided by the proposed development to retain existing roof voids and/or create new voids I consider that the local planning authority can reasonably conclude that the favourable conservation status of the local bat population can be maintained by the proposed scheme".

490. SWT acknowledge that it is often feasible for detailed mitigation and enhancement strategies to be secured through a planning condition. However, brown long-eared bat is a Species of Principal Importance. Therefore, the Council has a biodiversity duty to determine planning applications with this species as a material consideration.

491. SWT conclude that currently the approach for mitigation and compensation outlined by Aspect Ecology, Eco Support Ltd and endorsed by HDA is limited in demonstrating to the Council that the application has the feasibility and design to maintain the favourable conservation status of this brown long eared maternity roost, which has District importance.

492. Aspect Ecology cite in the Ecological Baseline report that the provision as part of the retained loft void will be 4m x 2m, with an apex height of 2m, although it is not clear what exactly is being proposed. However, the current loft void is 7m wide, 100m long and 5m high. The proposed indicative provision is a significant reduction in width, length, and height. The rationale and evidence base behind proposed mitigation and compensation has not been provided.

493. SWT advise that the Council reviews whether the Applicant is required to provide further demonstration that the mitigation and compensation provided for the brown long-eared maternity roost in B16 is sufficient.

494. However, SWT also advise that if the Council conclude that the current outline strategy and securing detailed design through a bat mitigation strategy is acceptable, then this information should be submitted prior to commencement. SWT also advise that the Council may also wish to secure the condition recommended by Hankinson Duckett Associates in their peer review.

495. The Circular requires that when effects on European Protected Species (EPS) are being considered, decision-makers should have regard to the 3 tests that are used when licences are being determined. These tests are whether the development is necessary for preserving public health or public safety or other imperative reasons of overriding public interest; there is no satisfactory alternative; and, the action will not be detrimental to maintaining the population of the species concerned at a favourable conservation status in its natural range.

496. SWT and SBG are of the opinion that the submitted bat surveys are not suitable for determining the application as they do not follow the Good Practice Guidelines (Collins, 2016) due to carrying out three surveys within eight days and the absence of any bat presence/likely absence survey data for between May and August. This is particularly relevant to Buildings 16 and 17, which were assessed to have high suitability for roosting bats.

497. The applicant's main surveys and responses to SBG and SWT have been prepared by Aspect Ecology. Two additional letters have been also provided from other ecologists (Hankinson Duckett Associates and Ecosupport Ltd). The applicant's ecologist agree that the surveys don't follow the Good Practice Guidelines (Collins, 2016) noting that it is only guidance and not rules, which allows for some degree of interpretation and deviation subject to a robust justification being provided (which they consider to be the case here). Their main case is based on the fact that any additional surveys of Building 16 would not materially change the mitigation/compensation proposals and that more concrete details of a bat loft can be secured by a planning condition.

498. An updated Framework Bat Mitigation/Compensation Strategy and Summary of Updated Preliminary Roost Assessment has been provided by EcoSupport, dated November 2023. This provides a greater level of information on the mitigation, compensation and enhancements that can be provided for bats. In conclusion, officers consider that the application site has sufficient capacity to support the favourable conservation status of bats. However, based on the information submitted to date the actual ecological value of the application site for bats is not fully understood. While the objections of Surrey Wildlife Trust and Surrey Bat Group are noted, it is considered that the applicant has demonstrated exceptional circumstances in this case and it is proposed to secure updated and further bat surveys and a final mitigation strategy by condition. As part of this, the Applicant will be required to submit updated or further bat presence/likely absence/roost characterisation surveys for all buildings on-site that will be impacted to inform a detailed impact assessment mitigation, enhancement, and compensation strategy. Therefore, subject to a safeguarding condition, the proposal would comply with Policy CS15 of the Core Strategy and Policy DM21 of the Development Management Plan.

Reptiles

499. In line with the SWT's request, the applicant has clarified that the results and assessment within Greengage Ecology's 2016 reptile survey report were not considered within the recent Environment Statement as they were superseded by the 2022 work. SWT have advised that a reptile mitigation and habitat enhancement strategy should be secured through a prior to commencement condition, within a Landscape and Ecological Management Plan.

Hazel dormhouse

500. SWT advise that, whilst the surveys identified the likely absence of hazel dormhouse from the site, suitable habitat for these species existing within the site. Should these species be identified during works, all works should cease immediately and advice should be sought from Natural England or a qualified specialist. There is a requirement to apply for a mitigation license from Natural England, where development may cause offence to these protected species. This can be communicated to the applicant by way of an informative.

Great Crested Newts

501. As shown in the figure below, the development falls within the amber impact risk zone for great crested newts. There are also two ponds within 500m of the development proposal, situated 240m and 460m south-west of the site boundary.

502. There is indirect connectivity between the development and surrounding features in the landscape. Natural England Standing Advice guidance for local planning authorities advises that surveys on ponds up to 500m from development sites should be requested.

503. NatureSpace Partnership, who are part of the District Licensing Scheme, have been consulted on the application. They have reviewed the proposal and accompanying information and advised that the applicant has not surveyed the two ponds within 500m of the site, so the status of these ponds is currently unknown. Should great crested newts be present in these nearby ponds they may well use the site during their terrestrial dispersal phase as the woodland on site would provide suitable foraging habitat. There is also a ditch on site within the woodland, if it holds water at times, it could also support great crested newts in surrounding habitat. Therefore, NatureSpace Partnership recommend that robust reasonable avoidance measures are secured by a pre-commencement condition. Subject to this condition, the development would not result in harm to the great crested newts.

504. SWT advise that, whilst the surveys identified the likely absence of great crested newts from the site, suitable habitat for these species existing within the site. Should these species be identified during works, all works should cease immediately and advice should be sought from Natural England or a qualified specialist. There is a requirement to apply for a mitigation license from Natural England, where development may cause offence to these protected species. This can be communicated to the applicant by way of an informative.

505. The development also proposes replacement bat roosting opportunities, sensitive lighting strategy, hedgehog cut-out within new fences and new features for foraging and sheltering reptiles.

Biodiversity enhancement

506. Whilst the requirement to demonstrate at least 10% biodiversity net gain under the Environment Act 2021 is expected to come into effect for applications submitted from January 2024 onwards, the applicant has submitted a Biodiversity Net Gain (BNG) Assessment with this proposal.

507. In addition to the measured mentioned earlier in the report, other biodiversity enhancement measures include:

- The implementation of a conservation management plan to reverse the decline and restore the woodland on site. The management plan will remove the heavily invaded non-native species and re-plant with native species as part of the SANG management plan;
- The provision of bat boxes to provide additional roosing opportunities throughout the site;
- The provision of bird boxes to provide new nesting opportunities for breeding birds and may attract additional species to breed;
- The inclusion of specialist insect boxes to provide breeding and wintering opportunities to solitary insects;
- New wildflower grassland and scrub to provide increased pollen and nectar sources for foraging invertebrates;
- The inclusion of brush and log piles within the site and woodland to provide opportunities for beetles and other species;
- The implementation of Cala's Urban Wildlife Strategy for all residential homes. This incorporates the biodiversity improvement measures listed above into every new home created as part of the development e.g. integrated bat boxes, bird brick, invertebrate brick (bee brick), hedgehog holes and native trees.

508. The BNG Assessment concludes that the above ecological enhancements would lead to 14.20% net gain in habitat units for biodiversity and a 568.76% net gain in hedgerow units. SWT have requested that, prior to determination, the biodiversity net gain assessment is updated to reflect the presence of Priority Habitat, or greater evaluation and justification is provided for entering the apparent non-Priority Habitat type into the metric. SWT have also requested that

further information is provided on additionality has been considered as part of the biodiversity net gain assessment including the proposed SANG.

509. The sensitive lighting strategy gives consideration to the following factors:

- Light barriers - new planting (e.g. hedgerows and trees) or fences, walls and buildings can be strategically positioned to reduce light spill;
- Spacing and height of lighting units - increasing spacing between lighting units will minimise the area illuminated and allow bats to fly in the dark refuges between lights.
- Reducing the height of lighting will also help decrease the volume of illuminated space and give bats a chance to fly over lighting units (providing the light does not spill above the vertical plane). Low level lighting options are considered for any parking areas and pedestrian routes, e.g. bollard lighting, handrail lighting or LED footpath lighting;
- Light intensity - light intensity (i.e. lux levels) to be kept as low as possible to reduce the overall amount and spread of illumination; and
- Directionality - to avoid light spill lighting to be directed only to where it is needed e.g. avoid illumination of the woodland edge. Particular attention to be paid to avoid the upward spread of light so as to minimise trespass and sky glow.

510. Further details of a sensitive lighting scheme can be conditioned via an appropriately worded condition.

511. It is noted that the level of biodiversity net gain being achieved on the site as part of the development is something which weighs in favour of the proposal and which will form part of the balancing exercise undertaken at the end of this report. The proposal therefore complies with Policy CS15 of the Core Strategy and DM21 of the Development Management Plan in relation to biodiversity.

The impact on Thames Basin Heaths Special Protection Area

512. The Thames Basin Heaths are an internationally designated Special Protection Area (SPA) which is a network of heathland sites that covers 8,274 hectares of Berkshire, Hampshire and Surrey and is fragmented by urban development and other land uses. It is the view of Natural England (NE) that the cumulative effect of further residential development up to 5km from these protected heathlands would have a significant adverse effect on the heaths, and in particular on three rare species of birds, the Nightjar, Dartford Warbler and Woodlark. These birds' nest on or near the ground and, as a result, are very susceptible to predation by cats, rats and crows, and to disturbance from informal recreational use, especially walking and dog walking.

513. The legal requirements are set out in the European Habitats Directive (92/43/EEC) and Birds Directive (2009/167/EC), which are transposed into domestic law by the Conservation of Habitats and Species Regulations 2017 (as amended). Avoidance and/or mitigation measures are therefore required to avoid any harm.

514. The application site is located within the 400m – 5km buffer zone from the Thames Basin Heaths Special Protection Area. Any development resulting in a net increase of residential units in this buffer zone must satisfy the Habitats Regulations and must therefore comply with the Council's avoidance strategy as outlined in Policy CS13 of the Core Strategy 2011 and in the Developer Contributions SPD 2021. The application proposes a net increase of 320 residential units and, as such, has the potential, in combination with other development, to have a significant adverse impact on the protected sites.

515. Policy CS13 of the Core Strategy 2011 and Development Contributions SPD 2021 provide the Council's framework by which applicants can provide or contribute to the delivery, maintenance and management of Suitable Alternative Natural Green Space (SANG) within the borough and to Strategic Access Management and Monitoring (SAMM) which can mitigate the impact of development.

516. The revocation of the Regional Strategy for the South East of England was modified to retain Policy NRM6 on 25.03.2013 to mitigate the environmental effects.

517. SANG falls within the definition of infrastructure and therefore contributions are collected through CIL. SAMM contribution is secured by a completed legal agreement is therefore required prior to determination of an application.

518. As part of the application process, the Council has undertaken an Appropriate Assessment (AA), which concluded that the development would not affect the integrity of the European site either alone or in combination with other plans and projects in relation to additional impact pathways subject to the application meeting the mitigation measures set out by Policy CS13 of the Core Strategy 2011 and in the Council's Development Contributions SPD 2021 and secured by a legal agreement. The AA has been sent to NE for review, who have concurred with its conclusions and raised no objection to the development based on the TBH SPA mitigation being secured through CIL and SAMM contributions.

519. The legal agreement is currently being prepared to secure the necessary SAMM contributions. Subject to these contributions being secured through a legal agreement in addition to CIL payment, the impact on the TBH SPA would be appropriately mitigated.

520. It should be noted that the proposed SANG is not intended as mitigation for the impacts of the development. It is proposed as an additional benefit of the scheme.

Suitable Alternative Natural Greenspace (SANG)

521. 'Suitable Accessible Natural Greenspace' (SANG) is the name given to green space that is of a quality and type suitable to be used as mitigation within the Thames Basin Heaths Planning Zone.

522. Its role is to provide alternative green space to divert visitors from visiting the Thames Basin Heaths Special Protection Area (SPA). SANGs are intended to provide mitigation for the potential impact of residential development on the SPA by preventing an increase in visitor pressure on the SPA. The effectiveness of SANGs as mitigation will depend upon the location and design. These must be such that the SANG is more attractive than the SPA to users of the kind that currently visit the SPA.

523. The proposed development includes the creation of a SANG on the site as an additional benefit and not to mitigate the impact of the proposed development. The features below have been found to draw visitors to the SPAs, which should be replicated in a SANG, as set out in the guidelines prepared by Natural England, who are the statutory consultee and would have to be satisfied that change of use of the woodland would be able to function as a SANG.

524. Following an objection from Natural England (NE), the SANG has been reduced from 12ha to 9.95ha. Policy NRM 6 and Policy CS13 of the Core Strategy sets out that TBH SPA mitigation measures must be agreed with Natural England. NE have raised no objection to propose development as it does not rely on the proposed SANG for TBH SPA mitigation. However, they would object to any future planning applications seeking to use the Brooklands College SANG as Thames Basin Heaths mitigation.

525. They consider that there is currently insufficient information to enable certainty that the SANG coming forward with this application will be effective in ensuring no adverse effects on integrity arising from recreational impacts to Thames Basin Heaths SPA from residential development. To enable the SANG to be relied upon Natural England require the following further information to be contained with a full SANG Management Plan:

- Details of the capital works required to establish the SANG
- Information on the proposed long term management, costs and funding of the SANG in perpetuity (who will management ultimately default to)
- A Management Company must be elected and agreed in writing for the management of the SANG in perpetuity. If this is not the Local Planning Authority then step-in-rights also need to be agreed in writing with the Local Planning Authority.
- Confirmation of the SANG layout, including provision of a car park within the SANG area if any development beyond 400m is to be allocated to the site. The eastern woodland parcel has been removed from the SANG Area and therefore the proposed location of the car park is now outside the SANG area. It should be within the SANG so people are able to take their dogs safely off-lead from the car park to the SANG.
- Clarification on details within the SANG Management Plan.

526. The applicant argues that these concerns can be addressed through the Section 106 legal agreement. However, at this stage officers can only give limited weight to the potential benefit of the proposed SANG. The area of woodland would be opened to the public and there would be woodland management as part of the proposal. This would bring public benefits even if Natural England do not

agree following the legal agreement that it would meet the criteria for consideration as a SANG.

Impact on flood risk and SuDS

527. Paragraph 159 of the NPPF 2023 sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. It then continues at para 167 that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.

528. Para 169 sets out that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

a) take account of advice from the lead local flood authority;

b) have appropriate proposed minimum operational standards;

c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and

d) where possible, provide multifunctional benefits.

529. Policy CS26 (Flood Risk) and the Flood Risk SPD 2016 echo these requirements.

530. The site has an area of 27.03ha of which approximately 4.491ha is impermeable. The proposed development would result in increase in impermeable area.

531. The river Wey flows within 300m of the site's southwest and northwest boundaries. There is an ordinary watercourse crossing the woodland in the south-western corner of the site. The watercourse emerges from a Thames Water culvert beneath the railway to the south of the site. The watercourse connects into the River Wey via a series of drainage ditches between fields to the west.

532. The site is located within Flood Risk Zone 1, which has less than 1 in 1,000 annual probability of river or sea flooding. Most the site is at a low risk of surface water flooding with small pockets of medium and high areas of surface water flooding where buildings impede overland flow routes and in the area of the ordinary watercourse. The site is not in a region prone to groundwater flooding, which was also confirmed by the ground investigation undertaken by Soiltechnics. The site's geology (Bagshot Formation – Sand) has a good infiltration rate. However due to the presence of two landfill areas, the site has a variable infiltration rate and infiltration cannot be used in some parts of the site.

533. The application is supported by:

- Drainage & SuDS Strategy, Curtins, 27 April 2023, revision P01, document reference: 081271-CUR-00-XX-RP-C-92030 – Brooklands College;
- Flood Risk Assessment, Curtins, 27 April 2023, revision P01, document reference: 081271-CUR-00-XX-RP-C-92031
- Environmental Statement Chapter J – Flood Risk and Drainage, April 2023
- Curtins Surface Water Drainage Response 22/08/2023, reference: 081271-CUR-XX-XX-TC-00001
- 081271-CUR-XX-XX-D-C-92002 - P05 - Proposed Below Ground Drainage Sheet 1 of 10
- 081271-CUR-XX-XX-D-C-92003 - P05 - Proposed Below Ground Drainage Sheet 2 of 10
- 081271-CUR-XX-XX-D-C-92004 - P05 - Proposed Below Ground Drainage Sheet 3 of 10
- 081271-CUR-XX-XX-D-C-92005 - P05 - Proposed Below Ground Drainage Sheet 4 of 10
- 081271-CUR-XX-XX-D-C-92006 - P05 - Proposed Below Ground Drainage Sheet 5 of 10
- 081271-CUR-XX-XX-D-C-92007 - P05 - Proposed Below Ground Drainage Sheet 6 of 10
- 081271-CUR-XX-XX-D-C-92008 - P05 - Proposed Below Ground Drainage Sheet 7 of 10
- 081271-CUR-XX-XX-D-C-92009 - P05 - Proposed Below Ground Drainage Sheet 8 of 10
- 081271-CUR-XX-XX-D-C-92010 - P05 - Proposed Below Ground Drainage Sheet 9 of 10
- 081271-CUR-XX-XX-D-C-92011 - P05 - Proposed Below Ground Drainage Sheet 10 of 10
- 081271-CUR-XX-XX-D-C-92014 – P01 – Existing Hydrological Catchment Plan
- 081271-CUR-XX-XX-D-C-92015 – P01 – Post Construction Discharged to Watercourse Plan
- 081271-CUR-XX-XX-D-C-92016 – P01 – Location Plan

534. The submitted drainage strategy identifies the following drainage areas.

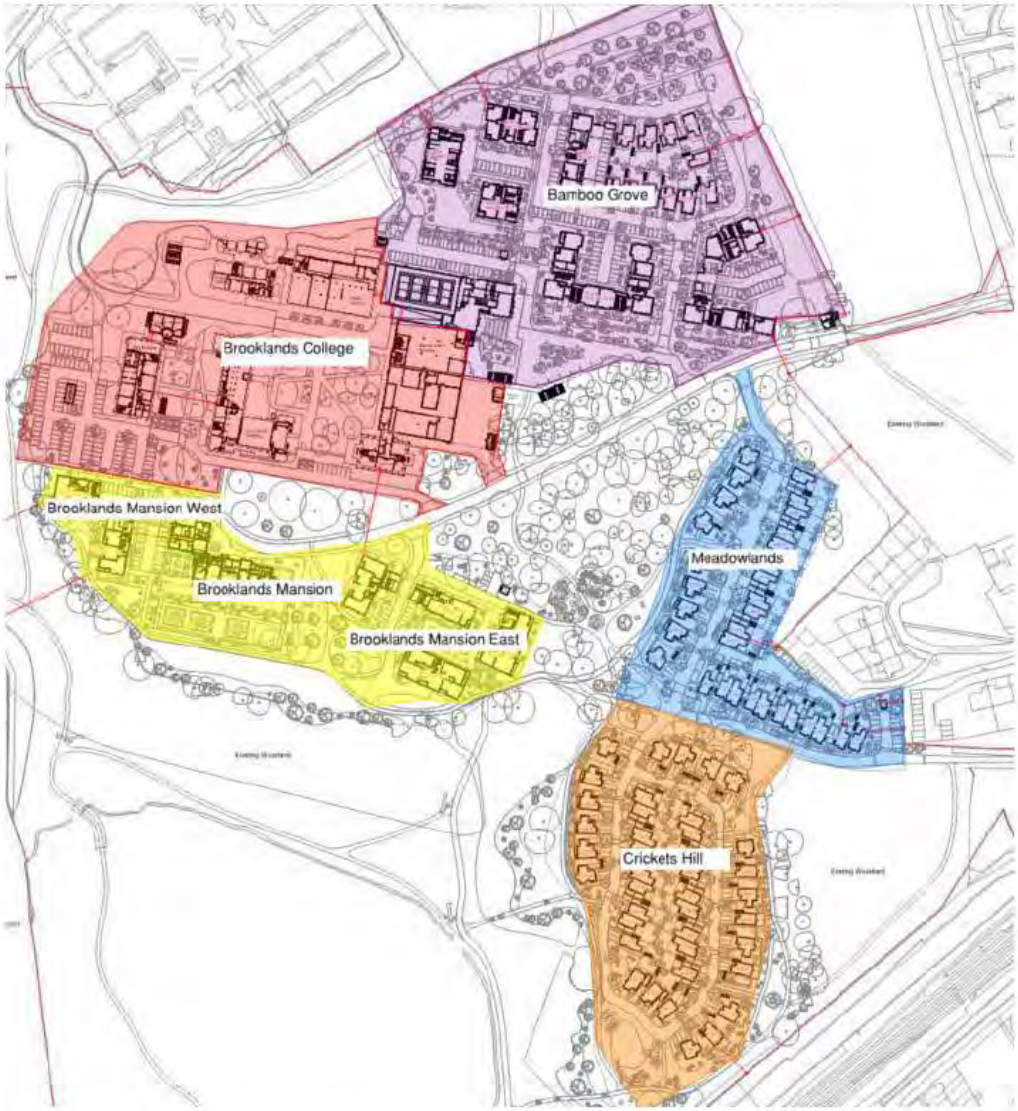


Figure 5-1 Drainage Character Areas

535. Each area would benefit from its own drainage strategy given the varying site conditions. Brooklands Mansion West is proposed to discharge via infiltration using a combination of cellular crate soakaways and permeable parking. Meadowlands is proposed to discharge via infiltration using a cellular crate soakaways. Where possible swales and bio-retention areas have been included as above ground SuDS features.

536. Bamboo Grove and Crickets Hill are situated on areas contaminated by landfill, eliminating infiltration as a possible discharge method. This was confirmed by the Soiltechnics Report. The report also highlighted Brooklands Mansion East was in an area unsuitable for infiltration following the soakage test results. These areas are therefore proposed therefore drain to the ordinary watercourse that runs through the sites southwest corner.

537. Water butts or similar storage structures are also proposed for the individual dwellings to store rainwater. Attenuation storage would be provided by cellular storage crates. Permeable pavement is also proposed throughout the

development. This would provide some additional storage and would be used to ensure quality of discharged water is adequate. In areas with landfill contamination, it is proposed to discharge to the network and eventually the watercourse. The Submitted Drainage Strategy set out that these measure would ensure the development does not increase flood risk downstream, particularly in relation to Lockstone Close.

538. Due to the site access and the number of existing trees to be retained discharge the Thames Water sewer on Heath Road is not deemed feasible.

539. Complex flow controls would be used to limit discharge rates in the 1 in 1 year, 1 in 30 year and 1 in 100 year +45% climate change events to their respective greenfield rates. Due to the site topography and to preserve trees, pumping would be used to convey water from the catchments to the watercourse.

540. For the college expansion parts of the development, the existing network of drains and ring soakaways would be used wherever possible. Where existing drainage cannot be used, new soakaways would be employed in line with current guidance.

541. The levels of the site would be designed with consideration of exceedance flooding events. Exceedance flow paths would be directed away from buildings and toward the watercourse. Finished Floor Levels would be above surrounding landscaping and all properties are proposed to have safe escape routes.

542. Due to the large number of existing trees being retained, the tree root protection zones may lead to need for directional drilling for both the surface and foul water.

543. Foul sewage from the residential areas is proposed to drain to a central pumping station which would connect to the Thames Water manhole onsite via a rising main. The final connection into the Thames Water sewer would be made by gravity with the rising main concluding in a manhole upstream of the connection.

544. Surrey County Council (SCC) in their role as a Lead Local Flood Authority (LLFA) have reviewed the proposal and submitted documents. Initially they raised an objection to the development as they were not satisfied with the proposed drainage scheme and asked the applicant to address the following:

- The development offers the opportunity to utilise a range of sustainable surface water management techniques. Justification should be provided as to why SuDS features such as green/blue roofs, permeable paving, downpipe planters, attenuating tree pits, raingardens etc have not been utilised across a wider area;
- The plans should clearly indicate the location of swales and filter strips proposed in Bamboo Grove and Meadow Lands;
- There should be consideration of the inclusion of raingardens or SuDS planters in the spatially constrained areas of the site;
- A pumped surface water outfall to the existing watercourse is proposed from Crickets Hill, Brooklands Mansion East and Bamboo Grove, however, no information has been provided in relation to the existing

watercourse. The onward connectivity of the existing watercourse should be clearly evidenced, either through photographs confirming its onward connectivity or through survey information.

- The pumped surface water outfalls from Bamboo Grove, Crickets Hill and Brooklands Mansion East would result in surface water out falling into a different catchment than existing, although discharge rates are proposed to be limited to greenfield no information has been supplied which confirms the impact discharging surface water to a different catchment may have. As such there is no evidence to confirm surface water flood risk off site will not increase as a result of the proposals.
- Evidence should be supplied which confirms the greenfield runoff rates for the positively drained areas of the site so a comparison can be made with the proposed discharge rates (although like for like is proposed no evidence of the existing rates has been supplied).
- A table summarising the outfall locations, proposed discharge rate(s) and attenuation measures should be provided as an overall summary for the entire site, which would enable the agreed principles to be clearly followed through to the detailed design stage.

545. The applicant has issued a response to SCC's objections dated 22/08/2023 and additional drawings. SCC have reviewed the submitted information and raised no objection to the development subject to conditions requiring the submission of further design details of the proposed surface water drainage scheme and a verification report.

546. Thames Water have also responded to the consultation advising that the existing foul water network infrastructure is unable to accommodate the needs of the development proposal. They have therefore recommended a condition to secure upgrades to the foul water network system for it to be able to accommodate the needs of the development.

547. Thames Water raise no objection in terms of surface water drainage on the basis that it would not be discharged to the public network. They have also recommended an informative in relation to groundwater risk management permits.

548. Network Rail (NR) and their drainage team have also reviewed the proposal and accompanying information. They note that the area of the site known as Crickets Hill would partially drain towards Network Rail land which coincides with an area of poor condition earthwork assets and no existing track drainage systems. NR also advised that if the levels design of the properties and exceedance routes are not appropriately considered in this location then development in this area could increase risk of failure of our earthwork asset and increased flooding of NR Land. NR do not raise an objection to the development subject to a pre-commencement condition requiring the submission of full details of the drainage strategy, flood routing and levels design for the Crickets Hill area to ensure that no water would be diverted towards Network Rail Infrastructure.

549. Subject to the above conditions, the development would be safe for its lifetime and would not increase the risk of flooding on the site or elsewhere. Therefore the proposal would comply with Policy CS26 of the Core Strategy.

Pollution

550. Paragraph 185 of the NPPF states that decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development including mitigating and reducing to a minimum potential adverse impacts resulting from noise from new development and avoiding noise giving rise to significant adverse impacts on health and the quality of life, and limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

551. In paragraph 174, the NPPF 2023 requires planning decisions to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.

Land contamination

552. Paragraphs 183-4 of the NPPF 2023 state that decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from contamination including proposals for mitigation including land remediation and for adequate site investigation information, prepared by a competent person, is available to inform these assessments. After remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. In addition, it confirms that where a site is affected by contamination, the responsibility for securing a safe development rest with the developer and/or landowner.

553. Policy DM5 (Pollution) states that development affecting contaminated land will be permitted provided that the site is remediated to ensure it is suitable for the proposed use, taking into account the sensitivity of future occupants/users to pollutants, and that remedial decontamination measures are sufficient to prevent harm to living conditions, biodiversity or the buildings themselves. All works, including investigation of the nature of any contamination, should be undertaken without escape of contaminants that could cause risk to health or the environment.

554. The application is supported by the following documents:

- Brooklands College Environmental Statement (ES) & associated appendices, April 2023, Litchfields, 63471/01/NG 26566126v1;
- ES Appendix K1 parts A & B Historical Ground Investigation Reports: Rust Environmental, December 1995; Soiltechnics Phase 1, October 2007; Soiltechnics Phase 2, October 2007; and Soiltechnics, Interim Gas Monitoring, February 2008;
- ES Appendix K2 Ground Investigation Report, Soiltechnics Ltd, July 2022, ref R-STU5668-R01 Rev D;

- ES Appendix K3 Remediation Strategy, Soiltechnics Ltd, April 2023, ref STU5668_R02 Rev D;
- ES Appendix K5 Ground Gas Design Report, Soiltechnics, April 2023, ref STU5668-R01-Rev_A;
- Remediation Strategy ref: STU5668-R02 Rev E (Soiltechnics, August 2023)

555. There are two historical landfills recorded onsite. The first one is Cricket's Hill in the south-eastern corner of the site, where the southern residential parcel is proposed. The second one is located in the area of the existing car park, where the northern residential parcel is proposed. Cricket's Hill was estimated to contain 90,000 sqm of waste, and the northern car park area is estimated to contain 35,000 sqm of waste. The historical ground investigation determined no evidence of liner at base of the landfill and detailed that both landfills were completed on the dilute and attenuation principle.

556. An area of potentially infilled land is also recorded within the former brickyard area in the northeastern area of the site.

557. In terms of geology, Lynch Hill Gravel Member (Sand and Gravel) is found within the eastern area only and no superficial deposits across the western area of the Site. However, it is anticipated that the Lynch Hill Gravel material may have been removed or quarried before landfilling of Cricket's Hill. Bagshot Formation (Sand) bedrock is present across the whole site, anticipated to be underlying Made Ground across the western area and below Lynch Hill Gravel within the eastern area.

558. The submitted information confirms that there is a very low risk to no hazard from the following ground stability hazards on and around the Site: collapsible, running sands, ground dissolution, landslide, shrinking or swelling clay, and compressible deposits. The site is not within an area affected by coal and non-coal mining.

559. A Secondary A Aquifer underlies the site within the bedrock of the Bagshot Formation and within the Lynch Hill Gravel Member (superficial deposits). Secondary A Aquifers consist of permeable layers capable of supporting water supplies at a local rather than strategic scale. In some cases, forming an important source of base flow to rivers. The site is not located within a Groundwater Source Protection Zone (SPZ).

560. The Radon Atlas for England and Wales and the Groundsure report confirm that the site is in a lower probability radon area where less than 1% of the properties are above the action level. Consequently, no radon protection measures are necessary to construct new dwellings.

561. Chapter K Ground Conditions and Contamination provides the details of historical ground investigation, environmental testing of soils and groundwater, potential effects of the development, necessary mitigation measures and an outline Construction Environmental Management Plan (CEMP).

562. The report sets out that without mitigation there are risks of minor adverse, moderate adverse and major/substantial adverse effects during the construction and operation of the proposed development including. It also recommends various mitigation and monitoring measures, which would reduce the effects to negligible. These include:

- dust and silt (mitigated through Construction Design and Management Regulations 2015);
- excavation works undertaken in areas where potentially perched groundwater is identified (mitigated through Construction Design and Management Regulations 2015);
- landfill soils leaching out and runoff and migration through the sub-surface depending on the piling technique (mitigated through a Piling Risk Assessment and adopting an appropriate piling technique to minimise migration);
- potential contaminant linkage between contaminants in the landfill material and shallow soils and future site users (mitigated through 600mm clean capping layer to be detailed within a Remediation Strategy);
- potential contaminant linkage between ground gas generating soils and future site users if gas can flow or permeate through building envelopes and accumulate within enclosed spaces in new buildings (mitigated through gas protection measures in line with BS8485+A1 to be detailed within a Remediation Strategy);
- potential contaminant linkage between water supply pipes (and the water within) and potential contaminants in the landfill material, particularly heavy metals and PAHs (mitigated consulting the local water supply company regarding the pipe material and backfill specification of potable water supply pipes);
- the effect on ecological receptors (new landscaping) during the operational phase of the development (mitigated through Construction Design and Management Regulations 2015);
- potential linkage between potentially aggressive contaminants in the made ground and natural soils to below-ground concrete used within the new development (mitigated through the design of the concrete used within the development per the site's concrete classification assessed using BRE Special Digest 1).

563. The Council's Contaminated Land Officer has reviewed the proposal and accompanying information. Initially they requested amendments to increase the thickness of the top/subsoil cover to ≥ 600mm for front gardens and soft landscaping areas and ensuring the geotextile is of a highly visible, bright colour so that occupiers/residents see and recognise that it marks the bottom of the clean cover layer and that breaching it could result in exposure to soil contamination. These have been done by the applicant in the updated Remediation Strategy.

564. The EHO has also advised that a Materials Management Plan CL:AIRE Definition of Waste: Development Industry Code of Practice (DoWCoP) is not currently available. When available, this shall be submitted to the Council together

with the Remediation Strategy and Verification Plan in accordance with the recommended condition.

565. The Ground Gas Design Report submitted provides general recommendations and is not a detailed site-specific design. The Remediation Strategy states that details of the landfill gas protection system will be provided within a separate Gas Design Report. The report must include design specifics to achieve the required level of protection (in line with BS8485:2015+A1:2019), details of the installer and independent installation verification. When available, this must be submitted to the Council in accordance with the recommended below.

566. Part d) Piling of the recommended condition requires a full piling risk assessment and method statement completed according to the methodology and framework set out in the Environment Agency's guidance on piling on contaminated land Environment Agency, "Piling and Penetrative Ground Improvement Method on Land Affected by Contamination: Guidance on Pollution Prevention. National Groundwater and Contaminated Land Centre Report NC/99/73," 2001, including consideration of contaminants, groundwater and aquifers and methods to minimise risk of contamination.

567. Environment Agency (EA) have also reviewed the proposal and accompanying information (including additional submitted documents) and advised that the previous use of the application site as a landfill presents a medium risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a secondary aquifer A.

568. EA raise no objection to the development subject to conditions requiring the submission of further details of a remediation strategy, verification report, previously unidentified contamination, infiltration, piling and borehole decommissioning. EA also advise that without these conditions, they would object to the development because it cannot be guaranteed that the development would not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

569. Subject to the conditions recommended by the EHO and EA, the site would be adequately remediated to ensure it is suitable for the proposed residential use and harm would be prevented from potential risks and effects to living conditions, biodiversity and building themselves.

Air quality

570. Policy DM5 (Pollution) sets out that planning permission will not be granted for proposals where there is significant adverse impact upon the status of the Air Quality Management Area (AQMA) or where air quality may have a harmful effect on the health of future occupiers of the development, taking into account their sensitivity to pollutants, unless the harm can be suitably mitigated.

571. The site is not within an AQMA with the nearest one being the Weybridge AQMA, which lies approximately 0.7km to the north of the site. The proposal

comprises a major application that would deliver college improvements and 320 residential units.

572. Chapter H of the ES addresses Air Quality and includes the following appendices:

- Appendix H1: Traffic Data & Modelled Roads
- Appendix H2: Background Concentrations & Modelled Receptors
- Appendix H3: Model Verification
- Appendix H4: Consultation
- Appendix H5: Windrose
- Appendix H6: Impact Assessment Results

573. The assessments take into account both the impact of dust from the construction and the impact of traffic once the development is completed and operational. The assessment uses guidance from EPUK (Environmental Protection UK) and IAQM (Institute of Air Quality Management) to assess the likely impact and mitigation. Various receptor points around the site were used and the assessment concludes that the impact from traffic is negligible on the operational aspect of the application. The consultants have used pollution data modelling and taken into account information on existing air quality within the study area which has been collated from the following sources:

- The results of monitoring and the LAQM review and assessment reports undertaken by Elmbridge Borough Council (Elmbridge Borough Council, 2020);
- Background pollutant concentration maps published by Surrey County Council.

574. The assessment shows that predictive pollution levels for nitrogen dioxide, PM10s and PM2.5s at the receptor locations would be below the national objective levels set for these pollutants and no mitigation measures are therefore considered necessary. The impact on air quality on local residents from construction is also considered negligible.

575. The Council's EHO (Noise & Pollution) has reviewed the submitted assessment and confirmed that they agree with its findings and conclusions. A condition is recommended in relation to the provision of EV chargers.

576. A Construction and Environmental Management Plan (CEMP) and travel plans to promote sustainable modes of transport would also be secured by conditions.

577. Subject to the above conditions, the proposal would not result in significant adverse impact on air quality.

Noise and vibration

578. Policy DM5 (Pollution) states that all development that may result in noise or odour emissions or light pollution will be expected to incorporate appropriate attenuation measures to mitigate the effect on existing and future residents. New development located near to existing noise, odour or light generating uses will be expected to demonstrate that the proposal is compatible and will not result in

unacceptable living standards, for example through the mitigation measures, the design of the building and its orientation and layout. It is not considered that the proposal would result in unacceptable odour emissions.

579. Chapter I of the EN covers noise and vibration and includes the following appendices:

- Appendix I1: Baseline Survey
- Appendix I2: Construction Noise
- Appendix I3: Consultation with the EHO
- Appendix I4: Traffic Noise Assessment

580. The reports consider the impact of noise from construction and the existing ambient noise levels in the vicinity of the proposed development. The assessment also considers vibrational effects on new residential properties from the railway located approximately 50m to the south-east of the new residential development.

581. The report concludes that the College itself (SR A) and existing properties at Caenswood Close (SR B) would be affected by the demolition and construction period. However, this can be managed through a specific Construction Environmental Management Plan (CEMP) to minimise the noise and vibration effects on these areas, which can be secured by a condition.

582. With regards to noise during the operation phase of the development, it is noted that there is an existing woodland screening the site from the neighbouring properties in Caenwood Close. A part of this woodland would be removed to make way for new houses H 12-22 H. Whilst the proposed development would result in a change in noise levels when compared to the existing arrangement on the site, the proposed houses within the Central and Southern sections would be of suburban nature and the resultant noise levels would be consistent with those typical in suburban areas. As such, the impact would not be harmful enough to warrant refusal on these grounds.

583. It is noted that existing woodland that currently screens the site from the neighbouring properties in Caenwood Close would be removed to make way for new houses H 12-22 H. Whilst this would open up the site and the new properties would be visible from the neighbouring properties in Caenwood Close, the new houses would be located well in excess of 22m from the neighbouring buildings in Caenwood Close. This would ensure that the development does not result in loss of light, overbearing impact or loss of privacy to the occupants of the residential properties in Caenwood Close. It should be noted that loss of a view is not a material planning consideration.

584. In terms of the insulation of the new properties, the report concludes that provided the performance requirements based on Table 18.1 are met, then the internal noise levels within the properties should comply with BS8233:2014. As some of the properties are close to the railway the applicant has opted for mechanical ventilation to achieve this. A 55m long and 3m tall acoustic fence is also proposed to be erected along the southern site boundary to mitigate exceedance of internal noise criteria in the southernmost future residential

properties. Further details of this acoustic fence can be secured by an appropriately worded condition.

585. Due to the proximity to the railway, 17 proposed housing units shown in Figure 18.2 would be impacted by vibration exceeding the recommended vibrational levels. The report does state that with adequate mitigation this can be overcome. Paragraph 18.11 of the report gives examples of the type of mitigation (structural isolation bearings, subterranean trench barrier or improvement of track conditions), but this would be decided at a later date in the process. A Vibration Impact Assessment can be secured by an appropriately worded condition.

586. The outdoor amenity of the proposed units is unlikely to be affected by noise from the railway as the noise assessment shows that noise levels are no greater than 55dBA.

587. The Council's EHO (Noise & Pollution) raised no objection to the development subject to conditions securing the compliance with the details set out in the submitted noise report as well as the submission of post-completion testing, additional noise impact assessment for plant and machinery and vibration impact assessment.

588. Subject to the above conditions, risks of noise and vibration nuisance would be minimised.

Light pollution

589. Appendix D4 of the ES includes a Lighting Assessment, which provides details of the existing lighting on site and a concept strategy of the proposed lighting in the streets, car parks and open spaces within the site. This strategy would then be used to guide more detailed lighting proposals secured by a planning condition and set to suitable light level standards.

590. The strategy also sets out lit footpaths connecting to the Heathside School and Weybridge Train Station as these are identified as key routes, with more visually sensitive areas along the western and southern boundary to have lower lighting.

591. The Lighting Assessment has been reviewed by the Council's EHO (Noise & Pollution), who offers the following comments. The lighting assessment plan shows that modelling was conducted based on the Institute of Lighting guidance on obtrusive lighting. The Lighting Assessment sets out that the site falls within a suburban area. However, taking into account the local lighting characteristics, the assessment considers that the Institute of Lighting Professionals (ILP) Environmental Zone (EZ) E2 (Rural) would be the most appropriate classification for the purposes of the assessment. In line with EZ 2, the guidance states that pre curfew (before 11pm) the lighting intrusion into windows should be below 5 Ev (lux) and below 1 post curfew. At each of the residential receptors (including the neighbouring properties Caenwood Close) the lux level using the types of lighting shown in section 5, the lighting is adequate. Section 7.1 and 7.2 describe mitigation that will be taken to reduce any impact further. Section 8.1 and 8.3

gives results of the lighting and these show that the obtrusiveness and glare would be negligible.

592. Section 7.1 sets out that the following mitigation measures are integral to good lighting design, and have therefore been included in the Assessed Scheme of Lighting as a matter of course:

- the use of luminaires with zero direct contribution to upward light;
- careful aiming and positioning of luminaires;
- careful selection of luminaires;
- the use of optimal light distributions for their specific location and orientation; optimisation of mounting heights; the use of dimming (via factory pre-set);
- the use of presence detection controls and zoned switching;
- a 365-day timer clock and photocell controls; the adoption of the lowest intensity LED modules practicable; and
- minimising the task illuminance level.

593. Section 7.2 sets out that the following mitigation measures have been adopted in the design and planned operation of the Proposed Development, specifically with a view to limit light spill affecting potential light-sensitive ecological receptors:

- using the lowest colour temperature light sources practicable (3000K i.e. 'warm-white') to the site generally;
- using narrowband long wavelength light sources adjacent to potential light-sensitive ecological receptors where colour rendition is of lower importance; using orange (red, green, amber) light sources adjacent to potential light-sensitive ecological receptors where colour rendition is of greater importance;
- the use of an increased number of luminaires having lower lumen outputs and lower mounting heights; and
- by risk-assessed design & operation (by others), lighting specific areas of the site below workplace illuminance criteria due to environmental constraints.

594. With regards to light pollution during the operation phase of the development, it is noted that there is an existing woodland screening the site from the neighbouring properties in Caenwood Close. A part of this woodland would be removed to make way for new houses H 12-22 H, which would open up the site and make the proposed development more visible. Whilst the proposed development would result in a change in light levels when compared to the existing arrangement on the site, the proposed houses within the Central and Southern sections would be of suburban nature and the resultant light levels would be consistent with those typical in suburban areas.

595. The EHO has recommended that the lighting details should be installed, retained and maintained thereafter for the lifetime of the development in accordance with the submitted details. Since the submitted Lighting Assessment is intended to be used to guide more detailed lighting proposals, a condition securing further lighting details would be applied. Subject to this condition, the risks of light pollution would be minimised.

Waste management

596. The NPPF advises that it should be read in conjunction with the National Planning Policy for Waste (NPPW). The NPPW 2014 explains at paragraph 8 that in determining planning applications for non-waste development local planning authorities should ensure that new development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development. This includes providing adequate storage facilities (e.g. ensuring that there is sufficient and discrete provision for bins) to facilitate a high quality, comprehensive and frequent collection service; and the handling of waste arising from the construction in a way that maximises reuse/recovery opportunities and minimises off-site disposal.

597. Policy 4 (Sustainable Construction and Waste Management in New Development) of the Surrey Waste Local Plan 2019 (SWLP) seeks to ensure that planning permission for any development is granted only where Construction, Demolition, and Excavation (CD&E) waste is limited to the minimum quantity necessary; opportunities for re-use and for the recycling of CD&E waste on site are maximised; on-site facilities to manage waste arising during the operation of the development are of an appropriate type and scale; and integrated storage to facilitate reuse and recycling of waste is incorporated in the development.

598. Policy CS27 (Sustainable Buildings) seeks to reduce the carbon footprint. In doing so, the Council will encourage high standards of sustainable developments, including the facilitation of waste recycling.

599. Policy DM8 (Refuse, recycling and external plant) states that “appropriate waste and recycling facilities must be provided on all new developments, including changes of use. Proposals will be acceptable provided that:

a. The location and design of bin storage, waste facilities and any proposed external plant, such as air conditioning units and extract flues, have been considered at the outset and are integral to the development,
b. The design and siting of bin storage and external plant respect the visual amenities of the host building and the area, and
c. Storage points for refuse and recycling are accessible for collection vehicles as well as regular users”.

600. The application is supported by Operational Waste Management Plan ref. 81307-CUR-00-XX-T-TP-00006-P03_OWMP Rev 04 prepared by Curtins dated September 2023, which details the facilities and arrangements relating to waste arising from the development once occupied and operational.

601. Surrey County Council as the Minerals and Waste Planning Authority (MWPA) have reviewed the proposal and accompanying information and advised that the application site is sufficiently distant from minerals or waste management designations, facilities, and infrastructure and so the potential for prejudice and the issue of safeguarding would not arise. However, the proposed development would generate CD&E waste, Local Authority Collected Waste (LACW) and/or Commercial and Industrial waste (C&I waste) once occupied and operational.

602. Paragraph 8.199 of the applicant's Planning Statement (dated May 2023) sets out that CD&E waste arising from the development would be reduced and managed in accordance with the waste hierarchy. In the submitted Energy Strategy and Sustainability Statement (dated 21 April 2023) the applicant commits to preparing a Site Waste Management Plan prior to the commencement of construction activities which will seek to promote effective management of CD&E waste and aims to divert at least 80% of waste from landfill. The applicant's Outline Construction Logistics Plan (Appendix G5 of the ES) discusses 'material procurement measures' at Section 5.3 and mentions measures for disposal/storage/re-use of CD&E waste and materials.

603. The MWPA welcomes the applicant's commitment to minimising material use, preventing waste, and maximising reuse and recycling/recovery of waste on and off site. They raise no objection to the development subject to:

- the Council being satisfied that the development includes adequate facilities for waste storage and recycling and that adequate controls existing to ensure that waste storage and recycling is maintained and managed for the lifetime of the development;
- a condition being imposed to secure the submission of a Site Waste Management Plan CD&E waste.

604. Joint Waste Solutions (JWS) are responsible for the residential collection of refuse and managing of recycling. A Developer's guide to bins and waste has been produced by the Council to help property developers meet recycling and waste requirements. The guidance provides advice on items such as waste storage container types and capacities, locations for storage, maximum dragging distances and vehicle access requirement, etc.

605. The Operational Waste Management Plan sets out how the proposed development would comply with the Council's guidance.

606. Waste collection associated with the proposed development would be accessed via the internal road network. All of the vehicle access routes would be 4m wide needed for refuse vehicles. The undercroft of Block H-J would also be tall enough for refuse vehicles to pass. Turning heads have been incorporated throughout the development proposals to support vehicles entering and exiting the site in forward gear.

607. Waste stores for individual houses would be provided within the curtilage of each property, in gardens or in some instances within the footprint of the house with access to the carriageway to facilitate waste collection.

608. Residents living within apartments would transport their waste to communal waste stores for collection. Residential carry distances would not exceed 30m and all refuse collection points would be located within 10m of the refuse vehicle stopping location.

609. During the application process, JWS raised concerns that the communal waste store for the shared ownership flats in Block F would exceed the 10m bin

drag distance. In response to this objection, the bins in the bin store have been amended from large communal bins to smaller individual bins so that each flat has 1 x general waste bin, 1 x recyclable waste bin and 1 x food waste bin (Drawing No. BA9691-2350 Rev B). It would then be written in the leases that on collection days, residents would then need to present the bins on the kerbside for collection. Based on this arrangement JWS have removed their objection. Full details of this arrangement will be secured by an appropriately worded condition. JWS did not raise other concerns.

610. Brooklands College including the proposed Sports Hall would operate in accordance with the existing waste strategy for the college. Refuse collection would be undertaken by a private waste contractor occurring twice weekly, with one general waste and one recycling collection per week.

611. Whilst currently the waste storage containers are located at a number of locations across the College campus, it is proposed to consolidate waste into three waste storage locations: external compound 1 (serving Tower and Barnes Wallis), external compound 2 (serving Locke King, Hawker, Edge, Vickers and Admin) and an external waste store adjacent to the new Sports Hall (serving the Proposed Sports Hall and Community Hub). The table below sets out the existing and proposed waste storage provision for the College.

	Existing storage	Proposed External Compound 1	Proposed External Compound 2	Sports Hall	Total Proposed
General waste	15 x 1100L	5 x 1100L	10 x 1100L	3 x 1100L	18 x 1100L
Recyclable waste	11 x 1100L	4 x 1100L	10 x 1100L	3 x 1100L	17 x 1100L
Food waste	4 x 120L	4 x 120L	0	0	4 x 120l

612. The proposed waste storage capacity is considered to be sufficient for the current waste generation of Brooklands College, with additional capacity to accommodate any future uplift in students and staff numbers taken into account within the college campus waste storage proposals. These details can be secured by an appropriately worded condition.

613. Subject to the above conditions, the proposed waste management details are considered acceptable in compliance with Policy DM8 of the Development Management Plan.

Utilities

614. The application is supported by Foul Water and Utilities Planning Statement ref. 32656-HML-RP-U-59000 prepared by Hilson Moran dated May 2023. This confirms that the applicant enquired about the water, sewerage, electricity and data services network supplies in the locality and consulted the respective providers prior to the submission of the application. Based on the responses

received, the assessment concludes that the supply connections would be feasible.

615. The incumbent network operator for potable water is Affinity Water Limited (AWL). A response from AWL has been supplied, who have confirmed that a new onsite water distribution network (1600 Meters of 180mm Barrier Pipe mains) can be connected into AWL's existing network immediately outside the site in Heath Road. AWL have also confirmed that there is suitable capacity in the local network to supply this development and no abnormal off-site or upstream network reinforcement is required. AWL have been consulted on the application; they have responded advising they have no comments to make.

616. The details of foul sewage and surface water drainage have been addressed in the 'Impact on flood risk and SuDS' part of the report. Thames Water have confirmed that the existing foul water network infrastructure is unable to accommodate the needs of the development proposal without the necessary upgrades to the foul water network system, which would be secured by an appropriately worded condition.

617. The incumbent licensed network operator is Southern Gas Networks (SGN). It is not proposed to extend gas mains and services into the development as heat and hot water would be provided from lower carbon electrically led systems in support of a fossil-fuel free development, which would include electrical heat pumps.

618. The host distribution network operator for electricity is UK Power Networks (UKPN). An application to UKPN was issued by the applicant based on a maximum electrical demand to support all new-build residential dwellings each fitted with a heat pump, electrical heating and hot water to the Mansion House plus the sports hall/community hub building and pumping station. This maximum demand also includes significant electric vehicle charging infrastructure. The UKPN's response details that the proposed point of connection would be Weybridge Primary Substation and sets out a cost estimate noting that additional costs may be required for off-site reinforcement based on the results of a network study, which would be carried out during preparation of the formal quotation.

619. The regulated open-access network operator is Openreach (a BT Company). Openreach can provide a full fibre to the home (FTTH) service at this location and would provide any off-site or remote network upgrades.

Fire safety

620. The application is supported by a Fire Statement rev.2.1 (May 2023), which sets out the relevant fire safety considerations for the development.

621. Under planning gateway one, a relevant building is defined as:

- contains two or more dwellings or educational accommodation; and
- meets the height condition of 18m or more in height, or 7 or more storeys.

622. “Dwellings” include flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (as per article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order).

623. The Health and Safety Executive (HSE) have been consulted on the above application, who have confirmed that the proposed development does not fall under the remit of planning gateway one because the height condition of a relevant building is not met.

Renewable energy and energy conservation

624. Chapter 14 of the NPPF sets out the strategy for meeting the challenge of climate change, flooding and coastal change. Paragraph 157 asserts that in determining planning applications, local planning authorities should expect new development to:

a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

625. Policy DM2 requires all new development to “achieve high quality design, which demonstrates environmental awareness and contributes to climate change mitigation and adaptation…Proposals should take account of landform, layout, building orientation, massing, and landscape to minimise energy and water consumption.”

626. The application is supported by the following documents:

- Chapter N Climate Change and Resilience;
- Energy Strategy and Sustainability Statement.

627. In addition to the measures discussed above (e.g. SuDS strategy, promotion of active travel, etc.), the proposed development would incorporate the following:

- Comply with new Building Regulations Part L 2021 and achieve improvements over notional building.
- Take a ‘Fabric First’ approach by incorporating high standard of energy efficiency measures and fabric parameters to reduce energy demands.
- Implement an all-electric-led scheme and supply energy efficiently in line with the energy hierarchy.
- Introduce low carbon and renewable energy technologies on-site.
- Consider design measures to support migration and adaptation to anticipate the effects of climate change, as per the Climate Change ES chapter.
- The design intent is to ensure as many of the materials as possible are sustainably responsibly and local sourced and do not have a high embodied energy.

- Materials will be selected where possible from the BRE Green Guide to minimise the embodied energy.
- Wherever possible and appropriate recycled materials will be incorporated into the design.
- Selecting materials with long life span and that require little maintenance
- Using timber that is FSC certified
- The specification of low water consuming fittings will be fitted within the dwellings with information explaining the benefits of reducing the water use available.
- Pulsed water meters to allow users to actively monitor consumption
- Water (rain) harvesting, where possible, and/or for irrigation purposes, such as rainwater butts on individual properties.

628. Throughout the construction process the applicant states that the main contractor/s will be required to:

- Monitor the environmental impacts of their activities by setting targets and recording energy and water consumption throughout construction
- Operate an ISO14001 compliant Environmental Management System
- Ensure that all temporary site timber used during construction complies with the UK Government Timber Procurement Policy by ensuring that 100% of temporary site timber is FSC or PEFC certified
- The main contractor/s will also be encouraged to monitor the carbon dioxide emissions arising from the transport of construction materials waste materials to and from the site

629. Overall, it is considered that the proposal would result in an energy efficient scheme.

Socio-economic impacts

630. Chapter L: Socio-Economics of the ES sets out the socio-economic impacts of the proposed development. The construction of the development is expected to produce temporary, short-term moderate adverse impact in terms of noise, which is proposed to be mitigated through the measures outlined within the CEMP.

631. It is estimated that construction activity related with the proposed development has the potential to support up to 360 FTE jobs during the first two years of construction with on-site employment anticipated to fall to around 170 FTE jobs as construction on Phases 2 and 3 progresses. In addition to the direct employment, it is estimated that up to a further 527 FTE jobs across all sectors of the economy will be supported through indirect employment (i.e. supply chain). The applicant sets out that the construction activity related to the proposed development has potential to support up to 887 FTE jobs in total.

632. Construction activity would also contribute to local economic output and has the potential to generate an average of up to £63.0 million of Gross Value Added (GVA) each year.

Phasing

633. The application proposes that the development will be carried out in phases. The phasing would be agreed by condition but has been indicated as following:

- Phase 1a- College Campus (period of 2.5 years).
  - Redevelopment of existing education facilities (Brooklands College) including the provision of a new sport facility and community facility;
  - All students would remain 'on-site' during the construction period with the work staggered.

- Phase 1b- Southern parcel- residential and SANG (period of 2 years)
  - Comprises the residential development in the southern parcel and SANG;
  - Prior to commencement of development, the remediation of contaminated land would be required.

- Phase 2 Northern parcel- residential (period of 2.5 years)
  - Comprises the residential development in the northern parcel;
  - Prior to commencement of development, the remediation of contaminated land would be required.

- Phase 3- Mansion House, Residential Blocks (period of 2.5 years)
  - Comprises the conversion of the Listed Building and development of surrounding buildings;
  - Seeks to demolish the buildings (Sports Hall, Vickers, etc) next to the Listed Building after they have been reprovided.

Financial considerations

New Homes Bonus Scheme Grant Determination

634. Section 70 subsection 2 of the Town and Country Planning Act 1990 (as amended) states that any local financial considerations are a matter to which local planning authorities must have regard to in determining planning applications; as far as they are material for the application. The weight to be attached to these considerations is a matter for the Council.

635. The New Homes Bonus is a grant paid by central government to local councils for increasing the number of homes and their use. The New Homes Bonus is paid each year for 4 years. It is based on the amount of extra Council Tax revenue raised for new-build homes, conversions and long-term empty homes brought back into use. There is also an extra payment for providing affordable homes. The New Homes Bonus Scheme Grant Determination for 2023/24 is £114,885.

636. Local financial considerations are defined as grants from Government or sums payable to the authority under the Community Infrastructure Levy (CIL). This means that the New Homes Bonus is capable of being a material consideration where relevant. In the current case, the approval of the application would mean

that the New Homes Bonus would be payable for the net increase in dwellings from this development.

Community Infrastructure Levy (CIL)

637. The proposed development is liable for CIL. The applicant has provided the relevant forms in accordance with the relevant regulations.

Planning Obligations

638. Certain aspects o the proposed development would be secured by way of a legal agreement under Section 106. The agreement would include the following:

- Cala receipt to the College of £46,243,390. This is a £40M land receipt and a sum of £6.2M to rebuild the Vickers building
- A Phasing Plan to ensure the College improvements are delivered.
- Affordable Housing: 40% affordable housing in line with the proposed tenure split.
- Green infrastructure:
  - SANG provision of 9.95 hectares and Woodland Management Plan.
  - Creation of a large publicly accessible green space (including recreation and play space) within the Site.
- SAMM Contribution of £205,746.00
- Community and education provision:
- Education agreement.
- Community Use Agreement.
- Pedestrian/cycle link over railway line
- Pedestrian/cycle link between railway and Seven Arches Approach
- Bus stop improvements
- £50,000 funding to The County Highway Authority for a highways and transportation feasibility study relating to the nearby junctions of Heath Road/Brooklands Rd/Hanger Hill/Old Heath Rd/Station Approach.
- Travel Plan monitoring fee

Planning balance and a case for potential 'Very Special Circumstances' (VSCs)

639. Paragraph 148 of the NPPF goes on to state 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.

640. As identified above within the report, harm has also been identified to:

- Bats, a protected species, due to insufficient bat surveys and assessment submitted;
- Trees based on the loss of high quality trees to facilitate the development and potential damage to the retained trees;

- Poor design of some elements (rear elevations of Block D and E);
- Poor quality of the proposed materials (Central and Southern sections);
- Inadequate depth of some of the gardens; and
- Inadequate levels of sunlight to some habitable rooms and gardens.

641. The applicant has put forward the following matters as a case for potential very special circumstances within their Planning Statement:

Benefit	Weight attributed by Applicant
1. The critical need for this development to support the retention, resizing, improvement, and growth of Brooklands College.	Very substantial weight
2. The generation of funds from the development to repay the College's legacy debt, in turn securing the future of the College, as a long term educational asset for Weybridge. Without the sale of excess land for residential development, the College, which is the only vocational further education College in the Borough, would be in an insolvent position, which could result in a forced closure and a land sale to a developer in order to repay the debt.	Very substantial weight
3. The provision of new specialist SEND and ASD accommodation to meet an identified SCC need.	Very substantial weight
4. The economic benefits to be delivered in Weybridge and the wider Elmbridge area as a result of this project.	Substantial weight
5. The Local Plan and five year housing land supply position.	Significant weight
6. The need for market and affordable housing.	Substantial weight
7. Securing the future of a Grade II listed building, returning it back to its original residential use, alongside the enhancement of its setting including reinstatement of its formal gardens.	Substantial weight
8. High-quality design and sustainable development.	Weight
9. The provision of a SANG on site and enhanced	Very substantial weight

biodiversity provision.	
10. In addition to the SANG, provision of a large area of recreation and open space including improved access to nature for the College, future residents, and the existing community.	Moderate weight
11. Provision of enhanced facilities shared between the College and the wider community for example the sports hall, community hub, restaurant, and beauty salon.	Moderate weight

642. In assessing the benefits, it is noted that the College would be downsized but would feature new and refurbished facilities. Part of it would be funded by the Government. Whilst the debt in itself cannot be considered as VSC, the implication of the debt can. Without the repayment of the debt, the College, which is the only Further Education provider in the borough, is likely to be closed. Other options have been explored by the college. The retention of the College would ensure continued provision of FE education and would preserve the current jobs that the College is creating.

643. The proposal would include an improved and expanded SEND and ASD facility on the site. SCC support the need for this and will partially fund the provision.

644. There would be economic benefits, apart from the retention of jobs by saving the College, construction jobs would be created. Whilst these would be temporary, given the scale of the project moderate weight is afforded to this benefit.

645. The proposal would deliver 320 homes broadly in line with the Council's housing mix. Due to the identified harm to the Green Belt, the tilted balance does not kick in. Case law confirms that a shortfall in housing land supply can be a very special circumstance, however it is unlikely to warrant the grant of permission by itself[10].

646. The development would provide 40% affordable housing which is below the policy requirement but supported by viability. It would not provide any 3 or 4 bed properties for which there is the identified need. 4-bed affordable homes comprise the greatest need. As such, significant weight applied to this benefit.

647. Moderate benefit attached to the Listed Building given the harm identified recognising it would be outweighed by heritage benefits.

648. With regard to high quality design, concerns are noted above.

[10] R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185 (Admin)

649. With regard to sustainable development, the sustainability statement sets out there would be some detrimental impacts so this is considered neutral in the end.

650. Limited weight is given to the provision of SANG given that there are outstanding concerns from Natural England on the details. However, it is considered that these concerns can be addressed through the legal agreement and conditions.

651. Limited weight is also attached to ecological improvements. Significant weight is attached to the potential harm to protected species given the concerns raised by Surrey Wildlife Trust and Surrey Bat Group. However, it is considered that the importance of the scheme in respect of ensuring the College can remain operational can be considered as exceptional circumstances to allow further surveys and the detail of the mitigation scheme to be secured by condition. Therefore, it is considered that the harm to protected species can be mitigated by conditions.

652. Limited weight is attached to the provision of open space. Unlike for SANG, it would not be obvious for a member of the public that the open space is intended for public use. Therefore, this is likely to be more of a private benefit for future residents. The creation of the link across the railway joining the site with the wider area would increase the benefit but this cannot be guaranteed at this stage.

653. Moderate weight is attached to the public facilities within the College. Most of it is re-provision of the existing College's offering. However, these will become more publicly accessible and new pedestrian and cycle links are proposed.

	Benefits of the scheme		***Weight afforded to the benefit by the Council***			
		Substantial	*Significant*	*Moderate*	*Limited*	*None*
1.	Need for improved College facilities		●			
2.	Preventing the College from closing down through the repayment of the ESFA debt	●				
3.	The provision of expanded and improved SEND and ASD facilities	●				
4.	Economic benefits			●		
5.	Contribution towards meeting the housing need		●			
6.	Contribution towards affordable housing		●			
7.	Returning the Grade II Listed Building to its original use, alongside			●		

	the enhancement of its setting including reinstatement of its formal gardens					
8.	High-quality design and sustainable development					●
9.	Provision of SANG				●	
10.	Ecological improvements				●	
11.	Provision of large area of recreation and open space				●	
12.	Provision of enhanced facilities shared between the College and the wider community for example the sports hall, community hub, restaurant, and beauty salon, pedestrian and cycle links			●		

640. Therefore in conclusion, officers consider that the following weight is applied in the planning balance:

Substantial weight in favour of the development to be attached to the following benefits:

- Preventing the College from closing down through the repayment of the ESFA debt
- The provision of expanded and improved SEND and ASD facilities

Significant weight in favour of the development to be attached to the following benefits:

- Need for improved College facilities
- Contribution towards meeting the housing need
- Contribution towards affordable housing

Moderate weight in favour of the development to be attached to the following benefits:

- Economic benefits
- Returning the Grade II Listed Building to its original use, alongside the enhancement of its setting including reinstatement of its formal gardens
- Provision of enhanced facilities shared between the College and the wider community for example the sports hall, community hub, restaurant, and beauty salon, pedestrian and cycle links

Limited weight in favour of the development to be attached to the following benefits:

- Provision of SANG
- Ecological improvements
- Provision of large area of recreation and open space

Moderate weight against the development to be attached to the following harm:

- Trees based on the loss of high quality trees to facilitate the development and potential damage to the retained trees.

Limited weight against the development to be attached to the following harm:

- Poor design of some elements (rear elevations of Block D and E);
- Poor quality of the proposed materials (Central and Southern sections);
- Inadequate depth of some of the gardens; and
- Inadequate levels of sunlight to some habitable rooms and gardens.

No weight in favour of the development to be attached to the High-quality design and sustainable development.

641. In conclusion therefore, balancing the harm and benefits of the proposed development scheme, the cumulative benefits are considered to clearly outweigh the identified harm to the Green Belt and any other harm, such that very special circumstances required to justify development in the Green Belt do exist. Therefore, the development proposals would be in accordance with the development plan and the national policy. The proposed development is therefore in accordance with the Development Plan as a whole. Material considerations do not indicate otherwise. Applying NPPF paragraph 11c), permission should be granted "without delay".

642. The Council's 5-year housing supply position at 2021-22 was 4.24 years. As the Council cannot demonstrate the 5-year housing land supply, paragraph 11 d) of the NPPF would be engaged in the event of non-accordance with the development plan as a whole. This requires that permission be granted unless there is a clear reason not to within the meaning of paragraph 11d)i (which is not the case here for the reasons outlined above), or where applying paragraph 11d)ii, the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against policies of the NPPF taken as a whole. As concluded above, the cumulative benefits of the proposals clearly outweigh the identified harm to the Green Belt and any other harm, and in all other respects the adverse impacts of granting permission do not significantly and demonstrably outweigh the benefits of doing so. As a result, in accordance with paragraph 11 d) of the NPPF, permission should be granted. This would be a sufficiently powerful material consideration to justify the grant of planning permission in the event of non-accordance with the development plan as a whole, albeit for the reasons outlined above it is officers' professional

opinion that the proposed development is in fact in accordance with the development plan as a whole.

Matters raised in representations

643. The matters raised in representations have been addressed above.

Conclusion

644. The proposed development constitutes inappropriate development in the Green Belt. It is considered however that the cumulative benefits arising from the scheme clearly outweigh the identified harm and therefore very special circumstances required to justify the development in the Green Belt do exist.

645. Accordingly, the recommendation is to grant planning permission, subject to a receipt of a satisfactory legal agreement and referral to the Secretary of State.

Recommendation A
Subject to the receipt of a satisfactory legal agreement within 6 months of the Committee resolution, or any such extended period as agreed with the Head of Planning and Environmental Health, and subject of the referral to the Secretary of State, the recommendation is to grant planning permission.

Recommendation B
If a satisfactory legal agreement is not completed within 6 months of the Committee resolution, or any such extended period as agreed with the Head of Planning and Environmental Health, delegated authority be given to the Head of Planning and Environmental Health to refuse planning permission for the following reasons:

1. In the absence of a completed legal agreement, the proposed development fails to secure the necessary contribution towards the affordable housing contrary to the requirements of Policy CS21 of the Elmbridge Core Strategy 2011 and the Development Contributions SPD.

2. In the absence of a completed legal agreement to secure highways improvements including a pedestrian/cycle route across the railway line to the south of the site, a route connecting the railway bridge and Seven Arches Approach, a financial contribution towards a transportation feasibility study to the junctions of Heath Road/Brooklands Road/Hangar Hill/Old Heath Road and Station Approach, provision of a car club and monitoring fee associated with the Travel Plans, the proposed development would result in adverse highway and transport implications in the local area. As such, the proposed development is contrary to the aims of Policy CS25 of the Elmbridge Core Strategy 2011, the requirements of the NPPF and the Development Contributions SPD.

3. In the absence of a completed legal agreement to secure funding for Brooklands College to service the debt, the development would not be able to demonstrate very special circumstances which clearly outweigh the harm to

the Green Belt, and any other harm, contrary to Policy DM17 of the Development Management Plan 2015 and the NPPF.

The proposed development does require a CIL payment

Recommendation: **Permit subject to Referral to Secretary of State and Section 106 Agreement**

Conditions/Reasons

1 Time limit (full application)
The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 51 of Part 4 of the Planning and Compulsory Purchase Act 2004.

2 List of approved plans
The development hereby permitted shall be carried out in strict accordance with the following list of approved plans:

Site Location Plan- BA9691-2000 (PRP) received on 10.05.2023
Proposed Site Ground Floor Plan- BA9691-2050 - Rev F (PRP) received on 16.11.2023
Existing Site-Wide Plan- A0- P438 - 3BM - V0 - ZZ - DR - A - 0001 - S0- Rev R02 (3BM) received on 10.05.2023
Existing Site-Wide Plan A1 - P438 - 3BM - V0 - ZZ - DR - A- 0002 - S0 - Rev R02 (3BM) received on 10.05.2023
Proposed Typical Level Unit Type Plan - BA9691-2051-Rev B (PRP) received on 27.10.2023
Illustrative Masterplan - BA9691-2054 (PRP) received on 10.05.2023
Proposed Site Sections Sheet 1 - BA9691-2100 (PRP) received on 10.05.2023
Proposed Site Sections Sheet 2 - BA9691-2101 (PRP) received on 10.05.2023
Proposed Site Sections Sheet 3 - BA9691-2102 (PRP) received on 10.05.2023
Proposed Site Sections Sheet 4 - BA9691-2103 (PRP) received on 10.05.2023
Proposed Site Sections Sheet 5 - BA9691-2104 (PRP) received on 10.05.2023
Proposed Site Sections Sheet 6 - BA9691-2105 (PRP) received on 10.05.2023
College Parking Schedule - Full - P438 - 3BM - V0 - XX - SH - A - 9000 - S0 - Rev R00 (3BM) received on 10.05.2023
Site-Wide Demolition Plan - P438 - 3BM - V0 - ZZ - DR - A0003 - S0 - Rev R01 (3BM) received on 10.05.2023
Existing College Site Plan - P438 - 3BM - V0 - ZZ - DR - A- 0008 - S0 - Rev R01 (3BM) received on 10.05.2023
College Site Demolition Plan - P438 - 3BM - V0 - ZZ - DR - A - 0009 - S0 - Rev R03 (3BM) received on 10.05.2023
Proposed College Site Plan - Roof - P438 - 3BM - V0 - ZZ - DR - A 0010 - S0 Rev R14 (3BM) received on 10.05.2023
Proposed College Site Plan - Ground Floor - P438 - 3BM - V0 - ZZ - DR - A 0011 - S0 Rev R03 (3BM) received on 10.05.2023

Proposed Logistics and Security Plan - P438 - 3BM - V0 - ZZ - DR - A- 0012 - S0 Rev R06(3BM) received on 10.05.2023
Proposed College Parking Plan - P438 - 3BM - V0 - ZZ - DR - A 0014 - S0 Rev R03 (3BM) received on 10.05.2023
Proposed College Site Accessibility Plan - P438 - 3BM - V0 - ZZ - DR - A - 0015 - S0 Rev R01 (3BM) received on 10.05.2023
Barnes Wallis Public Accessibility Plan - P438 - 3BM - V0 - ZZ - DR - A- 0016 - S0 Rev R00 (3BM) received on 10.05.2023
Proposed College Boundary Treatments P438 - 3BM - V0 - ZZ - DR - A- 0017 - S0 Rev R02 (3BM) received on 10.05.2023
Entrance and Approach Design Intent - P438 - 3BM - V0 - ZZ - DR - A- 7000 - S0 Rev R01 (3BM) received on 10.05.2023
Sports Hall GA Plans- Ground Floor - BA9691-2400 - Rev A (PRP) received on 19.09.2023
Sports Hall GA Plans- First Floor - BA9691-2401 – Rev A (PRP) received on 19.09.2023
Sports Hall GA Plans- Roof Plan - BA9691-2402 – Rev A (PRP) received on 19.09.2023
Sports Hall GA Elevations- South East Elevation, North East Elevation - BA9691-2403 Rev A- (PRP) received on 19.09.2023
Sports Hall GA Elevations - North West Elevation, South West Elevation - BA9691-2404 - (PRP) received on 19.09.2023
Sports Hall Refuse Store - BA9691-2421 (PRP) received on 10.05.2023
Barnes Wallis Existing Ground Floor Plan - P438 - 3BM - V1 - 00 - DR - A 0100 - S0 - Rev R01 (3BM) received on 10.05.2023
Barnes Wallis Ground Floor Demolition Plan- P438 - 3BM - V1 - 00 - DR – A 0500 - S0 Rev R06 (3BM) received on 10.05.2023
Barnes Wallis Proposed Ground Floor Plan P438 - 3BM - V1 - 00 - DR – A 1100 - S0 Rev R12 (3BM) received on 10.05.2023
Barnes Wallis Proposed Ground Floor GA Plan P438 - 3BM - V1 - 00 - DR – A 1200 - S0 - Rev R02 (3BM) - received on 10.05.2023
Barnes Wallis Proposed Ground Floor RCP- P438 - 3BM - V1 - 00 - DR – A 1300 - S0- Rev R00 (3BM) - received on 10.05.2023
Barnes Wallis Proposed Ground Floor Finishes Plan- P438 - 3BM - V1 - 00 - DR - A- 400 - S0- Rev R01(3BM) - received on 10.05.2023
Barnes Wallis Existing First Floor Plan- P438 - 3BM - V1 - 01 - DR – A 0101 - S0- Rev R13(3BM) - received on 10.05.2023
Barnes Wallis First Floor Demolition Plan- P438 - 3BM - V1 - 01 - DR – A 0501 - S0- Rev R06 (3BM) - received on 10.05.2023
Barnes Wallis Proposed First Floor Plan- P438 - 3BM - V1 - 01 - DR – A 1101 - S0- Rev R13 (3BM) - received on 10.05.2023
Barnes Wallis Proposed First Floor GA Plan- P438 - 3BM - V1 - 01 - DR – A 1201 - S0- Rev R01 (3BM) - received on 10.05.2023
Barnes Wallis Proposed First Floor RCP- P438 - 3BM - V1 - 01 - DR – A 1301 - S0- Rev R00 (3BM) - received on 10.05.2023
Barnes Wallis Proposed First Floor Finishes Plan- P438 - 3BM - V1 - 01 - DR – A 1401 - S0- Rev R00 (3BM) - received on 10.05.2023
Barnes Wallis Existing Second Floor Plan- P438 - 3BM - V1 - 02 - DR – A 0102 - S0- Rev R01 (3BM) - received on 10.05.2023

Barnes Wallis Second Floor Demolition Plan- P438 - 3BM - V1 - 02 - DR – A 0502 - S0- Rev R06 (3BM) - received on 10.05.2023
Barnes Wallis Proposed Second Floor Plan- P438 - 3BM - V1 - 02 - DR – A 1102 - S0- Rev R12 (3BM) - received on 10.05.2023
Barnes Wallis Proposed Second Floor GA Plan- P438 - 3BM - V1 - 02 - DR – A 1202 - S0- Rev R00 (3BM) - received on 10.05.2023
Barnes Wallis Proposed Second Floor RCP- P438 - 3BM - V1 - 02 - DR – A 1302 - S0- Rev R00 (3BM) - received on 10.05.2023
Barnes Wallis Proposed Second Floor Finishes Plan- P438 - 3BM - V1 - 02 - DR – A 1402 - S0- Rev R00 (3BM) - received on 10.05.2023
Barnes Wallis Existing Roof Plan- P438 - 3BM - V1 - 04 - DR – A 0104 - S0- Rev R00 (3BM) - received on 10.05.2023
Barnes Wallis Proposed Roof GA Plan P438 - 3BM - V1 - 04 - DR – A 1204 - S0- Rev R01 (3BM) - received on 10.05.2023
Barnes Wallis Existing North and East Elevations- P438 - 3BM - V1 - ZZ - DR – A 2000 - S0- Rev R00 (3BM) - received on 10.05.2023
Barnes Wallis Existing South and West Elevations- P438 - 3BM - V1 - ZZ - DR – A 2001 - S0- Rev R00 (3BM) - received on 10.05.2023
Barnes Wallis North and East Demolition Elevations P438 - 3BM - V1 - ZZ - DR – A 2050 - S0- Rev R00 (3BM) - received on 10.05.2023
Barnes Wallis South and West Demolition Elevations P438 - 3BM - V1 - ZZ - DR – A 2051 - S0- Rev R00 (3BM) - received on 10.05.2023
Barnes Wallis Proposed North and East Elevations- P438 - 3BM - V1 - ZZ - DR – A 2100 - S0- Rev R03 (3BM) - received on 10.05.2023
Barnes Wallis Proposed South and West Elevations P438 - 3BM - V1 - ZZ - DR – A 2101 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Existing Ground Floor Plan- P438 - 3BM - V2 - 00 - DR – A 0101 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Ground Floor Demolition Plan- P438 - 3BM - V2 - 00 - DR – A 0501 - S0- Rev R02 (3BM) - received on 10.05.2023
Tower Proposed Ground Floor Plan- P438 - 3BM - V2 - 00 - DR – A 1101 - S0 - Rev R06 (3BM) - received on 10.05.2023
Tower Proposed Ground Floor GA Plan- P438 - 3BM - V2 - 00 - DR – A 1200 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Proposed Ground Floor Reflected Ceiling Plan- P438 - 3BM - V2 - 00 - DR – A 1301 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Proposed Ground Floor Finishes Plan- P438 - 3BM - V2 - 00 - DR – A 1401 - S0- - Rev R01 (3BM) - received on 10.05.2023
Tower Existing First Floor Plan- P438 - 3BM - V2 - 01 - DR – A 0102 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower First Floor Demolition Plan- P438 - 3BM - V2 - 01 - DR – A 0502 - S0- Rev R02 (3BM) - received on 10.05.2023
Tower Proposed First Floor Plan- P438 - 3BM - V2 - 01 - DR – A 1102 - S0- Rev R06 (3BM) - received on 10.05.2023
Tower Proposed First Floor GA Plan- P438 - 3BM - V2 - 01 - DR – A 1201 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Proposed First Floor Reflected Ceiling Plan- P438 - 3BM - V2 - 01 - DR – A 1302 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Proposed First Floor Finishes Plan- P438 - 3BM - V2 - 01 - DR – A 1402 - S0- Rev R01 (3BM) - received on 10.05.2023

Tower Existing Second Floor Plan- P438 - 3BM - V2 - 02 - DR – A 0103 - S0 - Rev R01 (3BM) - received on 10.05.2023
Tower Second Floor Demolition Plan- P438 - 3BM - V2 - 02 - DR – A 0503 - S0- Rev R02 (3BM) - received on 10.05.2023
Tower Proposed Second Floor Plan- P438 - 3BM - V2 - 02 - DR - A - 1103 - S0- Rev R06 (3BM) - received on 10.05.2023
Tower Proposed Second Floor GA Plan- P438 - 3BM - V2 - 02 - DR – A 1202 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Proposed Second Floor Reflected Ceiling Plan- P438 - 3BM - V2 - 02 - DR – A 1303 - S0 - Rev R01 (3BM) - received on 10.05.2023
Tower Proposed Second Floor Finishes Plan- P438 - 3BM - V2 - 02 - DR - A 1403 - S0 - Rev R01 (3BM) - received on 10.05.2023
Tower Existing Third Floor Plan- P438 - 3BM - V2 - 03 - DR – A 0104 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Third Floor Demolition Plan- P438 - 3BM - V2 - 03 - DR – A 0504 - S0- Rev R02 (3BM) - received on 10.05.2023
Tower Proposed Third Floor Plan- P438 - 3BM - V2 - 03 - DR – A 1104 - S0- Rev R06 (3BM) - received on 10.05.2023
Tower Proposed Third Floor GA Plan P438 - 3BM - V2 - 03 - DR – A 1203 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Proposed Third Floor Reflected Ceiling Plan- P438 - 3BM - V2 - 03 - DR – A 1304 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Proposed Third Floor Finishes Plan- P438 - 3BM - V2 - 03 - DR – A 1404 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Existing Fourth Floor Plan- P438 - 3BM - V2 - 04 - DR – A 0105 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Fourth Floor Demolition Plan- P438 - 3BM - V2 - 04 - DR – A 0505 - S0- Rev R02 (3BM) - received on 10.05.2023
Tower Proposed Fourth Floor Plan- P438 - 3BM - V2 - 04 - DR – A 1105 - S0- Rev R06 (3BM) - received on 10.05.2023
Tower Proposed Fourth Floor GA Plan- P438 - 3BM - V2 - 04 - DR – A 1204 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Proposed Fourth Floor Reflected Ceiling Plan- P438 - 3BM - V2 - 04 - DR – A 1305 - S0- Rev R01 (3BM) - received on 10.05.2023
Tower Proposed Fourth Floor Finishes Plan- P438 - 3BM - V2 - 04 - DR – A 1405 - S0- - Rev R01 (3BM) - received on 10.05.2023
Tower Existing Elevations- P438 - 3BM - V2 - ZZ - DR – A 2000 - S0- Rev R00 (3BM) - received on 10.05.2023
Tower Demolition Elevations- P438 - 3BM - V2 - ZZ - DR – A 2050 - S0- Rev R00 (3BM) - received on 10.05.2023
Tower Proposed Elevations- P438 - 3BM - V2 - ZZ - DR – A 2100 - S0- Rev R03 (3BM) - received on 29.09.2023
Tower Proposed Entrance Elevation- P438 - 3BM - V2 - ZZ - DR – A 2100 - S0- Rev R02 (3BM) - received on 29.09.2023
Tower Existing Construction Section- P438 - 3BM - V2 - ZZ - DR – A 5000 - S0- Rev R00 (3BM) - received on 10.05.2023
Tower Proposed Construction Section P438 - 3BM - V2 - ZZ - DR – A 5100 - S0 Rev R02 (3BM) - received on 29.09.2023
Edge Existing Ground Floor Plan- P438 - 3BM - V3 - 00 - DR – A 0100 - S0- Rev R01 (3BM) - received on 10.05.2023

Edge Ground Floor Demolition Plan- P438 - 3BM - V3 - 00 - DR – A 0500 - S0- Rev R05 (3BM) - received on 10.05.2023
Edge Proposed Ground Floor Plan (Illustrative)- P438 - 3BM - V3 - 00 - DR – A 1100 - S0- Rev R10 (3BM) - received on 10.05.2023
Edge Proposed Ground Floor GA Plan P438 - 3BM - V3 - 00 - DR – A 1200 - S0- Rev R02 (3BM) - received on 10.05.2023
Edge Proposed Ground Floor Reflected Ceiling Plan- P438 - 3BM - V3 - 00 - DR – A 1300 - S0- Rev R02 (3BM) - received on 10.05.2023
Edge Proposed Ground Floor Finishes Plan- P438 - 3BM - V3 - 00 - DR – A 1400 - S0- Rev R03 (3BM) - received on 10.05.2023
Edge Existing First Floor Plan P438 - 3BM - V3 - 01 - DR – A 0101 - S0- Rev R01 (3BM) - received on 10.05.2023
Edge First Floor Demolition Plan- P438 - 3BM - V3 - 01 - DR – A 0501 - S0- Rev R04 (3BM) - received on 10.05.2023
Edge Proposed First Floor Plan- P438 - 3BM - V3 - 01 - DR – A 1101 - S0- Rev R10 (3BM) - received on 10.05.2023
Edge Proposed First Floor GA Plan- P438 - 3BM - V3 - 01 - DR – A 1201 - S0- Rev R01 (3BM) - received on 10.05.2023
Edge Proposed First Floor Reflected Ceiling Plan- P438 - 3BM - V3 - 01 - DR – A 1301 - S0- Rev R01 (3BM) - received on 10.05.2023
Edge Proposed First Floor Finishes Plan- P438 - 3BM - V3 - 01 - DR – A 1401 - S0- Rev R02 (3BM) - received on 10.05.2023
Edge Existing Second Floor Plan- P438 - 3BM - V3 - 02 - DR – A 0102 - S0- Rev R01 (3BM) - received on 10.05.2023
Edge Second Floor Demolition Plan- P438 - 3BM - V3 - 02 - DR – A 0502- Rev R04 (3BM) - received on 10.05.2023
Edge Proposed Second Floor Plan- P438 - 3BM - V3 - 02 - DR – A 1102 - S0- Rev R07 (3BM) - received on 10.05.2023
Edge Proposed Second Floor GA Plan P438 - 3BM - V3 - 02 - DR – A 1202 - S0- Rev R00 (3BM) - received on 10.05.2023
Edge Proposed Second Floor Reflected Ceiling Plan- P438 - 3BM - V3 - 02 - DR – A 1302 - S0- Rev R00 (3BM) - received on 10.05.2023
Edge Proposed Second Floor Finishes Plan- P438 - 3BM - V3 - 02 - DR – A 1402 - S0 - Rev R01 (3BM) - received on 10.05.2023
Edge Existing Roof Plan- P438 - 3BM - V3 - 03 - DR – A 0103 - S0- Rev R00 (3BM) - received on 10.05.2023
Edge Roof Demolition Plan- P438 - 3BM - V3 - 03 - DR – A 0503 - S0- Rev R00 (3BM) - received on 10.05.2023
Edge Proposed Roof GA Plan P438 - 3BM - V3 - 03 - DR – A 1203 - S0- Rev R00 (3BM) - received on 10.05.2023
Edge Existing South and West Elevations- P438 - 3BM - V3 - ZZ - DR – A 2000 - S0- Rev R00 (3BM) - received on 10.05.2023
Edge Existing North and East Elevations- P438 - 3BM - V3 - ZZ - DR – A 2001 - S0- Rev R00 (3BM) - received on 10.05.2023
Edge South and West Demolition Elevations- P438 - 3BM - V3 - ZZ - DR – A 2050 - S0- Rev R00 (3BM) - received on 10.05.2023
Edge North and East Demolition Elevations- P438 - 3BM - V3 - ZZ - DR – A 2051 - S0- Rev R00 (3BM) - received on 10.05.2023
Edge Proposed South and West Elevations- P438 - 3BM - V3 - ZZ - DR – A 2100 - S0- Rev R00 (3BM) - received on 10.05.2023

Edge Proposed North and East Elevations- P438 - 3BM - V3 - ZZ - DR – A 2101 - S0- Rev R00 (3BM) - received on 10.05.2023
Locke King Existing Ground Floor Plan- P438 - 3BM - V4 - 00 - DR – A 0100 - S0- Rev R00 (3BM) - received on 10.05.2023
Locke King Ground Floor Demolition Plan- P438 - 3BM - V4 - 00 - DR – A 0500 - S0- Rev R04 (3BM) - received on 10.05.2023
Locke King Proposed Ground Floor Plan- P438 - 3BM - V4 - 00 - DR – A 1100 - S0- Rev R07 (3BM) - received on 10.05.2023
Locke King Proposed GF GA Plan- P438 - 3BM - V4 - 00 - DR – A 1200 - S0- Rev R01 (3BM) - received on 10.05.2023
Locke King Proposed Ground Floor RCP- P438 - 3BM - V4 - 00 - DR – A 1300 - S0- Rev R01 (3BM) - received on 10.05.2023
Locke King Proposed Ground Floor Finishes Plan- P438 - 3BM - V4 - 00 - DR – A 1400 - S0- Rev R01 (3BM) - received on 10.05.2023
Locke King Existing First Floor Plan- P438 - 3BM - V4 - 01 - DR – A 0101 - S0- Rev R00 (3BM) - received on 10.05.2023
Locke King First Floor Demolition Plan- P438 - 3BM - V4 - 01 - DR – A 0501 - S0- Rev R03 (3BM) - received on 10.05.2023
Locke King Proposed First Floor Plan- P438 - 3BM - V4 - 01 - DR – A 1101 - S0- Rev R06 (3BM) - received on 10.05.2023
Locke King Proposed FF GA Plan- P438 - 3BM - V4 - 01 - DR – A 1201 - S0- Rev R00 (3BM) - received on 10.05.2023
Locke King Proposed First Floor RCP- P438 - 3BM - V4 - 01 - DR – A 1301 - S0- Rev R00 (3BM) - received on 10.05.2023
Locke King Proposed First Floor Finishes Plan- P438 - 3BM - V4 - 01 - DR - A - 401 - S0- Rev R00 (3BM) - received on 10.05.2023
Locke King Existing Second Floor Plan- P438 - 3BM - V4 - 02 - DR – A 0102 - S0- Rev R00 (3BM) - received on 10.05.2023
Locke King Second Floor Demolition Plan- P438 - 3BM - V4 - 02 - DR - A - S0 0502- Rev R03 (3BM) - received on 10.05.2023
Locke King Proposed Second Floor Plan- P438 - 3BM - V4 - 02 - DR – A 1102 - S0- Rev R07 (3BM) - received on 10.05.2023
Locke King Proposed SF GA Plan- P438 - 3BM - V4 - 02 - DR – A 1202 - S0- Rev R01 (3BM) - received on 10.05.2023
Locke King Proposed Second Floor RCP- P438 - 3BM - V4 - 02 - DR – A 1302 - S0- Rev R00 (3BM) - received on 10.05.2023
Locke King Proposed Second Floor Finishes Plan- P438 - 3BM - V4 - 02 - DR – A 1402 - S0- Rev R01 (3BM) - received on 10.05.2023
Locke King Existing South and West Elevations- P438 - 3BM - V4 - ZZ - DR – A 2000 - S0- Rev R00 (3BM) - received on 10.05.2023
Locke King Existing North and East Elevations- P438 - 3BM - V4 - ZZ - DR – A 2001 - S0- Rev R00 (3BM) - received on 10.05.2023
Locke King South and West Demolition Elevations- P438 - 3BM - V4 - ZZ - DR – A 2050 - S0- Rev R00 (3BM) - received on 10.05.2023
Locke King North and East Demolition Elevations P438 - 3BM - V4 - ZZ - DR – A 2051 - S0- Rev R00 (3BM) - received on 10.05.2023
Locke King Proposed South and West Elevations P438 - 3BM - V4 - ZZ - DR – A 2100 - S0- Rev R01 (3BM) - received on 10.05.2023
Locke King Proposed North and East Elevations P438 - 3BM - V4 - ZZ - DR – A 2101 - S0- Rev R00 (3BM) - received on 10.05.2023

Hawker Existing Plan P438 - 3BM - V5 - 00 - DR – A 0100 - S0- Rev R01 (3BM) - received on 10.05.2023
Hawker Demolition Plan- P438 - 3BM - V5 - 00 - DR – A 0500- Rev R02 (3BM) - received on 10.05.2023
Hawker Proposed Plan- P438 - 3BM - V5 - 00 - DR – A 1100 - S0- Rev R03 (3BM) - received on 10.05.2023
Hawker Proposed Roof Plan- P438 - 3BM - V5 - 01 - DR – A 1101 - S0- Rev R01 (3BM) - received on 10.05.2023
Hawker Existing Elevations- P438 - 3BM - V5 - ZZ - DR – A 2000 - S0- Rev R01 (3BM) - received on 10.05.2023
Hawker Demolition Elevations- P438 - 3BM - V5 - ZZ - DR – A 2050 - S0- Rev R01 (3BM) - received on 10.05.2023
Hawker Proposed Elevations- P438 - 3BM - V5 - ZZ - DR – A 2100 - S0- Rev R01 (3BM) - received on 10.05.2023
Hawker Localised North Elevations- P438 - 3BM - V5 - ZZ - DR – A 2500 - S0- Rev R00 (3BM) - received on 10.05.2023
Hawker Localised South Elevation- P438 - 3BM - V5 - ZZ - DR – A 2501 - S0- Rev R00 (3BM) - received on 10.05.2023
Admin Existing Floor Plan- P438 - 3BM - V6 - 00 - DR – A 0100 - S0- Rev R00 (3BM) - received on 10.05.2023
Admin Ground Floor Demolition Plan- P438 - 3BM - V6 - 00 - DR – A 0500 - S0- Rev R01 (3BM) - received on 10.05.2023
Admin Proposed Floor Plan- P438 - 3BM - V6 - 00 - DR – A 1100 - S0- Rev R00 (3BM) - received on 10.05.2023
Admin Proposed GA Plan- P438 - 3BM - V6 - 00 - DR – A 1200 - S0- Rev R00 (3BM) - received on 10.05.2023
Admin Proposed Reflected Ceiling Plan- P438 - 3BM - V6 - 00 - DR – A 1300 - S0- Rev R00 (3BM) - received on 10.05.2023
Admin Proposed Finishes Plan- P438 - 3BM - V6 - 00 - DR – A 1400 - S0- Rev R00 (3BM) - received on 10.05.2023
Admin Existing Elevations- P438 - 3BM - V6 - ZZ - DR – A 2000 - S0- Rev R00 (3BM) - received on 10.05.2023
Admin Demolition Elevations- P438 - 3BM - V6 - ZZ - DR – A 2050 - S0- Rev R00 (3BM) - received on 10.05.2023
Admin Proposed Elevations- P438 - 3BM - V6 - ZZ - DR – A 2100 - S1- Rev R00 (3BM) - received on 10.05.2023
External Compound 01A Design Intent (External college bin store)- P438 - 3BM - V7 - Z - DR – A 1110 - S0- Rev R03 (3BM) - received on 10.05.2023
External Compound 01B Design Intent (Sub station college)- P438 - 3BM - V7 - ZZ - DR – A 1115 - S0- Rev R00 (3BM) - received on 10.05.2023
External Compound 02 Design Intent (Plant equipment)- P438 - 3BM - V7 - ZZ - DR – A 1120 - S0- Rev R01 (3BM) - received on 10.05.2023
External Compound 03 Design Intent (Plant equipment)- P438 - 3BM - V7 - ZZ - DR – A 1130 - S0- Rev R01 (3BM) - received on 10.05.2023
External Compound 04 Design Intent (Storage)- P438 - 3BM - V7 - ZZ - DR – A 1140 - S0- Rev R01 (3BM) - received on 10.05.2023
External Compound 05 Design Intent (Plant equipment)- P438 - 3BM - V7 - ZZ - R A 1150 - S0- Rev R00 (3BM) - received on 10.05.2023
Bicycle Store 1 Design Intent- P438 - 3BM - V7 - ZZ - DR – A 1160 - S0- Rev R01 (3BM) - received on 10.05.2023

Bicycle Store 2 Design Intent- P438 - 3BM - V7 - ZZ - DR – A 1161 - S0- Rev R00 (3BM) - received on 10.05.2023
Bicycle Store 3 and 4 Design Intent- P438 - 3BM - V7 - ZZ - DR – A 1162 - S0- Rev R00 (3BM) - received on 10.05.2023
Bicycle Store 5 Design Intent – Staff- P438 - 3BM - V7 - ZZ - DR – A 1170 - S0- Rev R00 (3BM) - received on 10.05.2023
Vickers Building Proposed Ground Floor Plan P463 - 3BM - V1 - 00 - DR – A 1100 - S0- Rev R06 (3BM) - received on 10.05.2023
Vickers Building Proposed Ground Floor GA Plan- P463 - 3BM - V1 - 00 - DR – A 1200 - S0- Rev R02 (3BM) - received on 10.05.2023
Vickers Building Proposed Ground Floor Reflected Ceiling Plan- P463 - 3BM - V1 - 00 - DR – A 1300 - S0- Rev R02 (3BM) - received on 10.05.2023
Vickers Building Proposed Ground Floor Finishes Plan- P463 - 3BM - V1 - 00 - DR – A 1400- Rev R01 (3BM) - received on 10.05.2023
Vickers Building Proposed First Floor Plan- P463 - 3BM - V1 - 01 - DR – A 1101- Rev R03 (3BM) - received on 10.05.2023
Vickers Building Proposed First Floor GA Plan- P463 - 3BM - V1 - 01 - DR – A 1201 - S0- Rev R01 (3BM) - received on 10.05.2023
Vickers Building Proposed First Floor Reflected Ceiling Plan P463 - 3BM - V1 - 01 - DR – A 1301 - S0- Rev R02 (3BM) - received on 10.05.2023
Vickers Building Proposed First Floor Finishes Plan- P463 - 3BM - V1 - 01 - DR – A 1401 - S0- Rev R00 (3BM) - received on 10.05.2023
Vickers Building Proposed Second Floor Plan- P463 - 3BM - V1 - 02 - DR – A 1102 - S0- Rev R03 (3BM) - received on 10.05.2023
Vickers Building Proposed Second Floor GA Plan- P463 - 3BM - V1 - 02 - DR – A 1202 - S0- Rev R01 (3BM) - received on 10.05.2023
Vickers Building Proposed Second Floor Reflected Ceiling Plan- P463 - 3BM - V1 - 02 - DR – A 1302 - S0- Rev R02 (3BM) - received on 10.05.2023
Vickers Building Proposed Second Floor Finishes Plan- P463 - 3BM - V1 - 02 - DR – A 1402 - S0- Rev R00 (3BM) - received on 10.05.2023
Vickers Building Proposed Roof Plan- P463 - 3BM - V1 - 04 - DR – A 1103 - S0- Rev R03 (3BM) - received on 10.05.2023
Vickers Building Proposed Elevations P463 - 3BM - V1 - ZZ - DR – A 2100 - S0- Rev R04 (3BM) - received on 10.05.2023
Vickers Building Bay Elevation and Construction Section 1- P463 - 3BM - V1 - ZZ - DR - A - S0 5000- Rev R00 (3BM) - received on 10.05.2023
Vickers Building Bay Elevation and Construction Section 2- P463 - 3BM - V1 - ZZ - DR - A - S0 5001- Rev R00 (3BM) - received on 10.05.2023
Vickers Building Bay Elevation and Construction Section 3- P463 - 3BM - V1 - ZZ - DR - A - S0 5002- Rev R00 (3BM) - received on 10.05.2023
Vickers Building Fenestration Arrangement Types – Sheet 1 P463 - 3BM - V1 - ZZ - DR – A 6200 - S0- Rev R00 (3BM) - received on 10.05.2023
Vickers Building Fenestration Arrangement Types – Sheet 2 P463 - 3BM - V1 - ZZ - DR – A 6201 - S1- Rev R00 (3BM) - received on 10.05.2023
Vickers Building Fenestration Arrangement Types – Sheet 3 P463 - 3BM - V1 - ZZ - DR – A 6202 - S2- Rev R00 (3BM) - received on 10.05.2023
House Type 1 3B5P 2st- BA9691-2200 (PRP) - received on 10.05.2023
House Type 2 3B4P 2st- BA9691-2201 (PRP) - received on 10.05.2023
House Type 3 3B4P 2st- BA9691-2202 (PRP) - received on 10.05.2023

House Type 1 and 4 3B5P and 3B5P 2st Sheet 1/2-BA9691-2203 (PRP) - received on 10.05.2023
House Type 1 and 4 3B5P and 3B5P 2st Sheet 2/2- BA9691-2204 (PRP) - received on 10.05.2023
House Type 5 3B5P 2st Sheet 1/3- BA9691-2205 (PRP) - received on 10.05.2023
House Type 5 3B5P 2st Sheet 2/3- BA9691-2206 (PRP) - received on 10.05.2023
House Type 5 3B5P 2st Sheet 3/3- BA9691-2207 (PRP) - received on 10.05.2023
House Type 6 3B5P 2st- BA9691-2208(PRP) - received on 10.05.2023
House Type 7 3B5P 2st- BA9691-2209(PRP) - received on 10.05.2023
House Type 8 4B7P 3st Sheet 1/2-BA9691-2210- Rev A (PRP) - received on 10.05.2023
House Type 8 4B7P 3st Sheet 2/2- BA9691-2211- Rev A (PRP) - received on 10.05.2023
House Type 9 4B6P 2.5st Sheet 1/2-BA9691-2212(PRP) - received on 10.05.2023
House Type 9 4B6P 2.5st Sheet 2/2- BA9691-2213(PRP) - received on 10.05.2023
House Type 10 4B6P 2.5st- BA9691-2214(PRP) - received on 10.05.2023
House Type 11 4B8P 3st Sheet 1/3 BA9691-2215(PRP) - received on 10.05.2023
House Type 11 4B8P 3st Sheet 2/3- BA9691-2216 (PRP) - received on 10.05.2023
House Type 11 4B8P 3st Sheet 3/3- BA9691-2217- (PRP) - received on 10.05.2023
Block A GA Plans Ground Floor & First Floor - BA9691-2300- Rev B (PRP) - received on 23.10.2023
Block A GA Plans Second Floor & Third Floor- BA9691-2301- Rev B (PRP) - received on 23.10.2023
Block A GA Plans Fourth Floor & Roof Plan- BA9691-2302- Rev B (PRP) - received on 23.10.2023
Block A GA Elevations- South East Elevation, South West Elevation- BA9691-2303- Rev A (PRP) - received on 19.09.2023
Block A GA Elevations- North West Elevation, North East Elevation- BA9691-2304- Rev A (PRP) - received on 19.09.2023
Block B GA Elevations- South West Elevation, South East Elevation- BA9691-2313- Rev B (PRP) - received on 13.11.2023
Block B GA Elevations- North West Elevation, North East Elevation- BA9691-2314- Rev A (PRP) - received on 19.09.2023
Block C GA Elevations- South West Elevation, North West Elevation- BA9691-2324- Rev A (PRP) - received on 15.11.2023
Block D GA Plans- Ground Floor & First Floor- BA9691-2330- Rev B (PRP) - received on 23.10.2023
Block D GA Plans- Second Floor & Third Floor- BA9691-2331- Rev B (PRP) - received on 23.10.2023
Block D GA Elevations South West Elevation, South East Elevation- BA9691-2334- Rev A (PRP) - received on 19.09.2023

Block D GA Elevations South West & North East Internal Elevations- BA9691-2335- Rev B (PRP) - received on 19.09.2023
Block E GA Plans Ground Floor- BA9691-2340- Rev C (PRP) - received on 23.10.2023
Block E GA Plans- First Floor BA9691-2341- Rev B (PRP) - received on 23.10.2023
Block E GA Plans- Second Floor- BA9691-2342- Rev B (PRP) - received on 23.10.2023
Block E GA Plans- Third Floor BA9691-2343- Rev B (PRP) - received on 23.10.2023
Block E GA Elevations East, Internal East, Internal West Elevations- BA9691-2346- Rev A (PRP) - received on 19.09.2023
Block G GA Elevations- North East Elevation, South East Elevation- BA9691-2364- Rev A (PRP) - received on 19.09.2023
Block H-J GA Plans- Roof Plan- BA9691-2375- Rev B (PRP) - received on 23.10.2023
Block H-J GA Elevations- South East Elevation, North East Elevation BA9691-2376 - Rev A (PRP) - received on 19.09.2023
Block H-J GA Elevations- South West Elevation, North West Elevation- BA9691-2377 - Rev A (PRP) - received on 19.09.2023
Proposed Ground Floor Plan- L (00) 201- Rev A (Roger Mears) - received on 19.09.2023
Ground Floor- Internal room elevations G07- L (00) 302- Rev A (Roger Mears) - received on 19.09.2023
Ground Floor Internal room elevations G08- L (00) 303- Rev A (Roger Mears) - received on 19.09.2023
Ground Floor Internal room elevations G09- L (00) 304- Rev A (Roger Mears) - received on 19.09.2023
Ground Floor- Internal room elevations G11- L (00) 306- Rev A (Roger Mears) - received on 19.09.2023
Ground Floor- Internal room elevations G15 & G16- L (00) 308- Rev B (Roger Mears) - received on 19.09.2023
Ground Floor- Internal room elevations G18- L (00) 309- Rev B (Roger Mears) - received on 19.09.2023
First Floor- Internal room elevations F08- L (00) 310- Rev A (Roger Mears) - received on 19.09.2023
Block B GA Plans- Ground Floor & First Floor BA9691-2310- Rev A (PRP) - received on 23.10.2023
Block B GA Plans- Second Floor & Third Floor- BA9691-2311-Rev A (PRP) - received on 23.10.2023
Block B GA Plans Roof Plan- BA9691-2312- Rev A (PRP) - received on 23.10.2023
Block C GA Plans- Ground Floor & First Floor BA9691-2320-Rev A (PRP) - received on 23.10.2023
Block C GA Plans Second Floor & Third Floor BA9691-2321-Rev A (PRP) - received on 23.10.2023
Block C GA Plans Roof Plan- BA9691-2322- Rev A (PRP) - received on 23.10.2023
Block D GA Plans- Roof Plan- BA9691-2332-Rev B (PRP) - received on 23.10.2023

Block E GA Plans- Roof Plan- BA9691-2344-Rev B (PRP) - received on 23.10.2023
Block F GA Plans- Ground Floor & First Floor- BA9691-2350- Rev A (PRP) - received on 23.10.2023
Block F GA Plans- Second Floor & Roof Plan- BA9691-2351- Rev A (PRP) - received on 23.10.2023
Block G GA Plans- Lower Ground Floor- BA9691-2360- Rev B (PRP) - received on 23.10.2023
Block G GA Plans- Ground Floor Plan BA9691-2361- Rev A (PRP) - received on 23.10.2023
Block G GA Plans- First Floor & Second Floor BA9691-2362- Rev A (PRP) - received on 23.10.2023
Block G GA Plans- Roof Plan- BA9691-2363- Rev A (PRP) - received on 23.10.2023
Block H-J GA Plans- Lower Ground Floor Plan- BA9691-2370- Rev B (PRP) - received on 23.10.2023
Block H-J GA Plans- Ground Floor Plan- BA9691-2371- Rev A (PRP) - received on 23.10.2023
Block H-J GA Plans- First Floor- BA9691-2372- Rev A (PRP) - received on 23.10.2023
Block H-J GA Plans- Second Floor Plan- BA9691-2373- Rev A (PRP) - received on 23.10.2023
Block H-J GA Plans- Third Floor Plan BA9691-2374- Rev A (PRP) - received on 23.10.2023
Block I GA Plans- Lower Ground Floor Plan- BA9691-2380- Rev B (PRP) - received on 23.10.2023
Block I GA Plans- Ground Floor Plan BA9691-2381- Rev A (PRP) - received on 23.10.2023
Block I GA Plans- First Floor & Second Floor- BA9691-2382- Rev A (PRP) - received on 23.10.2023
Block I GA Plans- Roof Plan- BA9691-2383- Rev A (PRP) - received on 23.10.2023
Block K GA Plans- Ground & First Floor Plan-BA9691-2500- Rev A (PRP) - received on 23.10.2023
Block K GA Plans- Second Floor & Roof Plan- BA9691-2501- Rev A (PRP) - received on 23.10.2023
Block L GA Plans- Ground Floor & First Floor BA9691-2510- Rev A (PRP) - received on 23.10.2023
Block L GA Plans- Second Floor & Third Floor- BA9691-2511- Rev A (PRP) - received on 23.10.2023
Block L GA Plans- Roof Plan- BA9691-2512- Rev A (PRP) - received on 23.10.2023
General Arrangement DE 499_001- Rev A (Define) - received on 27.10.2023
Detailed Landscape Plan 1- DE 499_101- Rev A (Define) - received on 27.10.2023
Detailed Landscape Plan 2- DE 499_102- Rev A (Define) - received on 27.10.2023
Detailed Landscape Plan 3- DE 499_103- Rev A (Define) - received on 27.10.2023

Detailed Landscape Plan 4- DE 499_104- Rev A (Define) - received on 27.10.2023
Detailed Landscape Plan 5- DE 499_105- Rev A (Define) - received on 27.10.2023
Mansion Detailed Landscape- DE 499_106- Rev A (Define) - received on 27.10.2023
Landscape Boundary Treatments- DE 499_PL_211- Rev A (Define) - received on 27.10.2023
SANG/Western Woodland Plan- DE 499_PL_213- Rev A (Define) - received on 27.10.2023
Public Open Space Plan- DE 499_PL_212- Rev A (Define) - received on 27.10.2023
Typical floor upgrade: ground floor- C (23) 002- August 2023 (Roger Mears)- received on 19.09.2023
Typical floor upgrade: upper floors- C (23)-011 - August 2023 (Roger Mears)- received on 19.09.2023
Existing Site Plan- L (00) 000- (Roger Mears) - received on 10.05.2023
Proposed Site Plan- L (00) 010- (Roger Mears) - received on 10.05.2023
Existing Basement Plan L (00) 100- (Roger Mears) - received on 10.05.2023
Existing Ground Floor Plan- L (00) 101- (Roger Mears) - received on 10.05.2023
Existing First Floor Plan- L (00) 102- (Roger Mears) - received on 10.05.2023
Existing Second Floor Plan- L (00) 103- (Roger Mears) - received on 10.05.2023
Existing Third Floor Plan- L (00) 104- (Roger Mears) - received on 10.05.2023
Existing Roof Floor Plan- L (00) 105- (Roger Mears) - received on 10.05.2023
Existing North Elevation (Front)- L (00) 106- (Roger Mears) - received on 10.05.2023
Existing South Elevation (Rear)- L (00) 107- (Roger Mears) - received on 10.05.2023
Existing East Elevation (Side) L (00) 108- (Roger Mears) - received on 10.05.2023
Existing West Elevation (Side) L (00) 109- (Roger Mears) - received on 10.05.2023
Proposed First Floor Plan- L (00) 202- (Roger Mears) - received on 10.05.2023
Proposed Second Floor Plan- L (00) 203- (Roger Mears) - received on 10.05.2023
Proposed Third & Fourth Floor Plans L (00) 204- (Roger Mears) - received on 10.05.2023
Proposed Roof Plan- L (00) 205- (Roger Mears) - received on 10.05.2023
Proposed North Elevation (Front)- L (00) 206- (Roger Mears) - received on 10.05.2023
Proposed South Elevation (Rear)- L (00) 207- (Roger Mears) - received on 10.05.2023
Proposed East Elevation (Side)- L (00) 208- (Roger Mears) - received on 10.05.2023
Proposed West Elevation (Side)- L (00) 209- (Roger Mears) - received on 10.05.2023

Proposed Site Section showing solar panels - L (00) 210- (Roger Mears) - received on 10.05.2023
Proposed Reflected ceiling plan – Basement- L (00) 211 - (Roger Mears) - received on 10.05.2023
Proposed Reflected ceiling plan - Ground Floor- L (00) 212- (Roger Mears) - received on 10.05.2023
Proposed Reflected ceiling plan - First Floor- L (00) 213- (Roger Mears) - received on 10.05.2023
Proposed Reflected ceiling plan - Second Floor- L (00) 214- (Roger Mears) - received on 10.05.2023
Proposed Reflected ceiling plan - Third Floor L (00) 215-(Roger Mears) - received on 10.05.2023
Proposed wider site section showing solar panels- L (00) 216- (Roger Mears) - received on 10.05.2023
Fire strategy Proposed Basement Plan L (68.5) 200-(Roger Mears) - received on 10.05.2023
Fire strategy Proposed Ground Floor Plan- L (68.5) 201- (Roger Mears) - received on 10.05.2023
Fire strategy Proposed First Floor Plan- L (68.5) 202- (Roger Mears) - received on 10.05.2023
Fire strategy Proposed Second Floor Plan- L (68.5) 203- (Roger Mears) - received on 10.05.2023
Fire strategy Proposed Third & Fourth floor plan- L (68.5) 204- (Roger Mears) - received on 10.05.2023
Proposed Doors Fire Upgrade L (68.5) 205- (Roger Mears) - received on 10.05.2023
Proposed Doors Fire Upgrade: literature (information only)- L (68.5) 206- (Roger Mears) - received on 10.05.2023
Proposed Basement Plan Sprinklers layout- L (68.5) 207- (Roger Mears) - received on 10.05.2023
Proposed Ground floor plan - sprinklers layout- L (68.5) 208- (Roger Mears) - received on 10.05.2023
Proposed First floor plan - sprinklers layout- L (68.5) 209- (Roger Mears) - received on 10.05.2023
Proposed Second floor plan - sprinklers layout- L (68.5) 210- (Roger Mears) - received on 10.05.2023
Proposed Third & Fourth floor plan- Sprinklers layout- L (68.5) 211- (Roger Mears) - received on 10.05.2023
Proposed services distribution Basement Plan L (62) 200- (Roger Mears) - received on 10.05.2023
Proposed services distribution- Ground floor plan- L (62) 201- (Roger Mears) - received on 10.05.2023
Proposed services distribution First Floor Plan- L (62) 202- (Roger Mears) - received on 10.05.2023
Proposed services distribution Second Floor Plan- L (62) 203- (Roger Mears) - received on 10.05.2023
Proposed services distribution Third and Fourth floor L (62) 204- (Roger Mears) - received on 10.05.2023
Block L GA Elevations- South East Elevation, North East Elevation- BA9691-2513-(PRP) - received on 10.05.2023

Block L GA Elevations- South West Elevation, North West Elevation- BA9691-2514- (PRP) - received on 10.05.2023
Typical Substation- BA9691-2420- (PRP) - received on 10.05.2023
Gate House (Existing & Demolition)- GA Plans and Elevations- BA9691-2410-(PRP) - received on 10.05.2023
Gate House (Proposed)- GA Plans and Elevations- BA9691-2411- (PRP) - received on 10.05.2023
First Floor- Internal room elevations F11- L (00) 311- (Roger Mears) - received on 10.05.2023
First Floor- Room elevations- F13-14- L (00) 312-(Roger Mears) - received on 10.05.2023
First Floor- Internal room elevations- F15- L (00) 313-(Roger Mears) - received on 10.05.2023
First Floor Internal room elevations- F16 & F17- L (00) 314- (Roger Mears) - received on 10.05.2023
Room S3- L (00) 315-(Roger Mears) - received on 10.05.2023- (Roger Mears) - received on 10.05.2023
Second Floor- Internal room elevations- S07 & S08- L (00) 316- (Roger Mears) - received on 10.05.2023
Second Floor- Internal room elevations- S11 & S12- L (00) 317- (Roger Mears) - received on 10.05.2023
Second Floor- Internal room elevations- S15 & S16- L (00) 318- (Roger Mears) - received on 10.05.2023
Third Floor- Internal room elevations T03- L (00) 319-(Roger Mears) - received on 10.05.2023
Third Floor- Internal room elevations T04- L (00) 320- (Roger Mears) - received on 10.05.2023
Third Floor Internal room elevations T05- L (00) 321-(Roger Mears) - received on 10.05.2023
Third Floor- Internal room elevations T06- L (00) 322- (Roger Mears) - received on 10.05.2023
Third Floor- Internal room elevations T08- L (00) 323- (Roger Mears) - received on 10.05.2023
Proposed reinstatement Gable Roof & Cupola- A (00) 200- (Roger Mears) - received on 10.05.2023
Proposed reinstatement Porch entrance- A (00) 201- (Roger Mears) - received on 10.05.2023
Proposed reinstatement New window (North side)- A (00) 202- (Roger Mears) - received on 10.05.2023
Proposed reinstatement New window (East side)- A (00) 203- (Roger Mears) - received on 10.05.2023
Proposed reinstatement Edge Wall (West side)- A (00) 204- (Roger Mears) - received on 10.05.2023
Block F GA Elevations South Elevation, West Elevation- BA9691-2352-(PRP) - received on 10.05.2023
Block F GA Elevations- North West, North East, East Elevation- BA9691-2353-(PRP) - received on 10.05.2023
Block F GA Elevations- Internal East, North, South Elevation BA9691-2354-(PRP) - received on 10.05.2023

Block C GA Elevations- North East Elevation, South East Elevation- BA9691-2323-(PRP) - received on 10.05.2023
Block E GA Elevations- South Elevation, West Elevation- BA9691-2345-(PRP) - received on 10.05.2023
Block D GA Elevations North West Elevation, North East Elevation- BA9691-2333- (PRP) - received on 10.05.2023
Block G- South West Elevation, North West Elevation BA9691-2365- (PRP) - received on 10.05.2023
Block H-J GA Elevations- Internal Courtyard BA9691-2378- (PRP) - received on 10.05.2023
Block I GA Elevations- North East Elevation, South East Elevation- BA9691-2384(PRP) - received on 10.05.2023
Block I GA Elevations- South West Elevation, North West Elevation- BA9691-2385 (PRP) - received on 10.05.2023
Block K Elevations- North East Elevation, South East Elevation- BA9691-2502 (PRP) - received on 10.05.2023
Block K Elevations- South West Elevation, North West Elevation- BA9691-2503(PRP) - received on 10.05.2023
Proposed Basement Plan- L (00) 200 (Roger Mears) - received on 10.05.2023
Ground Floor Internal room elevations G01-G02- L (00) 300(Roger Mears) - received on 10.05.2023
Ground Floor Internal room elevations G06- L (00) 301 (Roger Mears) - received on 10.05.2023
Ground Floor Internal room elevations G10 L (00) 305(Roger Mears) - received on 10.05.2023
Ground Floor- Internal room elevations G13- L (00) 307 (Roger Mears) - received on 10.05.2023
Proposed Panel radiator- C(56)001(Roger Mears) - received on 10.05.2023
Proposed ventilation grille- C (57) 001(Roger Mears) - received on 10.05.2023
Roof detail- C (27) 010 (Roger Mears) - received on 10.05.2023
Window details without shutters - C (31.4) 001 (Roger Mears) - received on 10.05.2023
Typical window detail with shutters- C (31.4) 002 (Roger Mears) - received on 10.05.2023
South Elevation- Proposed new doors to rear Terrace C (31.4) 020- (Roger Mears) - received on 10.05.2023
Secondary glazing details C (31.4) 030-(Roger Mears) - received on 10.05.2023
Parking Allocation Plan- BA9691-2063- Rev C (PRP) received on 16.11.2023
Density Calculation over Residential Gross Developable Area - BA9691-2060 Rev B (PRP) received on 27.10.2023
Residential Area Measure - DE 499_PL_214 (Define) received on 07.08.2023
Separation Distances Sheet 1 - BA9691-2070 Rev –(PRP)- received on 27.08.2023
Separation Distances Sheet 2- BA9691-2071 Rev –(PRP) received on 27.08.2023
Separation Distances Sheet 3- BA9691-2072 Rev – (PRP) received on 27.08.2023
Existing and Proposed Sections – Section AA- BA9691- 2106- (PRP) received on 19.09.2023

Existing and Proposed Sections – Section BB - BA9691- 2107 (PRP) received on 19.09.2023
Block D First and Ground Floor Plan Surveillance Diagram- BA9691- SK2700 (PRP) received on 19.09.2023
Block E Ground Floor Plan Surveillance Diagram - BA9691- SK2701 (PRP) received on 19.09.2023
Block E First Floor Plan Surveillance Diagram- BA9691- SK2702 (PRP) received on 19.09.2023
Amended fences markup (PRP) received on 27.09.2023
Previously Developed Area Measure- DE 499_PL_217 (Define) received on 14.11.2023
Red and Green Zones – Area calculation- BA9691-SK023- Rev C (PRP) received on 14.11.2023
Boundary to Caenwood Close- DE 499_PL_218 (Define) received on 15.11.2023

Reason: To ensure that the development is carried out in a satisfactory manner.

3 Materials samples
No development shall take place above slab level on each relevant phase until samples of the materials of the approved materials to be used on the external faces and roof of the buildings have been submitted to and approved in writing by the borough council. Samples to be cross referenced to the approved drawings. Development shall be carried out in accordance with the approved details.

Reason: To ensure that a satisfactory external appearance is achieved of the development in accordance with policy DM2 of the Elmbridge Development Management Plan. It is considered necessary for this to be a pre-commencement condition because the use of satisfactory external materials goes to the heart of the planning permission.

4 Phasing Plan
The development shall proceed in accordance with a phasing plan which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement. The Phasing Plan shall include details of the maximum number of dwellings and other development to be implemented within each phase of the development. The development shall only be implemented in accordance with the approved Phasing Plan. This Phasing Plan shall not be amended without the written consent of the Local Planning Authority.

Reason: To ensure the satisfactory phasing of the development.

5 SuDs - Design Details
Each phase of the development hereby permitted shall not commence until details of the design of a surface water drainage scheme relating to the same phase have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with

the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:
a) The results of soakaway location specific infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.
b) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+45% allowance for climate change) storm events and 10% allowance for urban creep (for the residential phases of the site only), during all stages of the development. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate as detailed in Curtins Surface Water Drainage Response 22/08/2023, reference: 081271- CUR-XX-XX-T-C-00001, including the proposed sustainable drainage measures.
c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.). Confirmation is required of a 1m unsaturated zone from the base of any proposed soakaway to the seasonal high groundwater level and confirmation of half-drain times.
d) Evidence that any existing on-site drainage and soakaways proposed for re-use are fit for purpose.
e) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.
f) Details of drainage management responsibilities and maintenance regimes for the drainage system.
g) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

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

6 Remediation Strategy
No development, within a relevant phase, approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

1. A further site investigation scheme, based on the Phase II report (April 2023) to provide information for a detailed (hydrogeological) assessment of the risk to all receptors that may be affected, including those off-site. We will need to review and approve a scope of works ahead of their commencement. This scope shall include groundwater monitoring throughout and following all groundworks, including piling and have sufficient spatial and depth coverage. In addition to ammoniacal nitrogen, nitrate/total oxidised N are required to be analysed. A minimum of 2 rounds of analysis for PFAS shall also be

undertaken, and based on the results, appropriate measures must be proposed in the revised Remediation Strategy (below).

2. The results of the site investigation and the detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of wat

7 Potential Land Contamination

To ensure the potential for contamination has been investigated and the necessary action taken to make the development site suitable for its proposed use, the following steps must be completed to the satisfaction of the Council. No construction shall be commenced on a phase until step (a) has been completed for that phase by a competent person. Furthermore, there shall be no occupation of a relevant phase by any end user prior to meeting the terms of this condition in full.

a) Gas Design report and Materials Management Plan

A written Gas Design report as referred to in the Remediation Strategy (Soiltechnics Ltd, August 2023, ref STU5668-R02 Rev E) shall be submitted to, and approved by, the Council. Where appropriate, a Materials Management Plan approved by a Qualified Person in accordance with the CL:AIRE Definition of Waste: Development Industry Code of Practice (DoWCoP), shall also be submitted.

b) Development in accordance with the Remediation Strategy

The development of the site shall be carried out in accordance with the approved Remediation Strategy (Soiltechnics Ltd, August 2023, ref STU5668-R02 Rev E) and any addenda submitted by the developer and agreed in writing by the Borough Council. Any post remediation monitoring identified in the Remediation Strategy, shall be installed by the developer within the timescales identified in the Remediation Strategy and maintained and operated for as long as identified by the Remediation Strategy.

c) Unsuspected Contamination

If, during development, contamination not previously identified, is found to be present at the site then no further development shall be carried out until the developer has submitted, and had approved by the Council, a written addendum to the Remediation Strategy detailing how the unsuspected

contamination shall be dealt with. Written confirmation that unsuspected contamination has been appropriately dealt with shall be dealt with. Written confirmation that unsuspected contamination has been appropriately dealt with shall be provided to the Council as part of step (g).

c) Piling
Development of a relevant phase approved by this permission shall not commence unless a Foundation Works Risk Assessment for piling foundations (if piling is to be used on site) has been submitted to, and agreed in writing, by the Borough Council. The piling shall be undertaken only in accordance with the method outlined in the approved Foundation Works Risk Assessment.

e) Imported material
Clean, uncontaminated rock, soil, brick rubble, crushed concrete or ceramic only shall be permitted as infill material. The developer shall not import any material until a sampling program, including appropriate import criteria for the proposed end use and frequency of sampling, has been submitted in writing, and approved by, the Council. The Developer shall carry out the approved sampling program to check that all imported material conforms to the agreed criteria. Where the permitted end use is residential, the sampling program shall also include samples taken from the imported material after final placement. Written confirmation of the suitability of all imported materials shall be provided to the Council as part of step (g). This shall include both the results of the sampling program and also details of the origin, transport, final deposition and any temporary stockpiling of the imported materials.

f) Underground Services
Ground conditions may be unsuitable for underground services, in particular the potable water supply. The developer must either demonstrate that ground conditions have been considered and are suitable for the underground services to be installed in accordance with current guidance, including written confirmation from the utility supplier, or alternatively, the developer must provide sufficient evidence that the underground services are adequately protected for the ground conditions present. In the case of the potable water supply this may include appropriate installation of suitable barrier pipes. Prior to occupation of a relevant phase by any end user, written confirmation that underground services are appropriate for the site shall be provided to the Council as part of step (g).

g) Completion of Remediation and Verification Report

Note: Verification by an independent, competent person must be carried out prior to occupation of any part of the site by any end user. It is recognised that in some large scale developments, defined areas will be phased to enable part site occupation prior to completion of the entire site. Where this approach has been implemented separate verification reports for each phase must be prepared and submitted to the Council for written approval prior to occupation of the defined area by any end user.

Upon completion of the remediation of a relevant phase detailed in the Remediation Strategy, and before occupation by any end user (see note above), a written Verification Report shall be submitted to, and agreed in writing by, the Council providing verification that the required works regarding decontamination and installation of post remediation monitoring, have been carried out in accordance with the agreed Remediation Strategy and any addenda thereto. The verification report shall also provide confirmation and evidence that all other parts of this condition have been met. The verification shall be carried out and reported by an independent, competent person, stating that remediation was carried out in accordance with the approved remediation scheme and that the site is suitable for the permitted end use.

Reason: To avoid adverse effects from pollution on the environment, harm to human health or general amenity, in accordance with the National Planning Policy Framework. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.

8 Previously unidentified contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 174 of the National Planning Policy Framework.

9 Archaeology - Written Scheme of Investigation

No development shall take place in any phase until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work, for that phase to be conducted in accordance with a written scheme of investigation which has been submitted to and approved, in writing, by the Local Planning Authority.

Reason: The site lies in an area of archaeological potential remains. The potential impacts of the development can be mitigated through a programme of archaeological work in accordance with policy DM12 of the Elmbridge Development Management Plan 2015. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.

10 Provision of Electric Charging Points

Prior to the commencement of any development of a relevant phase hereby permitted a plan detailing the amount of EV charging points in the car parks shall be submitted and approved by the Local Planning Authority. The

provision of charging should be in line with Surrey County Council Vehicle and Cycle Parking Guidance (January 2018).

Reason: To sustain compliance with and contribute towards EU limit values or national objectives for pollutants in accordance with paragraph 186 of the National Planning Policy Framework.

11 Vibration

The proposed development shall be subject to a vibration impact assessment from the railway prior to commencement of the development of a relevant phase. Any vibration within the adjoining residential or commercial premises, should not exceed the base line curves identified within BS 6472 which identify vibration magnitudes below which adverse comments or complaints are rare. Any vibration should therefore not exceed the levels set out in the table below:

Type of Receptor	16 Hour VDV (07:00 to 23:00) (ms-1.75)	8 Hour VDV (23:00 to 07:00) (ms – 1.75)
Residential	0.4	0.13
Office or other sensitive non-residential	0.4	0.19

The report should include details of the recommended remedial measures should vibration levels be above these levels. This assessment shall be supplied to the Local Planning Authority prior to the commencement of development. The assessment shall be carried out in accordance with the method rating system as detailed in BS 6472:1992, and the raw data gathered shall be presented as an appendix to such an assessment.
Immediately upon completion of the development there shall be an assessment of the vibration levels to ensure compliance with the above condition. The results of the assessment shall be submitted in writing to the Local Planning Authority.

Reason: To avoid adverse impacts on health and quality of life from noise in accordance with paragraph 123 of the National Planning Policy Framework and the Noise Policy Statement for England. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.

12 Construction Environmental Management Plan (CEMP)

The development herby permitted shall not commence, including any demolition until a CEMP has been submitted and approved in writing by the Local Authority.
The CEMP should include, but not be limited to:

1. Updated Ecological Walkover
2. Map showing the location of the ecological features, specifically the watercourse
3. Risk assessment of the potentially damaging construction activities.

4. Practical measures to avoid and reduce impacts during construction.
5. Location and timing of works to avoid harm to biodiversity features.
6. Responsible persons and lines of communication.
7. Use of protective fencing, exclusion barriers and warning signs where necessary.
8. Clarification of the mitigation and compensation Strategy for bats including measures for long-term security of existing and newly created roosts.
9. Measures to ensure bats are protected on site on buildings where roosts have not currently been identified.
10. Timetable for the implementation of mitigation and compensation including post development monitoring works.
The CEMP must additionally incorporate the recommendations for bats, birds, other species and invasive species. The development must be carried out in accordance with the approved details.

Reason: To ensure that the development does not result in any adverse impact upon protected species or biodiversity in accordance with Policy CS15 of the Core Strategy 2011, Policy DM21 of the Development Management Plan 2015 and the National Planning Policy Framework 2023.

13 Construction Management Plan
No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. The plan shall detail how the demolition/construction activities shall take place to ensure the safe continuing operation of the college. Only the approved details shall be implemented during the construction of the development.

Reason: Required in order that the development should not prejudice highway safety nor cause inconvenience to the public.

14 Construction Transport Management Plan
No development shall commence until a Construction Transport Management Plan, to include
details of:
(a) parking for vehicles of site personnel, operatives and visitors
(b) loading and unloading of plant and materials
(c) storage of plant and materials
(d) programme of works
(e) provision of boundary hoarding behind any visibility zones
(f) HGV deliveries and hours of operation
(g) vehicle routing
(h) measures to prevent the deposit of materials on the highway
(i) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused directly by Site Construction Vehicles
(j) No HGV movements to and from the site shall take place between the hours of 8.00 and 9.00
am and 5.00 and 6.00pm nor shall the contractor permit any HGVs associated with the development at the site to be laid up, waiting, in Heath Road, Old Heath Rd or Brooklands Lane during these times

(k) on-site turning for construction vehicles has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reason: This condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users, in accordance with Policy DM6 of the Elmbridge Development Management Plan 2015 and Policy CS25 of the Elmbridge Core Strategy 2011.

15 Tree pre-commencement meeting (additional arboricultural information)
No development including groundworks and demolition shall take place and no equipment, machinery or materials shall be brought onto the site for the purposes of the development until a pre-commencement meeting has been held on site and attended by a suitable qualified arboriculturist, representative from the Local Planning Authority and the site manager/foreman. The site visit is required to ensure operatives are aware of the agreed working procedures and the precise position of the approved tree protection measures or/and that all tree protection measures have been installed in accordance with all documentation submitted and approved to comply with the Additional Arboricultural Information condition. To arrange a pre-commencement meeting please email tplan@elmbridge.gov.uk with the application reference and contact details.

Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14 of the Core Strategy 2011, and DM6 of the Development Management Plan 2015. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.

16 Tree protection measures (with pre-commencement meeting)
After the agreed tree protection measures have been installed in accordance with the approved plans, all tree protection measures shall be maintained for the course of the development works. The development thereafter shall be implemented in strict accordance with all documentation submitted and approved to comply with the Additional Arboricultural Information condition.

Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14 of the Councils Core Strategy 2011, and DM6 of the Councils Development Management Plan 2015.

17 Additional arboricultural information
No development including groundworks and demolition shall take place until all supporting arboricultural information has been submitted to and approved in writing by the Local Planning Authority. This shall include details of the:

a) existing trees and hedges to be retained in the form of a Tree Survey and Arboricultural Impact Assessment, in line with BS5837:2012;
b) measures taken to protect existing trees and hedges during construction, demolition, delivery / storage of materials and machinery, including a Tree Protection Plan;
c) location and installation of services/utilities/drainage/soakaways, including services to automated gates and how they can be installed in an arboriculturally sensitive manner to limit the impact to retained trees.
d) methods of demolition within root protection area (RPA as defined in BS 5837: 2012) of retained trees.
e) details of construction and installations including methodologies within a root protection area or that may impact on retained trees.
f) full specification for the construction of any roads, parking areas, driveways, hard surfacing, including details of no dig specification and extent of the areas to be constructed using no dig surfacing.
g) detailed levels and cross sections to show that the raised levels of surfacing, where the installation on no dig surfacing within root protection area is proposed, demonstrating that they can be accommodated.
h) all arboricultural site monitoring and supervision required for the duration of the development.
i) methods to improve the rooting environment for retained and proposed trees and landscaping.
j) foundations designs and any other proposals involving below ground excavation inside root protection areas or that may impact on root protection areas.
The development thereafter shall be implemented in strict accordance with the approved details.

Reason: To protect and enhance the appearance and character of the site locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14, CS15 of the Councils Core Strategy 2011, and DM6 of Councils Development Management Plan 2015. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.

18 Tree retention
All existing trees, hedges or hedgerows inside the identified site boundary shall be retained, unless shown on the approved drawings as being removed and the paragraph below shall have effect until the expiration of 5 years from the first occupation of the proposed development.
No retained tree, hedge or hedgerow shall be cut down, uprooted or destroyed, other than in accordance with the approved plans and particulars. If any retained tree, hedge or hedgerow is removed, uprooted or destroyed or dies, another tree, hedge or hedgerow of similar size and species shall be planted at the same place, in the next available planting season or sooner.

Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning

Act 1990, and in accordance with policies CS14, CS15, of the Councils Core Strategy 2011 and DM6 of the Councils Development Management Plan 2015.

19 Tree planting and maintenance

No development including groundworks and demolition shall take place until full details of all proposed tree planting shall be submitted to and approved in writing by the Local Planning Authority. Details are to include:

a) Names and species of the trees to be planted.
b) Nursery sizes of the trees to be planted and whether they will be containerised of bare root.
c) Locations of the trees on a scaled plan.
d) Planting pit design including tree supports, tree guards and any other protective measures to be used.
e) Details shall also include what time of the year the trees shall be planted.
f) Details on the provision of suitable soil volumes to ensure newly planted trees can be sustained to maturity. Special consideration should be given for trees being planting in hard surfaced areas.
g) Tree maintenance schedules for aftercare to ensure good establishment.

All tree planting shall be carried out in accordance with BS 8545:2014. If within a period of 5 years from the date of the planting of any tree, that tree, or any planted in replacement for it, is removed, uprooted or destroyed or dies, another tree of same size and species shall be planted at the same place, in the next available planting season or sooner. The development shall be completed in accordance with the approved details.

Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14, CS15, of the Councils Core Strategy 2011 and DM6 of the Councils Development Management Plan 2015. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.

20 Site Waste Management Plan

Prior to commencement of a relevant phase of the development hereby approved, a Site Waste Management Plan shall be submitted to and approved in writing by the local planning authority. The Site Waste Management Plan shall demonstrate that Construction, Demolition, and Excavation (CD&E) waste generated as a result of the development is limited to the minimum quantity necessary; and opportunities for re-use and recycling of CD&E waste is maximised in accordance with Policy 4 of the Surrey Waste Local Plan 2019 and to comply with the terms of the application.

Reason: This is required to be a pre-commencement condition as the details go to the heart of the planning permission.

21 Reasonable Avoidance Measures for great crested newts

No development of a relevant phase shall take place until Reasonable Avoidance Measures for great crested newts written by a suitably qualified ecologist has been submitted to and approved by the Local Planning Authority.

Reason: To minimise the impacts of development on biodiversity, in accordance with Policy CS15 - Biodiversity and paragraphs 174 and 180 of the NPPF. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.

22 Bat Surveys and Mitigation

No development shall take place until further bat presence/likely absence/roost characterisation surveys for all buildings on-site that will be impacted are carried out to inform a detailed impact assessment mitigation, enhancement, and compensation strategy which shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure the protection of protected species and to comply with Policies CS15 of the Core Strategy 2011 and DM21 of the Development Management Plan 2015 and the NPPF. This is required to be a pre-commencement condition as the details go to the heart of the planning permission.

23 Acoustic fence

No development above slab level of a relevant phase shall commence until details of an acoustic fence to the southern boundary with the railway line have been submitted to and approved in writing by the local planning authority. The agreed details shall be installed on the site prior to the first use of the relevant phase and retained and maintained in perpetuity.

Reason: To avoid adverse impacts on health and quality of life from artificial lighting in accordance with paragraph 185 of the National Planning Policy Framework and the Noise Policy Statement for England.

24 Landscaping detailed scheme

Prior to the commencement of any works above slab level of each relevant phase full details of both hard and soft landscaping works shall be submitted to and approved in writing by the local planning authority and these works shall be carried out as approved. This scheme shall include:

a) a statement setting out the design objectives and how these will be delivered

b) earthworks showing existing and proposed finished levels or contours

c) means of enclosure and retaining structures

d) boundary treatment(s)

e) schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate

f) tree species, sizes, locations, planting pit design, supports, and guards or other protective measures

g) vehicle parking layouts

h) other vehicle and pedestrian access and circulation areas
i) hard surfacing materials
j) minor artefacts and structures [e.g. furniture, play equipment, refuse or other storage units, signs, etc.]
k) proposed and existing functional services above and below ground [e.g. drainage, power, communications cables, pipelines etc. indicating alignments, levels, access points, supports as relevant]
l) retained historic or other landscape features and proposals for restoration, where relevant; renewable energy installations where relevant; lighting, floodlighting and CCTV
m) water features
n) an implementation programme, [including phasing of work where relevant].
The landscaping works shall be carried out in accordance with the approved details before the relevant phase of the development is first occupied in accordance with the agreed implementation programme. The completed scheme shall be managed and/or maintained in accordance with an approved scheme of management and/or maintenance.

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

25 Secured by design - prior to above ground works
Prior to any above-ground works of a relevant residential phase of the residential works to the College campus, details of full 'Secured By Design' Accreditation shall be submitted and approved in writing by the Local Planning Authority. The details shall demonstrate consultation with Surrey Police Designing Out Crime Officers and that each building or part of a building can achieve accreditation. The development shall only be carried out in accordance with the approved details and maintained thereafter.

Reason: To ensure safe and secure development and contribute to reducing crime, in accordance with the Elmbridge Local Plan and the NPPF.

26 SuDs - Verification Report
Prior to the first occupation of each phase 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 designed to the national technical standards for SuDS and to comply with policy CS26 of the Elmbridge Core Strategy, Flood Risk Supplementary Planning Document and the National Planning Policy Framework.

27 Foul Water Network Upgrade

The development shall not be occupied until confirmation has been provided that either:-

1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or-

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

Reason: Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.

28 Verification Report

Prior to any part of the permitted development being brought into use within a relevant phase, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: To ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 174 of the National Planning Policy Framework.

29 Borehole decommissioning

A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part phase of the permitted development.

Reason: The submitted planning application indicates that boreholes will need to be installed at the development site to investigate groundwater resources. If these boreholes are not decommissioned correctly, they can provide preferential pathways for contaminant movement which poses a risk to groundwater quality. Groundwater is particularly sensitive in this location because the proposed development site is on a secondary A aquifer. This condition seeks to ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 174 of the National Planning Policy Framework and Position

Statement A of The Environment Agency's approach to groundwater protection (publishing.service.gov.uk).

30 BS8233:2014 Guidance on sound insulation and noise reduction for buildings

Prior to first occupation of each relevant phase, the noise report within the Brooklands College - Environmental Statement, Chapter 1 Noise Report (April 2023), approved by the Local Planning Authority in relation to BS8233 assessment shall be fully implemented in accordance with the approved details. The works and scheme shall thereafter be retained, in accordance with the approved details for the lifetime of the development. Before first occupation, post-completion testing shall be carried out to ensure that the sound insulation values have been achieved. This shall be carried out by a suitably qualified person and the results of the assessment shall be submitted to and approved in writing, by the Local Planning Authority.

Reason: To avoid adverse impacts on health and quality of life from noise in accordance with paragraph 180 of the National Planning Policy Framework and the Noise Policy Statement for England.

31 Noise from Plant and Machinery

Before any fixed plant, machinery, air-moving extraction or filtration, air-conditioning units or like-kind are installed within the premises in a relevant phase, a noise assessment shall be carried out in accordance with the criteria set out in BS4142:2019. A detailed noise assessment report identifying required mitigation measures shall be submitted to and approved in writing by the Local Planning Authority. The approved works and scheme hereby approved shall be implemented as approved and thereafter maintained in accordance with that approval. The assessment must be carried out by a suitably qualified acoustic consultant/engineer and be in accordance with BS4142: 2019 - Methods for rating and assessing industrial and commercial sound.

Reason: To avoid adverse impacts on health and quality of life from noise in accordance with paragraph 180 of the National Planning Policy Framework and the Noise Policy Statement for England.

32 Lighting

Prior to the installation of any artificial lighting within a relevant phase, a lighting scheme shall be submitted to the Local Planning Authority and approved in writing. The lighting scheme for that phase shall identify how the installation of any new/additional artificial lighting is orientated and shielded or otherwise designed and positioned, such that the light from them does not cause light nuisance to habitable rooms within the development or other residential properties in the near vicinity. The lighting scheme shall refer to national guidance and identify the type of lighting to be installed, height of any columns, any shielding and lux mapping showing light spillage levels received at ground level around the development and shall thereafter be retained and maintained in accordance with the approved details.

Reason: To avoid adverse impacts on health and quality of life from light pollution in accordance with paragraph 185 of the National Planning Policy Framework for the avoidance of nuisance .

33 Community Use Agreement

Use of the development shall not commence until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the 4no. court sports hall and include details of pricing policy, hours of use, access by non-educational establishment, management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement.

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

34 Secured by design - prior to first occupation

Prior to the first occupation of each building or part of a building or use of the residential element of the development, a 'Secured By
Design' accreditation shall be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.

Reason: To ensure safe and secure development and contribute to reducing crime, in accordance with the Elmbridge Local Plan and the NPPF.

35 Bus stop improvements

Prior to the occupation of the first residential dwelling, a scheme to improve the existing southbound bus stop on Heath Road shall be provided. The scheme shall include an increased shelter size and "bus cage" markings as well as an uncontrolled pedestrian crossing point with tactile paving and will be implemented by the developer via a Section 278 Agreement with the CHA under The Highways Act 1980. The proposed improvement will be subject to relevant design and safety checking by the CHA at the developers' expense.

Reason: This condition is required in recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2023 and Policy CS25 of the Elmbridge Core Strategy 2011.

36 Car Club

Prior to the occupation of the first residential dwelling, a scheme to provide a 'Car Club' shall be provided at the developers' expense. The Car Club shall include the following minimum provision.

- A Car Club for two cars with dedicated Ultra Low Emission Vehicle bays within the site
- Appropriate charging points for Ultra Low Vehicle Usage
- Residents to be provided with 3-year free membership and £50 free drive time

- Car Club to be supported by the developer for a minimum of 3 years

Reason: This condition is required in recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2023 and Policy CS25 of the Elmbridge Core Strategy 2011.

37 Travel Plan (residential element)
Prior to the occupation of the, first residential dwelling, a Travel Plan for the residential element of the development shall be agreed with the Local Planning Authority in accordance with the sustainable development aims and objectives of the National Planning Policy Framework and Surrey County Council's "Travel Plans Good Practice Guide". Then the approved Travel Plans shall be implemented and thereafter maintained and developed to the satisfaction of the Local Planning Authority. Appropriate targets and monitoring will be agreed and CHA Travel Plan checking fees provided at the developer's expense.

Reason: This condition is required in recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2023 and Policy CS25 of the Elmbridge Core Strategy 2011.

38 Travel Plan (college element)
Prior to the occupation of the first new build element of the college proposals a Travel Plan for the college element of the development shall be agreed with the Local Planning Authority in accordance with the sustainable development aims and objectives of the National Planning Policy Framework and Surrey County Council's "Travel Plans Good Practice Guide". Then the approved Travel Plans shall be implemented and thereafter maintained and developed to the satisfaction of the Local Planning Authority. Appropriate targets and monitoring will be agreed and CHA Travel Plan checking fees provided at the developer's expense. The College Travel Plan will include and oversee a permit system for management of the on-site car parking spaces.

Reason: This condition is required in recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2023 and Policy CS25 of the Elmbridge Core Strategy 2011.

39 EV charging (residential)
Each residential unit hereby approved shall not be occupied unless and until its associated residential car parking space (up to a standard of 1 per dwelling) is 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) in accordance with the approved plans and thereafter retained and maintained to the satisfaction of the Local Planning Authority. It should be noted that where basement charging points are proposed, these will need to be agreed with the local fire authority.

Reason: This condition is required in recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2023 and Policy CS25 of the Elmbridge Core Strategy 2011.

40 EV charging (college)
The Brooklands college car parking hereby approved shall not come into use unless and until at least 20% of the Brooklands College car parking spaces are provided with a fast-charge Electric Vehicle charging point (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) in accordance with the approved plans and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

Reason: This condition is required in recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2023 and Policy CS25 of the Elmbridge Core Strategy 2011.

41 Parking and cycles
The development hereby approved shall not be fully occupied unless and until space has been laid out within the site in accordance with the approved plans for vehicles and cycles to be parked and for vehicles to turn around within the site. For the avoidance of doubt, in respect of College parking this will be 164 car parking spaces and 224 cycle spaces . Notwithstanding the above, car and cycle parking provision will be regularly reviewed as part of respective ongoing Travel Plans. Thereafter the parking and turning areas shall be retained and maintained for their designated purposes.

Reason: This condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users, in accordance with Policy DM6 of the Elmbridge Development Management Plan 2015 and Policy CS25 of the Elmbridge Core Strategy 2011.

42 Waste Management Plan
Prior to the occupation of any relevant phase of the development, the applicant shall submit a refuse management plan to the Local Planning Authority detailing how refuse management and collection will be controlled for both the residential and college elements of the development . The plan shall then be implemented in accordance with the approved details in perpetuity.

Reason: The condition is required in order for the proposal to meet the requirements of policy DM8 of the Development Management Plan 2015.

43 SANG Car Park
Notwithstanding the approved plans, details of the proposed SANG car park shall be submitted to and approved in writing by the Local Planning Authority, and also implemented, prior to first occupation of the residential element of the development. The car park shall be retained in perpetuity in accordance with the approved plans.

Reason: In order to comply with Natural England's criteria for designation of SANG and Policy CS13 of the Core Strategy 2011.

44 Woodland Management Strategy

Prior to first occupation of any part of the residential element, a woodland management strategy have been submitted to and approved in writing by the local authority. Details must include long term objectives of at least 20 years, management responsibilities, restoration and enhancement measures, and invasive plant species eradication / preventative measures (as set in the Wildlife and Countryside Act 1981 (as Amended)) for all woodland sites. The woodland management thereafter shall be implemented in strict accordance with the approved details unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure the provision, establishment and maintenance of an appropriate woodland management scheme, protect and enhance the site and in accordance with Policies CS14, CS15 of the Core Strategy 2011 and Policies DM6 and DM21 of the Development Management Plan 2015.

45 Pedestrian and cycle links

Prior to the occupation of the 50th residential dwelling, the developer will construct a route or routes within the site to provide pedestrian and cycle links to connect between the railway bridge to the south of the site and Heath Road to the east of the site, in accordance with plans to be approved by the Local Planning Authority. The above route/s will be constructed to CHA adoptable standards and appropriate Agreements entered with the CHA to ensure that the route/s is/are dedicated for unrestricted public use in perpetuity.

Reason: This condition is required in recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2023 and Policy CS25 of the Elmbridge Core Strategy 2011.

46 Hours of use

The college site shall not be used outside the hours of 08:00 and 22:00, unless required in exceptional circumstances. In such case agreement must be sought in writing from the Local Planning Authority and notification to adjoining properties must be carried out giving reasonable notice by the college.

Reason: To protect the amenities of neighbouring occupiers in accordance with Policy DM2 of the Elmbridge Development Management Plan 2015.

47 Hours of deliveries

No deliveries relating to the operation of the college shall be made outside of the hours of 0700 and 1800 (2100 on Wednesdays) and at no time on Sundays, bank or public holidays and deliveries to the whole site should be in accordance with the Delivery and Servicing Management Plan - Appendix G4 dated April 2023.

Reason: To protect the amenities of neighbouring occupiers in accordance with Policy DM2 and DM5 of the Elmbridge Development Management Plan 2015.

48 Site supervision (additional arboricultural information)
The completion schedule/report of all arboricultural site supervision and monitoring submitted and approved in compliance with the Additional Arboricultural Information condition, shall be submitted to and approved in writing by the Local Planning Authority within 20 working days of the substantial completion of the development hereby approved. This shall include evidence of compliance through supervision and monitoring of the agreed activities by a suitably qualified arboriculturist.

Reason: To protect and enhance the appearance and character of the site and locality, reduce the risk to protected and retained trees in accordance with the approved details pursuant to section 197 of the Town and Country Planning Act 1990, and in accordance with policies CS14 of the Councils Core Strategy 2011, and DM6 of the Councils Development Management Plan 2015.

49 Infiltration
No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be submitted prior to the commencement of development and be supported by a technical proposal and design specification and a hydrogeological assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: The previous use of the proposed development site as landfill areas presents a medium risk of contamination that could be mobilised by surface water infiltration from the proposed sustainable drainage system (SuDS). This could pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a secondary aquifer A. This condition seeks to ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 174 of the National Planning Policy Framework.

50 Piling
Piling and/or other foundation techniques using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details. Where any piling is proposed, A piling risk assessment in the context of the hydrogeological assessment is required, with details of groundwater monitoring to be performed. The piling risk assessment must be agreed with the local planning authority prior to commencement of any piling within that phase.

Reason: Piling and/or other foundation techniques using penetrative methods can result in risks to potable supplies from, for example, pollution/turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Groundwater is particularly sensitive in this location because the proposed development site is on two historic landfill sites, and

upon a superficial secondary aquifer A which is in hydraulic continuity with a bedrock secondary aquifer A. This condition seeks to ensure that the proposed foundations do not harm groundwater resources in line with paragraph 174 of the National Planning Policy Framework.

51 PD limitation

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking or re-enacting that order) no development falling within Part 1 classes A, AA, B, D, E and Part 2 class A of schedule 2 to the said order shall be carried out within the curtilage of any dwellinghouse, unless planning permission is first granted by the borough council.

Reason: To safeguard the character and amenities of the premises and adjoining properties and to comply with policy DM2 of the Elmbridge Development Management Plan.

52 Obscure glazing

Prior to any above ground works of the residential elements of the development hereby permitted a plan shall be submitted to and approved in writing the Local Planning Authority showing which properties will include obscure glazed windows to prevent harmful overlooking. Windows shall be glazed with obscure glass that accords with level three obscurity as shown on the pilkington textured glass privacy levels (other glass suppliers are available) and only openable above a height of 1.7m above the internal floor level of the room to which it serves. The window shall be permanently retained in that condition thereafter.

Reason: To preserve the reasonable privacy of neighbouring residents in accordance with policy DM2 of the Elmbridge Development Management Plan.

53 Balcony screen

Prior to any above ground works of the residential elements of the development hereby permitted a plan shall be submitted to and approved in writing the Local Planning Authority showing which properties will include balcony screen to prevent harmful overlooking. Once approved the screens shall be maintained permanently in strict accordance with the approved plans.

Reason: To preserve the privacy of neighbouring residents in accordance with policy DM2 of the Elmbridge Development Management Plan.

Informatives

1 Community Infrastructure Levy (CIL)

The development permitted is subject to a CIL liability for which a Liability Notice will be issued as soon as practical after the day on which planning permission first permits development.

To avoid breaching the CIL regulations and the potential financial penalties involved, it is essential a prior commencement notice be submitted. The notice is available at planningportal.co.uk/cil

For the avoidance of doubt commencement of demolition of existing structure(s) covering any part of the footprint of the proposed structure(s) would be considered as commencement for the purpose of the CIL regulations.

2 SuDs informatives

If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent. More details are available on their website.
If proposed works result in infiltration of surface water to ground within a Source Protection Zone, the Environment Agency will require proof of surface water treatment to achieve water quality standards.
Sub ground structures should be designed so they do not have an adverse effect on groundwater.
If there are any further queries please contact the Flood Risk, Planning, and Consenting Team via SUDS@surreycc.gov.uk. Please use their reference number in any future correspondence.

3 Thames Water Informatives

The developer can request information to support the discharge of the Foul Water Network Upgrade condition by visiting the Thames Water website at thameswater.co.uk/preplanning.
Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then Thames Water would consider this to be a material change to the proposal and would need to review our position.
There are public sewers crossing or close to the development. If significant work is planned near the public sewers, it's important that the risk of damage is minimised. Thames Water will need to check that the development doesn't limit repair or maintenance activities, or inhibit the services they provide in any other way. The applicant is advised to read their guide working near or diverting their pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes
A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water would expect the developer to demonstrate what measures they will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed online via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

4 EA informatives

Waste to be taken off-site - advice for applicant

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:
o Duty of Care Regulations 1991
o Hazardous Waste (England and Wales) Regulations 2005
o Environmental Permitting (England and Wales) Regulations 2016
o The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on GOV.UK for more information.

Permits - advice to applicant and LPA
This development may require an environmental permit under the Environmental Permitting (England and Wales) Regulations 2016, Regulation 12. In circumstances where an activity/operation meets certain criteria, an exemption from permitting may apply. More information on exempt activities can be found here:
https://www.gov.uk/guidance/register-your-waste-exemptions-environmental-permits.
The applicant is advised to find out more information about the permit application process online and to send a pre-application enquiry form via the gov.uk website: https://www.gov.uk/government/publications/environmental-permit-pre-applicationadvice-form.

Other Consents - advice to applicant
As you are aware we also have a regulatory role in issuing legally required consents, permits or licences for various activities. We have not assessed whether consent will be required under our regulatory role and therefore this letter does not indicate that permission will be given by the Environment Agency as a regulatory body.

5 EHO Contaminated Land Informatives
Advice to Developers Regarding Contamination Assessments
Before carrying out any contamination investigation or remediation of a site, the developer is strongly recommended to contact the Environmental Health & Licensing Team for guidance on the requirements for such investigations or remediation. Investigations, in particular, which do not adequately fulfil these recommendations, may result in additional work having to be carried out.

Materials Management

All wastes need to be properly handled and disposed of whilst ensuring strict compliance with all relevant waste management legislation. If waste soils are to be re-used on site then there will need to be an Environmental Permit in place or an Exemption. Or there will need to be a Materials Management Plan approved by a Qualified Person in accordance with the CL:AIRE Definition of Waste: Development Industry Code of Practice (DoWCoP). Any wastes removed from site should be properly loaded onto vehicles operating with an appropriate and valid waste carriers licence and transported to licensed/permitted facilities. Imported materials should be sourced from authorised facilities and comply with relevant permits, exemptions, quality protocols or quality soil frameworks. All details need to be documented in the Site Waste Management Plan and verification reporting. Materials illegally deposited at inappropriate sites or used inappropriately on this site may be subject to relevant taxes, payable by all involved parties. Only robust due diligence is a defence against joint liability. HMRC may pursue any evasion of landfill tax for up to several years after the event. The Environment Agency and the County Council may pursue any breaches of waste management legislation. Materials records and contact documents must therefore be maintained for inspection and audit by enforcing authorities for relevant time periods after the works are completed.

6 EHO (Noise & Pollution) informatives

Construction phase only - Noise and Pollution

To control noise and pollution during the construction phase where sensitive premises are nearby it is advised that:

(a) Work which is audible beyond the site boundary should only be carried out between the following hours:

Monday to Friday 08:00 hrs to 18:00 hrs

Saturday 08:00 hrs to 13:00 hrs

and not at all on Sundays or Bank Holidays.

(b) The quietest available items of plant and machinery should be used on site. Where permanently sited equipment such as generators are necessary, they should be enclosed to reduce noise levels.

(c) Deliveries and collections should only be received within the hours detailed above.

(d) Adequate steps should be taken to prevent dust causing nuisance beyond the site boundary.

These could include the use of hoses to damp down stockpiles of materials which are likely to generate airborne dust, to damp down during stone/slab cutting; and the use of bowsers and wheel washes.

(e) There should be no burning on site that causes nuisance to local residents.

(f) Only minimal security lighting shall be used outside the hours stated above.

7 Network Rail informative

Refer to Asset Protection Informatives for works in close proximity to Network Rail's Infrastructure supplied with their response.

8 Sport England informative

Guidance on preparing Community Use Agreements is available from Sport England. http://www.sportengland.org/planningapplications/ For artificial grass

pitches it is recommended that you seek guidance from the Football Association/England Hockey/Rugby Football Union on pitch construction when determining the community use hours the artificial pitch can accommodate.