

<b>PLANNING OFFICER REPORT</b>
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<b>Application No.</b>	MO/2024/0096 Outline Major
<b>Valid Date:</b>	22-Jan-2024
<b>Applicant:</b>	Thakeham Homes Limited
<b>Case Officer:</b>	Sherelle Munnis
<b>Ward(s):</b>	Bookham West
<b>Proposal:</b>	Outline application with all matters reserved except for means of access for a residential-led mixed use development including the erection of up to 200 No. Dwellings, a community building of up to 929sqm (Use Class E and/or F), gypsy and traveller pitches up to 0.2ha, SANG and public open space, landscaping, surface water drainage and all other associated infrastructure, and the demolition of 330 Lower Road.
<b>Amendments /amplifications:</b>	Amended and additional information received showing relocation of gypsy & traveller pitches and community building, removal of vehicular access from Water Lane, relocation of Locally Equipped Area of Play (LEAP) & SANG car park, amended Parameter Plans showing reconfiguration of residential land parcels and updated building heights, updated SANG circular route, amended Illustrative Masterplan and Heritage Impact Assessment; additional Ecology Information; addendums to - Landscape Assessment; Design and Access Statement; Green Belt Statement; Planning Statement; Arboricultural Impact Assessment; Flood Risk Assessment; Transport Statement; and, Chalk Streams Rebuttal.
<b>Site Location:</b>	Land north of Lower Road and west of Little Bookham Street, Little Bookham, Leatherhead, Surrey

**Committee:** MAJOR DEVELOPMENT

**RECOMMENDATION: A:** Subject to receipt of a satisfactory legal agreement by Wednesday 28<sup>th</sup> March 2025 or any other such date as agreed in writing by the Deputy Chief Executive and Executive Head of Service (Planning and Place), to secure the provision of :

- (1) a country park (SANG) and associated management plan**
- (2) provision of public open space and a Locally Equipped Area of Play (LEAP)**
- (3) 80 on-site affordable housing units**
- (4) Class E/F Community Building**
- (5) a Health Care Contribution of £191,991 to the Integrated Care Board to be used towards the provision of health care facilities within the Leatherhead**

**Primary Care Network or successor body**

**(6) an area of 0.2 hectares for the delivery of Gypsy and Traveller pitches**

**(7) prior to first occupation, provision of 1 electric car club vehicle and 1 electric vehicle parking space within the site. Car club parking space to be provided with a fast charge electric vehicle charging point. The car club to be promoted as part of the sales and marketing of the development. 2 years free membership of car club and a £50 driving credit for all new residents upon each occupation. Vouchers to be offered to multiple residents at the same address.**

**(8) a Travel Plan plus an auditing fee of £6,150 and sustainable travel vouchers for the new residents**

**(9) an indexed-linked sum of £40,000 per annum over a period of five years – a total contribution of £200,000 – to be paid to the County Council for the provision of a weekly Digital Demand Responsive Transport (DDRT) bus service which will include evenings and weekend services**

**\* SCC to provide the Demand Responsive Bus Service using the contributions paid towards it with the service to commence within six months of the first payment**

**\* SCC to monitor the usage of the Demand Responsive Bus Service annually to help inform the routing and timetable of the Bus Service**

**\* SCC to covenant that if the SCC shall not have expended or committed to be spent the Demand Responsive Bus Service Contribution within one calendar year from the date of the last payment made then SCC shall return the contribution sum to the developer**

**\* all financial contributions due to the highway authority to be index linked using the prevailing Retail Price Index (RPIX) from the payment date to the date of any resolution to grant planning consent, and**

**\* all fare box revenue for passengers travelling to/from the housing development for a 5 year period from first provision of the service is to be returned to the developer on an annual basis (i.e. the developer takes on the risk of the revenue element of funding the service)**

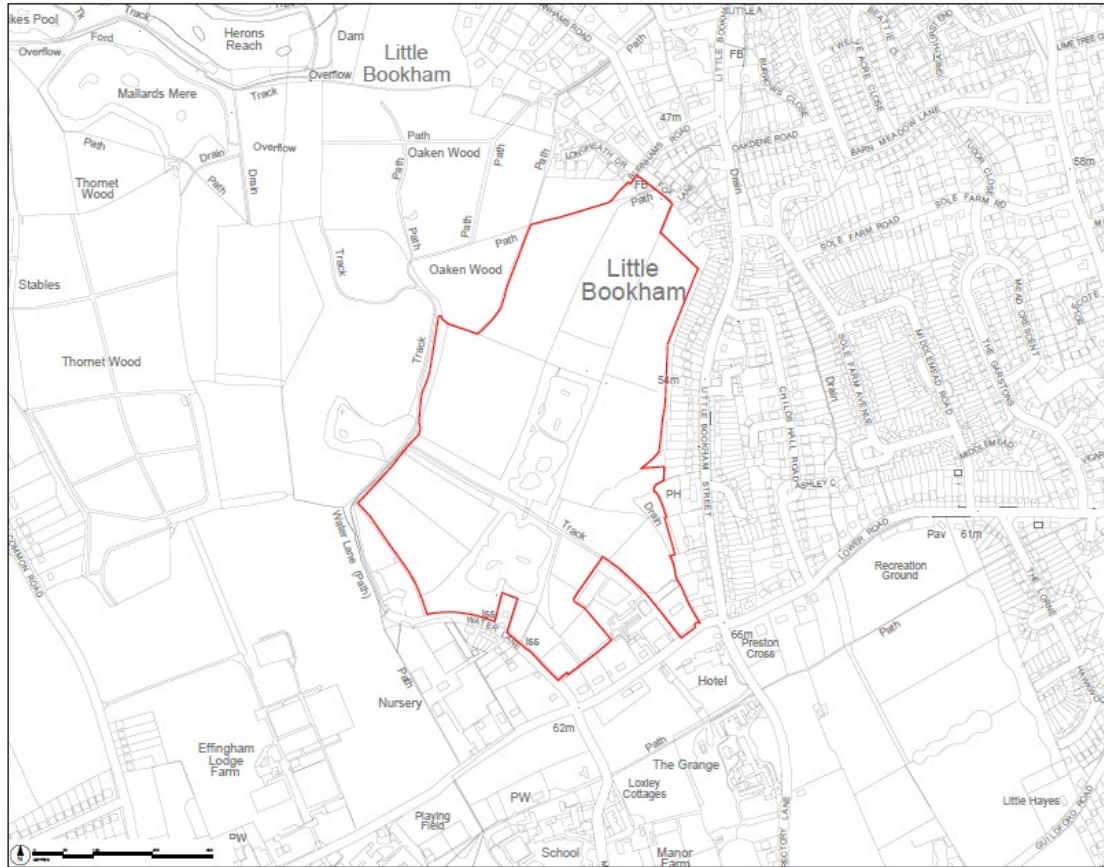
**(10) a financial contribution of £7,000 to Surrey Police for the installation of 1 ANPR camera near the site entrance**

**planning permission be GRANTED subject to conditions**

**OR**

**RECOMMENDATION: B: In the event that a satisfactory legal agreement is not received by the above date or any other such date as agreed in writing by the Deputy Chief Executive and Executive Head of Service (Planning and Place), planning permission be REFUSED for the appropriate reasons.**

**Site Plan:**



## 1. Description of Site:

- 1.1. The site is located to the north of Lower Road, north-east of Water Lane and west of Little Bookham Street. It has an area of 27.4 hectares and consists of several open fields (currently grassland), some woodland, ponds and a residential property that takes access off Lower Road. It is bordered by existing residential development alongside its northern, eastern and southern boundaries as well as commercial development to the south-west. The west and north-west of the site is bordered by a mix of woodland and fields.
- 1.2. There are three ponds in the centre of the site running from the south-west to the north-east. The area immediately around the ponds is wooded. As one moves towards the north-west of the site, there are three areas of open fields, all laid to grass and all of which are bordered by trees.
- 1.3. None of the trees on the site are protected by a Tree Preservation Order although some fall within the boundary of the Little Bookham Conservation Area. The Conservation Area includes an area of land at the southern end of the site close to the point where it meets Lower Road.
- 1.4. There are two public rights of way crossing the site (Routes 76 & 84).
- 1.5. Ground levels fall away from the south-eastern and south-western corners of the site towards the ponds in the centre of the site.

- 1.6. The ponds were constructed in the 1960s for fishing and to store water for irrigation purposes. They are linked by underground pipework and have overflows to a watercourse which runs north eastwards through the centre of the site along the eastern edge of the ponds. The watercourse leaves the site via a Thames Water surface water sewer and a private culvert that runs beneath Fox Lane.
- 1.7. The entire site falls within Flood Zone 1 – area of lowest risk of flooding. There is a high risk of surface water flooding on some parts of the site associated with the ponds, but no built development is proposed in these areas.

## **2. Description of Proposal:**

- 2.1. This is an outline planning application with all matters reserved except for the means of access to the site, for a residential development of up to 200 dwellings to include a community building of up to 929 sqm (Use Class E & F), gypsy and traveller pitches up to 0.2 ha, a Suitable Alternative Natural Green Space (SANG) and public open space, landscaping, surface water drainage and other associated infrastructure together with the demolition of the existing dwelling at No. 330 Lower Road.

### Submission of amended plans

- 2.2. When this application was first submitted in early 2024, the gypsy and traveller pitches, community building, SANG car park and a small area of residential development were indicated as being on land at the southern end of the site whilst the majority of the proposed housing was indicated as being on the eastern part of the site.
- 2.3. The publication of the Examining Inspector's report into the then emerging Mole Valley Local Plan 2020-2039 made it clear that the land at the southern end of the site should be retained within the Green Belt to act as a buffer between the new development and existing development further south in Effingham. The western half of the site should also remain within the Green Belt as a Suitable Alternative Natural Green Space (SANG) to serve the future occupiers of the new housing as well as the surrounding community. The Examining Inspector was satisfied that the eastern part of the site, which shares a boundary with houses in Little Bookham Street and Fox Lane, could be released from the Green Belt for new housing development.
- 2.4. Following the adoption of the Mole Valley Local Plan 2020-2039 in October 2024, the site now benefits from a residential allocation of approximately 200 dwellings and associated development (Policy DS8). The site allocation includes the partial release of the eastern portion of the site from the Green Belt. Policy DS8 requires that all built form be focussed on the eastern part of the site. The remainder of the site, including the western and southern areas are to be retained within the Green Belt.
- 2.5. In response to the publication of the Examining Inspector's report and the adoption of the new Local Plan, the applicants amended their proposal to relocate the gypsy and traveller pitches, community building and all of the housing to the eastern part of the site. The SANG car park continues to be

located within the Green Belt at the southern end of the site and the proposed Locally Equipped Area of Play (LEAP) has also been relocated into this area. It is intended that a pedestrian/cycle path would run through the southern part of the site connecting Water Lane to the new residential development and ultimately linking with an existing Public Right of Way that leads into Fox Lane and beyond to the railway station. The walking route within the SANG was also amended at the request of Natural England.

- 2.6. A full round of consultation was undertaken on the basis of the amended plans.

### The Proposal

- 2.7. More than 50% of the total site area would be public open space and this would include the 12.39 hectares of country park (SANG).
- 2.8. The community building would serve existing and new residents. A Locally Equipped Area of Play (LEAP) - a children's playpark – is proposed close to the edge of the country park.
- 2.9. The application is accompanied by four Parameter Plans which, if the application were to be permitted, would be formally approved as part of the decision-making process. The Parameter Plans relate to the following matters:
- Land Use
  - Green Infrastructure
  - Building Heights
  - Access and Movement
- 2.10. The Land Use Parameter Plan indicates that the built form would be focussed alongside the eastern boundary of the site adjacent to the existing built-up area. The ponds, woodland and open fields in the centre and on the western part of the site would be retained and remain undeveloped. The residential development would be arranged in two main areas, the first being located in the south eastern part of the site and extending from the site access off Lower Road towards the centre of the site and the second and principal area of housing would be arranged in a south-westerly / north-easterly form, extending across the area between the rear of the neighbouring housing on Little Bookham Street and the woodland in the centre of the site. A community building and its associated car park are shown positioned towards the south-eastern end of the site. An area for gypsy and traveller pitches is shown positioned between the community building/car park area and the rear of several properties on Little Bookham Street. A car parking area for the SANG and Locally Equipped Area of Play (LEAP) would be positioned beyond the southern end of the built-up area, near the entrance to the SANG.
- 2.11. The Green Infrastructure Parameter Plan shows the retention of the ponds and woodland in the centre and western part of the site together with the retention of a 'finger' of trees extending into the site on the eastern boundary and other trees on the northern and eastern edges of the site. Undeveloped 'buffer zones' are also shown between the existing woodland and the proposed areas of built form. In addition, this plan shows the extent of the

proposed country park (SANG) on the western part of the site. The plan also identifies the location of proposed areas of public open space which would include general open space, a Locally Equipped Area of Play (LEAP), Doorstep play and drainage features.

- 2.12. The Building Heights Parameter Plan shows that the intended building heights across the site would range from single storey to three storey, with the majority being 2.5 storey with limited 3 storey on key corners. The area at the south eastern end of the site between the site entrance and the community building/gypsy and traveller pitches, together with the area just beyond the community building and gypsy and traveller pitches would consist of buildings up to two storeys in height with some 2.5 storey buildings on key corners. The community building and the gypsy and traveller area is shown as single storey. Three storey buildings would be focussed in the north-eastern corner of the site and a further band of three storey buildings would extend across the width of the built-up part of the site between the 'finger' of woodland and the SANG. Either side of that band of three storey properties would be 2.5 storey buildings with some 3 storey elements on key corners.
- 2.13. The Access & Movement Parameter Plan shows a single vehicular access point to the site at its south-eastern corner off Lower Road. Pedestrian and cycle access to and from the site could also be taken from this point. The parameter plan also shows a proposed pedestrian and cycle access point off Water Lane crossing the Green Belt land at the southernmost end of the site. An existing public right of way (PRoW) is shown on part of the western boundary of the site leading to Fox Lane, together with a proposed pedestrian and/or cycle path connecting the residential development in the north eastern corner of the site to it.
- 2.14. The application is also accompanied by an Illustrative Landscape Masterplan and Illustrative Masterplan both of which can be found in the Design & Access Statement Addendum Document.
- 2.15. The Illustrative Landscape Masterplan provides an indication of how the SANG could be laid out including the various types of planting that could be introduced within it. This includes meadow planting suitable for different ground conditions together with areas of long grassland management, a community orchard, native woodland and hedgerow planting, native shrub planting and public realm planting. The location of trees to be removed is also shown together with the location of attenuation basins, ditches and wet areas. This plan includes the 2.3km circular pedestrian and cycling route around the SANG.
- 2.16. The Illustrative Masterplan shows one way in which the 200 dwellings and community building and gypsy and traveller area could be arranged on the site together with internal vehicular and pedestrian routes. This plan gives an indication of individual plot sizes and car parking throughout the site, as well as existing and proposed planting, the location of the existing ponds and a proposed attenuation basin.

- 2.17. The detail of these two plans is, however, purely for illustration purposes only. As such, these illustrative drawings would not form part of any outline permission, if the application were to be approved.
- 2.18. The applicants are proposing that 40% of the total number of units would be affordable (80 affordable units in total) and that both the market units and the affordable homes would include a mix of unit sizes.

### 3. Recent Planning History

MO/2023/1626

Land North West of Preston Farm, Lower Road, Little Bookham, Leatherhead, Surrey

Screening opinion pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations (2017) (“the EIA Regulations”) for a proposed development of approximately 200 dwellings (Use Class C3), alongside with associated infrastructure, a Country Park (Suitable Alternative natural Greenspace (SANG)), a community and/or medical facility, play space and three gypsy and traveller pitches.

ENVIRONMENTAL IMPACT ASSESSMENT - NOT REQUIRED

30-Nov-2023

### 4. Statutory/Internal Consultations

- 4.1. **SCC – Lead Local Flood Authority (LLFA):** Satisfied with the proposed drainage scheme. Conditions recommended.
- 4.2. **Thames Water:** No objection to the application with regard to foul water sewerage network infrastructure capacity. Providing surface water is not discharged to the public network, Thames Water raise no objection. However, approval for surface water drainage arrangements should be sought from LLFA. General advice given in relation to any works that may involve working near to or diverting Thames Water pipes. If permission is recommended, an Informative should be included advising the developer that a Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. As part of this, the developer should demonstrate measures to be undertaken to minimise groundwater discharges to the public sewer. It is recommended that petrol/oil interceptors be fitted in all car parking areas in order to avoid oil polluted discharged entering local watercourses.

*Officer comment: Thakeham Homes confirmed by letter dated 24<sup>th</sup> April 2024 that they note the informative recommended by Thames Water.*

- 4.3. **Natural England:** Suggests that the LPA records an Appropriate Assessment for the site.

Following receipt of further information, in the form of an amended SANG Management Plan on 13<sup>th</sup> December 2024, Natural England is satisfied with the proposal. They consider that the identified impacts on the Thames Basin Heaths SPA can be appropriately mitigated with measures secured via planning conditions or obligations as advised. The following documents should be secured to ensure the proposals, including the financial obligations as set out within it are carried out as per the mitigation within the HRA: - SANG

Management Plan V5 – submitted 13/12/2024.

A lack of or a withdrawal of an objection does not mean that there are no significant environmental impacts. Natural England advises that all environmental impacts and opportunities are fully considered and relevant local bodies are consulted.

- 4.4. **SCC Environmental Assessment Officer** - Habitat Regulations Assessment – Appropriate Assessment. Conservation of Habitats and Species Regulations 2017 (as amended). Taking account of the findings of the submitted application site bat surveys, the geographical relationship of the SAC and the site, and the nature of intervening land uses it is concluded the scheme would not give rise to likely significant effects on the Mole Gap to Reigate Escarpment SAC with respect to the Bechstein's bat colony and its supporting habitats. Considering the embedded mitigation proposed in the form of the new SANG, the development would not give rise to likely significant effects on the Thames Basin Heaths SPA from additional recreational pressure. That conclusion is subject to the new SANG achieving Natural England approval. Provision of the SANG and measures to achieve its long-term management must be secured by planning condition or legal agreement as appropriate.
- 4.5. **SCC Heritage Officer (HO)** – No heritage concerns regarding demolition of No. 330 Lower Road. The wooded areas on the application site contribute to the setting of the listed buildings on Little Bookham Street. Welcomes post and rail fence on Lower Road boundary. Need to ensure at RM stage that community building is not dominant in views from Lower Road. Concludes - low degree of less than substantial harm to the character and appearance of the conservation area, subject to reserved details. This low level of harm will need to be weighed against the provision of housing in Mole Valley. Heritage Officer is not of the opinion there are sufficient heritage grounds to refuse the application
- 4.6. **SCC Archaeology**: The amended and additional information as detailed the submitted Design & Access Statement Addendum, uploaded 27/11/2024, does not alter SCC Archeology's comments as uploaded on 27/02/2024, namely:

The Applicant's Desk Based Archaeological Assessment considers the proposed development site to have a generally low or moderate potential for the presence of Heritage Assets of archaeological significance. Given the extent of the site and in order to better define its archaeological potential, further archaeological work is required. Initial phase of work should comprise geophysical survey. This would be followed by trial trench evaluation the results of which would enable any further mitigation measures to be determined. Both the geophysical survey and trial trenching can be done following the determination of the Outline scheme but before the determination of any Reserved Matters application. The archaeological evaluation and geophysical survey will need to be defined by a Written Scheme of Investigation. Condition recommended & Informative recommended.

**Officer comment:** *Thakeham Homes confirmed by letter dated 12<sup>th</sup> April 2024*



*that they accept the pre-commencement planning condition as recommended by the County Archaeologist.*

4.7. **SCC – Highway Authority (taking into account the requirements of the Senior Countryside Access Officer with regard to Public Rights of Way & Countryside Access)**: Having assessed the application on safety, capacity and policy grounds, the following S106 obligations and planning conditions should be imposed on any permission granted:

A] a satisfactory S106 Agreement to secure:

- 1) The Travel Plan auditing fee of £6,150 and sustainable travel vouchers for the residents
- 2) An index linked sum of £40,000 per annum over a period of 5 years - a total contribution of £200,000 to be paid to Surrey County Council, prior to the first occupation of the development site, for the provision by the County Council of a weekly Digital Demand Responsive Transport (DDRT) bus service including evening and weekend bus services
- 3) prior to first occupation of the development, 1 x electric car club vehicle and 1 electric vehicle parking space to be provided within the development site in accordance with a scheme to be submitted to and agreed in writing by the Local Planning Authority. The car club parking space shall be provided with a fast-charge electric vehicle charging point. The car club shall be promoted as part of the sales and marketing of the development. All residents shall be offered two years free membership of the car club upon occupation of their new home as well as £50 driving credit. The vouchers shall be offered to multiple residents at the same address.

B] planning conditions to secure S278 works covering:

- the provision of the vehicular/pedestrian/cycle access off Lower Road and associated visibility splays
- the provision of the pedestrian / cycle accesses to Water Lane, the footway and the informal pedestrian crossing on Lower Road have been constructed and provided with visibility zones
- Upgrading the Preston Cross bus stops on Lower Road and the General Stores bus stops on Little Bookham Street) with bus shelters, accessible pedestrian crossing facilities, Real Time Passenger Information with power supply. Accessible raised kerbing for a length of 9m to assist with the boarding and alighting of passengers using these bus stops. Provision of an informal crossing point with dropped kerbs and tactile paving on Little Bookham Street to improve the walking route to the station and crossing between bus stops.
- improvements to the existing Public Rights of Way (PRoWs) within the site (including alignment, landscaping, surfacing and countryside furniture) to provide a cycle and pedestrian link between Water Lane and Fox Lane. This work will include the temporary closure and alternative route provision of the PRoW's during construction works; the design, specification and Approval in Principle for the replacement of the existing bridge carrying the PRoW and the legal mechanism to permit cycling on a public footpath and an upgrade of

the rights of way network to mitigate the increased usage related to the proposal to be carried out via a S278 Agreement with SCC.

C] general highways conditions covering issues such as CTMP, parking and turning, provision of fast charge sockets for electric vehicles, cycle storage including charging for e-bikes, submission of a Travel Plan

4.8. **SCC Countryside Access Officer (regarding Public Rights of Way and countryside access):** Footpath 84 is partially within the site. Footpath 76 and the remainder of footpath 84 border the site. Footpath 119a is to the south and Footpath 116 to the north west.

The applicant intends to improve the PRoW network connecting to Fox Lane and thereby improve the walking route to the north and connections to Bookham Station.

The application proposes to retain and re-surface the existing footpaths through the site and allow cycle access and to widen footpath 84 PRoW.

Further information should be provided in relation to:

- 1) the design of the changes to the PRoW's their surfacing, widths, gradients, landscaping and structures
- 2) the legal mechanism to permit cycling on Footpath 84
- 3) AIP for replacing the existing pedestrian bridge
- 4) proposals for temporary closure of PRoWs and alternative route provision during construction works
- 5) a financial contribution for the proposed upgrade and future maintenance of the PRoW network to mitigate the increased usage.

***Officer Comment:** The final views of the CHA Highways (set out above) include a response to the issues raised by the Countryside Access Team and a suitable planning condition is recommended to secure details of works affecting the PRoW's. As such, the CHA and officers of MVDC are satisfied that the Countryside Access Officer's queries regarding PRoW's can be satisfactorily dealt with by way of planning condition.*

4.9. **Active Travel England (ATE):** Following a review of the planning consultation, it has been determined that standing advice should be issued. The LPA should consider this advice as part of its assessment of the application.

4.10. **SCC – Education:** *We have reviewed the development and any impact on pupil numbers in the area and concluded that we have sufficient provision in the area to accommodate the additional pupil yield anticipated from this*

development. Therefore, there are no further comments from us.

4.11. **Affordable Housing Officer:**

The application states that up to 80 on-site affordable units would be provided. This meets with policy requirements in the adopted Local Plan 2020-2039 and would make a clear contribution to meeting affordable housing need in the District.

The proposal would include the provision of the following percentage of affordable units which are agreed:

	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>3 Bedroom</b>	<b>4 Bedroom</b>	<b>Total %</b>
<b>First Homes</b>	5%	0%	0%	0%	<b>5%</b>
<b>Shared Ownership</b>	5%	18%	2%	0%	<b>25%</b>
<b>Affordable Rent</b>	8%	28%	13%	0%	<b>49%</b>
<b>Social Rent</b>	0%	0%	13%	8%	<b>21%</b>
	18%	46%	28%	8%	100%

It is reassuring that the applicant is committed to providing the largest units as Social Rent. We would like this to be secured within the S106, detailing the percentage of each size unit within each tenure. This will also support the right units for each of the other tenures.

The affordable units should be dispersed across the site where possible and indistinguishable from the market units. The affordable units must meet 'Technical housing standards – nationally described space standard'

4.12. **Tree Officer:** This site borders two areas of ancient woodland and the proposed access to the site is within Little Bookham conservation area. Further to looking at the documents provided in this application it shows that to the northeast of the site the proposed SANG 2.3km circular route will pass close to the red line boundary and therefore the ancient woodland. Care should be taken here to ensure this irreplaceable habitat is not damaged or disturbed by the creation of this path and sufficient distance between the woodland and path should be given. The application will retain a large number of trees ensuring the site will be in keeping with the area and the initial arboricultural impact assessment is in line with best practice. Considering this there are no objections to be raised on with regards to trees.

4.13. **NatureSpace (re Newts):** satisfied with the ecological information submitted and would recommend that a precautionary working method statement is submitted to further reduce the risk onto great crested newts and/or their habitats. A 'pre-commencement' planning condition is recommended.

4.14. **Surrey Wildlife Trust:** - make the following summarised points:

Statutory Designated Sites – Note that Natural England are satisfied and raise no objections to the proposal in this regard.

Bats – No objections re bats – conditions recommended.

Designated Sites: Non-Statutory - No comment re Thornet Wood which is in private ownership.

Habitats – Ancient Woodland – satisfied that Oaken Wood is privately owned so any access into this area would represent trespass. Recommend that the SANG delivery is in accordance with Natural England's requirements.

Protected Species – Amphibians – No objection – conditions recommended

Protected Species – Badger – No objection – condition recommended for updated badger survey as well as mitigation and habitat strategy.

Protected Species – Birds – No objection. Recommend pre-commencement condition.

Protected Species – Reptiles – No objection. Recommend pre-commencement condition

Biodiversity Net Gain – Notes the proposed development is not subject to mandatory biodiversity net gain (BNG). The current strategy for habitat creation includes approximately 2.87ha of very high distinctiveness habitat and approximately 2.27ha of high distinctiveness habitat. This includes the creation of floodplain wetland habitat, which indicates that a baseline hydrological system/process is in existence. It is important that the baseline and outline BNG assessment is fully understood by the LPA. It is feasible that the proposal could provide habitat creation and enhancement. SWT recommend a pre-commencement condition to secure a Landscape and Ecological Management Plan or a Habitat Mitigation and Monitoring Plan (HMMP).

Watercourse Units/Spring Line - SWT do not review or provide comment on matters relating to hydrology so they sought advice from South East Rivers Trust (SERT) regarding the presence or absence of chalk stream on the site. SERT advised SWT that, in their opinion, chalk stream and aquifer-fed naturally fluctuating water bodies Habitats of Principal Importance are present on site. SWT visited the site in January 2025 and noted the presence of a watercourse that held water. Confirmation of whether the watercourse is fed from chalk bedrock may require a hydrological report. However, SWT gives weight to SERT's opinion that chalk streams are present on site. SWT also notes that the applicant has rebutted the presence of chalk streams on the site. The LPA is referred to the opinion of SERT on this matter. Notwithstanding this, should the LPA be minded to grant planning permission, a CEMP and a LEMP should be secured by pre-commencement condition. This should include suitable buffer protection through the construction and operational phases of the development and appropriate treatment of any runoff to protect the habitat

4.15. **National Trust:** The site is situated about 750m to the south of Bookham Commons which is owned by the National Trust. Bookham Commons is designated as a Site of Special Scientific Interest (SSSI). It has two important habitats:

- 1) Bookham Commons – consists of woodland, open glades and ponds
- 2) Grazing Paddocks – permanent tussocky and wet grassland, scrub and woodland

Both of these habitats support a rich variety of biodiversity.

Bookham Commons is popular for walking, running, cycling, horse riding, informal leisure and bird watching – all of which needs to be managed by the National Trust to minimise impact on habitats and species.

The National Trust does not object to the proposed development in principle but raises concerns regarding the potential impact of additional footfall on the Bookham Commons SSSI.

In recent years there has been an increase in footfall on the Commons and a rise in dog walking both of which disturb migrant and ground nesting birds. A further increase in footfall will worsen the adverse impact on sensitive habitats and wildlife to the detriment of the SSSI.

The Applicant's Ecology Impact Assessment acknowledges the distance between the application site and Bookham Commons SSSI but fails to assess the impact of the development on the SSSI. This omission should be rectified before the application is determined.

The Trust would expect likely adverse impacts on the SSSI to be identified together with appropriate measures to mitigate these impacts and safeguard the SSSI.

The National Trust is willing to work with the Council and the applicants to formulate an agreed framework to deliver the measures to mitigate the adverse impacts of the proposed development. This may include a financial contribution by the applicants towards the cost of implementing and maintaining management measures to mitigate the impact of increased footfall and dog walking on important habitats and protected species at Bookham Commons.

*Officer comment - The application site is around a 20 min walk from the Bookham Commons and is therefore more distant than the National Trust suggest.*

*The proposed development has a sizeable SANG and also a car park for wider use of the SANG so may in fact draw some visitors away from Bookham Commons rather than increase pressure there.*

*The SANG is being created to offset the impact to the Thames Basin Heath as the Council is legislatively required and policy bound to do. There is no requirement to create country parks to offset any impacts to SSSI's in the same manner and this has been the focus of the new Local Plan.*

*The National Trust do not have visitor surveys for Bookham Commons and so there is no evidence as to what degree of impact the development may have on it because there is no data around visitor use or habits.*

*Whilst the National Trust say they would welcome a financial contribution from the developer, officers consider that a contribution towards the Bookham Commons is not reasonably justified in this case as the impact cannot be quantified. As a result, there is no ability to specify any cost to the developer.*

*The National Trust was advised of officers views on their request for a financial contribution. They were re-consulted on the application following the submission of the amended plans and advised that they have “no further comments to make on the application”.*

- 4.16. **NHS Surrey Heartlands Integrated Care Board (ICB):** The housing mix (flats/housing) of the 200 dwellings is not explicitly specified in the submitted documentation, we have therefore assumed the 1-bedroom units will be flats and 2 - 4+ bedroom units will be houses for both market and affordable tenures. Based on these current assumptions, the proposed development is expected to result in an additional 345 persons (SidM Report) which will have an impact on the local healthcare infrastructure. The current proposals currently make no direct mitigation to address its impact on primary healthcare in the area.

The ICB have considered mitigation options and identified that a financial contribution in lieu aligns best with the ICB's estate strategy. A financial contribution of £191,991 is therefore sought to mitigate the impact of the proposed development on primary health care.

When considering the impact of new homes and increased patient numbers, the ICB has considered infrastructure needs at both individual practices and Primary Care Networks (PCN) levels. This planning application falls within the Leatherhead PCN. The closest GP premises affected are, Fairfield Medical Practice and Eastwick Park Medical Practice. Mitigation measures may need to occur at a combination of these sites.

The ICB consider that the financial contribution is reasonable in scale and kind because it is based on the size and nature of the development. The financial contribution would be secured via a Section 106 Agreement.

- 4.17. **Sustainability Adviser:** has reviewed the Applicant's Energy Statement and confirms that they should be able to meet the 10% from Air Source Heat Pumps and solar PV.

*Officer comment – Policy EN13 of the Mole Valley Local Plan 2020-2023 requires all new development to be zero carbon ready (i.e. it should need no significant work to ensure that they have zero carbon emissions as the grid decarbonises). The applicants intend to use a combination of air source heat pumps and solar photovoltaic panels in the scheme and are confident they can achieve a net zero carbon performance across the development, details of which could be secured at Reserved Matters stage. A suitable condition to ensure the development aligns with the aims of policy EN13 is recommended.*

- 4.18. **Environmental Health**

**Noise Assessment**

*The noise assessment submitted in support of the application indicates that there are no adverse impacts present at the site.*

*No Comments to make in regard to Noise issues.*

**Contamination**

*With regard to contamination, no material impacts are considered to be present that require control through the planning process.*

*Air Quality- Industry standard techniques have been used to assess the impacts on Air quality from both construction and future operational transport impacts and there are deemed to be no material impacts.*

- 4.19. **Mole Valley Access Group**: There is no specific mention of disabled access considerations or disabled parking details in the outline plan. Would any of the homes be 'accessible homes'? The play areas and community walk links must be made accessible for wheelchair users. Bark floor finishes must be reconsidered and materials approved under BS830001 should be used. Play equipment for disabled use should be used to promote inclusivity. There is no detail regarding the design, lift access or emergency access for the blocks of flats. Would fire safe lifts be used or other forms of safe independent egress in emergency? Support the proposed community building, however, its design must integrate Disability/Access design BS8300 part 1 & 2 standards, Building Regulation Part M recommendations including a loop facility. New connection via pedestrian and cycling Pathways to be designed with sufficient width and drops for wheelchair and elderly users (need to consider surfaces/finishes that allow partially sighted/blind impairment safe usage) to navigate especially if multi-purpose.

*Officer comment: All detailed information relating to accessibility will be addressed as part of any future Reserved Matters planning application. The applicants will, however, need to comply with policy H10 of the Mole Valley Local Plan 2020-2039 which will require a minimum of 10% of the new dwellings to meet Building Regulations standard Part M4(2) 'accessible and adaptable dwellings' and a minimum of 5% of the new dwellings to meet Building Regulations standard Part M4(3) 'wheelchair adaptable' to help meet the specific needs of older people and those with mobility, accessibility and support needs. Matters such as the use of 'fire-safe lifts' would fall to be considered under Building Regulations and is not a planning issue. The design of the community building would form part of a Reserved Matters application. Works to PRow's will be secured via condition as recommended by the County Highway Authority.*

- 4.20. **Guildford Borough Council** (neighbouring Authority consultation response): No objection.

- 4.21. **Ramblers Association**: Queries how the Public Rights of Way (PRow) through the site will be protected during construction and whether the boundaries of the site would be fenced off. The internal footpaths and roads within the site do not appear to intersect with the PRow's. If the PRow's are to be confined by high fences or reduced in width, the Ramblers Association would raise objection. Requests further details regarding fencing of the western boundary alongside the PRow's

*Officer comment: A suitable condition has been recommended by the County Highway Authority to secure all the necessary information relating to the PRow's*

- 4.22. **Surrey Police Crime Reduction Advisor & Designing Out Crime Officer**: The Design and Access Statement does not make any reference to security

of safety measures proposed for the development. Design security measures should be included such as external lighting, orientation of the dwellings, natural surveillance, defensible space and the ongoing maintenance of the site as a whole. In addition security should be built into the individual properties such as door and window sets, perimeter fencing, external lighting and general access control. The development would benefit from being accredited by Secured by Design standards – preferably at the Gold standard. It would be desirable to have achievement of a Secured by Design accreditation to be included as a condition of any approval.

*Officer comment: This is an Outline planning application and therefore the level of detail being sought by the Crime Reduction Advisor is not known at this stage. However, the requested details will be addressed and incorporated into any future Reserved Matters planning application. An informative is recommended encouraging the applicant to seek accreditation to Secured by Design Standards.*

- 4.23. **Surrey Police:** Seek a financial contribution of £7,000 towards the installation of an Automatic Number Plate Recognition (ANPR) camera near the site entrance.

## 5. Third Party/Other Representations

- 5.1. Please see Appendix 1 for a summary of all third party/other representations received during the course of this planning application.

## 6. Constraints

Article 4 Direction  
Sutton & East Surrey Water Company Area  
Dev Affecting Anc Woodland/within 500m  
Site of Archaeological Potential  
Thames Water Utilities/Env Agency Thames  
Built-up Area  
Metropolitan Green Belt (CS1)  
Thames Water Utilities  
Within 100m of another Local Authority  
Conservation Area (within 10m Urban)  
Within 5km of a Special Protection Area  
Within 15m Site Archaeological Potential  
LandscapeCharArea - OckhamClandon  
Local Noise Residential  
Bookham NDP Neighbourhood Area  
Deciduous woodland  
GCNIZ\_3 - Amber  
GCNIZ\_4 - Red  
Conservation Area - Little Bookham

## 7. Development Plan Policies

Mole Valley Local Plan 2020-2039

S1 – Sustainable Mole Valley  
S2 – Combatting the Climate Emergency



S5 – Retaining and Investing in Natural Capital  
H1 – Housing Delivery  
H3 – Affordable Housing  
H5 – Gypsy, Travellers and Travelling Showpeople Accommodation  
H9 – Housing Mix  
H10 – Standards for Accessibility, Water and Space  
EN1 – The Green Belt  
EN4 – Character and Design  
EN5 – Inclusive Environments  
EN6 – Heritage Assets  
EN8 – Landscape Character  
EN9 – Natural Assets  
EN10 – Open Space and Play Space  
EN12 – Pollution Control  
EN13 – Standards and Targets for Combatting the Climate Emergency  
INF1 – Transport  
INF2 – Parking  
INF3 – Flood Risk  
INF4 – Community Facilities  
D1 – Infrastructure Delivery  
D3 – Development Sites  
DS8 – Land North West of Preston Farm, Bookham

Government Guidance:

National Planning Policy Framework (NPPF 2024)

Section 2 – Achieving Sustainable Development  
Section 4 – Decision-Making  
Section 5 – Delivering a sufficient supply of homes  
Section 8 – Promoting Healthy and Safe Communities  
Section 9 – Promoting Sustainable Transport  
Section 11 – Making effective use of land  
Section 12 – Achieving well-designed and beautiful places  
Section 13 – Protecting the Green Belt  
Section 14 – Meeting the Challenge of Climate Change  
Section 15 – Conserving and enhancing the natural environment  
Section 16 – Conserving and enhancing the historic environment

Planning Policy for Traveller Sites (Dec 2024)

Supplementary Documents

Affordable Housing SPD 2010, updated January 2018  
Affordable Housing SPD Addendum, updated January 2019  
Bookham Neighbourhood Development Plan  
Nationally Described Space standards  
Landscape SPD  
Built Up Areas Character Appraisal  
Conservation Area Appraisals & Management Plans  
Vehicular and Cycle Parking Guidance

**8. Planning Analysis**

- 8.1. Legislation dictates how all planning applications must be determined. Section 70 of the Town and Country Planning Act (as amended) states -

In dealing with an application for planning permission the authority shall have regard to -

- (a) the provisions of the development plan, so far as material to the application,
- (aza) a post-examination draft neighbourhood development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations

- 8.1.1. The main planning issues for consideration are discussed below.

## 8.2. **Principle of Development**

- 8.2.1. At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 states that, in terms of the decision-making process, this means approving development proposals that accord with the development plan without delay; or, 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 the Framework that protect areas or assets of particular importance provides a strong 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 the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

- 8.2.2. The Council's latest five-year housing land supply position is set out in Paragraphs 154-156 of the Inspector's Report on the Examination into the Mole Valley Local Plan. The Inspector concluded that on adoption of the Local Plan, there would be a deliverable supply exceeding the five-year requirement by some 404 net dwellings. The Council can therefore demonstrate a five-year supply and the presumption in favour of sustainable development, as set out in Footnote 8 of the NPPF, does not apply.

- 8.2.3. The latest Housing Delivery Test result (2023) for Mole Valley was 78%. As this is below 85%, an additional buffer of 20% is required in the five-year supply. The Council's latest five-year housing land supply position already includes a 20% buffer. As the Housing Delivery Test result is above 75%, the presumption in favour of sustainable development, as set out in Footnote 8 of the NPPF, does not apply.

- 8.2.4. Policy S1 (Sustainable Mole Valley) sets out that the Council will expect development proposals and use of land to contribute positively to the social,

economic and environmental enhancement of Mole Valley. Planning applications that are consistent with the policies in the Plan (and with relevant policies contained within other elements of the Mole Valley Development Plan) will be supported, unless material considerations indicate otherwise.

- 8.2.5. Policy H1(2) (Housing Delivery) sets out a number of ways in which Mole Valley's Housing Requirement will be achieved. Of relevance to this application is d) dwellings delivered through site allocations, as detailed in Chapter 8 and shown on the policies map.
- 8.2.6. The application site is allocated for residential development under Policy DS8 of the Mole Valley Local Plan 2020-2039, with an indicative capacity of 200 dwellings and at least 3 gypsy and traveller pitches.
- 8.2.7. Policy DS8 of the Local Plan 2020-2039 sets out a series of criteria that development proposals are required to comply with - see table below:

DS8 Criterion	Officer comment
<p>1) To locate built development within the eastern part of the site, which is excluded from the Green Belt, as shown on the Policies Map</p>	<p><i>The amendments to this application now show all buildings, including the area of gypsy and traveller pitches, the community building and all housing focussed on the eastern part of the site, outside the Green Belt.</i></p> <p><i>This aligns with criterion 1.</i></p> <p><i>A public car parking area serving the SANG, footpaths within the SANG, a play area and a pedestrian/cycle link to Water Lane would be located in the Green Belt. However, these are related to the recreational use of the land and are therefore considered to be appropriate development in the Green Belt.</i></p>
<p>2) Create clearly defined boundaries between the edge of the residential development and the Green Belt using physical features which are recognisable, likely to be permanent and consistent with the character of the surrounding environment</p>	<p><i>The existing tree belts in the centre of the site will be retained and will act as an effective screen between the new housing and the more open areas of the SANG further to the west (which is in the Green Belt) and the wider landscape beyond. The ponds will be retained as a permanent edge to the development. The landscaping of the SANG will be enhanced with orchard, scrub, native tree planting and meadows – the long-term management of which will be secured via the S106 Agreement. Hedging, trees or informal native planting will be introduced around</i></p>

	<p><i>the SANG car park and the LEAP to the south of the built-up part of the site to assimilate these features in the landscape.</i></p>
<p>3) Conserve and where possible enhance the setting of heritage assets including Little Bookham Conservation Area and nearby listed buildings</p>	<p><i>The SCC Heritage Officer is satisfied that the proposal has due regard to the setting of nearby listed buildings and would result in only a low degree of less than substantial harm to the character and appearance of the conservation area, subject to reserved details.</i></p> <p><i>Criterion 3 is satisfied with regard to nearby listed buildings. The low level of harm to the Conservation Area is outweighed by public benefits associated with the proposal.</i></p> <p><i>See below under the heading of 'Impact on Heritage Assets'</i></p>
<p>4) Retain the existing ponds and incorporate them into the proposal for management and enhancement of biodiversity on site</p>	<p><i>The existing ponds will be retained and will form an integral part of the wetland environment within the wider SANG.</i></p>
<p>5) Maximise retention and safeguarding of existing mature trees and hedgerows, including areas identified as Priority Habitat (deciduous woodland), and incorporate them into a well-integrated landscape strategy</p>	<p><i>The landscape masterplan and green infrastructure parameter plan demonstrate that the scheme is designed to sit within the existing landscape and that significant areas of trees in the centre and on the boundaries of the site will be retained. The rural character of the undeveloped parts of the site would be retained and enhanced.</i></p>
<p>6) Create a Country Park within the land lying to the west of the ponds, providing at least 10.3 ha of Suitable Alternative Natural Green Space (SANG), incorporating walking routes, public car parking and measures for biodiversity enhancement, designed and implemented in accordance with Natural England guidelines</p>	<p><i>The proposal would provide a total of 12.39 ha of SANG and therefore exceeds the policy requirement in this respect. The applicants have engaged directly with Natural England throughout the planning process and have met with their requirements with regard to the provision and line of walking routes, public car parking provision,</i></p>

	<i>biodiversity enhancement and the SANG Management Plan</i>
7) Establish a legal mechanism for long term management of the Country Park/SANG, supporting both public access and an appropriate habitat management regime.	<i>The long term management of the SANG has been subject of discussions with Natural England, the detail of which will be secured via the S106 Agreement. On-going public access and habitat management will form part of the S106.</i>
8) Incorporate any mitigation measures that may be required to address any adverse effects on the integrity of the Thames Basin Heaths Special Protection Area (SPA).	<i>The SANG will mitigate any indirect impacts on the SPA.</i>  <i>The proposed development has been subject of an Appropriate Assessment under the Habitats Regulations which concludes that on the basis of the mitigation proposed in the form of the new SANG, the development would not give rise to likely significant effects on the Thames Basin Heaths SPA from additional recreational pressure.</i>
9) Incorporate sustainable drainage measures to mitigate the risk of surface water flooding in accordance with policy INF3 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment	<i>The site is within Flood Zone 1. The applicant's FRA sets out the mitigation measures to be employed.</i>  <i>An attenuation basin would be formed at the northern end of the SANG and designed with the capacity to manage a 1 in 100 year storm event including 40% allowance for climate change. Water would be discharged from the attenuation basin at greenfield rates.</i>  <i>The drainage scheme would be designed in detail at a later stage.</i>  <i>The LLFA has reviewed the submitted drainage information and is satisfied with the information provided. They recommend conditions.</i>
10) Incorporate an area of approximately 0.2ha with access to	<i>The land use parameter plan indicates that an area of 0.2ha in the</i>

<p>the highway and utilities connections, suitable for delivery of Gypsy and Traveller pitches in accordance with policy H5.</p>	<p><i>eastern part of the site would be made available for Gypsy and Traveller pitch provision. This area would share its access off Lower Road with the remainder of the development. A suitable planning condition is recommended to ensure this area is provided with utility connections.</i></p>
<p>11) Provide a community building capable of accommodating early years education local need, as identified by Surrey County Council and other Class E or F uses responding to the needs of the locality.</p>	<p><i>The application makes provision for a community building that could be used for Class E or F purposes. The provision of the community building will be secured as part of the S106 Agreement.</i></p>
<p>12) In addition to the country park, provide publicly accessible open space and equipped play space in accordance with the standards in policy EN10.</p>	<p><i>The green infrastructure parameter plan indicates that there would be scope to provide areas of public open space on the fringes of the main built-up part of the site and at the southern end of the site alongside Water Lane. A Locally Equipped Area of Play (LEAP) would also be provided near the entrance to the SANG.</i></p>
<p>13) Provide suitable and safe vehicular access from Lower Road.</p>	<p><i>Subject to a recommended planning condition, the County Highway Authority is satisfied that the proposed vehicular access to the site off Lower Road would be suitable and safe.</i></p>
<p>14) Demonstrate through traffic modelling that the proposed development would not have any significant impact on the transport network in terms of capacity or congestion, both individually and cumulatively with other nearby developments, or that any such impact can be mitigated to an acceptable degree.</p>	<p><i>The applicant has submitted a Transport Assessment prepared by i-Transport which has been scrutinised by the CHA. Subject to S106 obligations and recommended planning conditions, the CHA is satisfied that the proposal would not give rise to any significant impact on the transport network and that appropriate mitigation can be secured via a S106 Agreement.</i></p>
<p>15) Liaise with Thames Water to ensure that necessary upgrades to off-site wastewater infrastructure can be delivered by Thames Water</p>	<p><i>Thames Water have commented that they have no objection to the proposal with regard to foul water</i></p>

<p>and that the occupation of the development is phased to align with the delivery of necessary sewerage infrastructure.</p>	<p><i>sewerage network infrastructure capacity.</i></p> <p><i>On the basis that surface water will not be discharged to the public network, Thames Water do not object but advise that the LLFA should be consulted. (The LLFA raise no objection, subject to conditions).</i></p>
<p>16) Provide water efficiency measures such as water butts, rainwater harvesting, water-saving appliances and fittings, with the aim of exceeding the requirements of policy H10, to reduce increased pressure on water supply infrastructure.</p>	<p><i>This level of detail would not be expected as part of an outline application with only access for consideration. However, it can be secured by planning condition.</i></p>
<p>17) Establish walking and cycling routes through the site, connected to surrounding roads and rights of way, at locations which support active travel to work, school and local services.</p>	<p><i>The application makes provision for a walking and cycle link between the site and Lower Road and Water Lane. It would also provide walking and cycling opportunities throughout the SANG and would connect to an existing PRoW at the north-eastern end of the site which links to Fox Lane and ultimately to Bookham Railway Station.</i></p>
<p>18) Incorporate measures to enhance pedestrian and cyclist safety along Lower Road, in order to facilitate safe, sustainable travel to local shops, schools and other services.</p>	<p><i>The proposals involve the provision of a pedestrian/cycle link from the site to Water Lane, the construction of a new footway alongside Water Lane connecting to Lower Road as well as dropped kerbing and tactile paving to facilitate safe crossing of Lower Road. A cycleway connection on Lower Road near its junction with Water Lane would also be provided. In addition, the main entrance to the site off Lower Road would provide safe access for both pedestrians and cyclists and drop kerbs would also be provided near the site entrance to facilitate pedestrians crossing the road. Nearby bus stops at Preston Farm and Little Bookham Street would be upgraded to encourage sustainable travel.</i></p>

<p>19) Incorporate measures for flood risk betterment, aimed at reducing the surface water flow path through and beyond the site.</p>	<p><i>The proposal would make provision for the on-site attenuation of surface water and would ensure that run-off is controlled to reflect greenfield rates. The LLFA is satisfied with the proposals put forward and recommend conditions.</i></p>
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8.2.8. The proposal would require the demolition of No. 330 Lower Road. This is a relatively modern detached property, set back from the roadside. It is 1.5 storeys in height with a substantial roof and dormer windows which are quite dominant when viewed in the street scene. There is no planning policy objection to the removal of this dwelling in order to provide access to the development site.

8.2.9. In summary, the provision of residential development in a sustainable location, within the Suburban Village of Bookham as per the Settlement Hierarchy within the Local Plan (2020-2039), and as part of site allocation DS8, is acceptable in principle subject to other aspects of the proposal complying with the development plan as a whole.

**8.3. Green Belt**

8.3.1. Prior to the adoption of the new Local Plan, the entire application site was located within the Metropolitan Green Belt. However, following the adoption of the Local Plan 2020-2039 which includes site allocation DS8, the easternmost part of the site has been released from the Green Belt for residential and community development. This area is where the housing, community building and gypsy and traveller pitches would be located and now forms part of the built-up area of Bookham as set out in the policies map.

8.3.2. Responding to the Inspector’s report, the applicant amended the scheme so that the southernmost and western parts of the site remain within the Metropolitan Green Belt. The western half of the site is identified as the Country Park/SANG and would include pedestrian and cycle paths. An attenuation pond and a number of low-level bunds would be formed at the northern end of the SANG associated with the surface water drainage arrangements for the site. The southernmost area would include a car park serving the SANG, a LEAP and a pedestrian/cycle link to Water Lane. Further drainage works are proposed near the southern boundary in the form of a meander to the drainage ditch and the formation of a shallow basin.

8.3.3. The Government, in paragraph 142 of the National Planning Policy Framework, attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.



- 8.3.4. As detailed in paragraph 153 of the Framework, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 8.3.5. Paragraph 153 states when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt including harm to its openness. '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.
- 8.3.6. Paragraph 154 of the NPPF states that development in the Green Belt is to be regarded as inappropriate, unless for a number of specifically identified exceptions. Of relevance to this application are sub paragraphs b) and h)ii.
- 8.3.7. Sub paragraph b) of paragraph 154 relates to:  
*'the provision of appropriate facilities including buildings, 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.'*
- 8.3.8. Sub paragraph h) of paragraph 154 covers other forms of development provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. Paragraph ii of sub paragraph h) includes 'engineering operations'.
- 8.3.9. The Planning Practice Guidance (PPG) for Green Belt land states: 'Assessing the impact of a proposal on the openness of the Green Belt, 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 considered 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'
- 8.3.10. Policy EN1 of the Local Plan 2020-2039 reflects the Green Belt advice in the NPPF. Sub paragraph 3d) of this policy allows for appropriate buildings or facilities for outdoor sport, outdoor recreation, cemeteries, burial grounds and allotments, provided the proposed buildings and associated uses or activity would preserve the openness of the Green Belt and not conflict with the purposes of including land within it, by reason of their scale, design or siting. Where external lighting is proposed, or likely to be required, in connection with proposed outdoor uses, this should not result in light pollution adversely impacting on the amenities of neighbouring properties or the surrounding

landscape, taking account of existing levels of artificial illumination in the surrounding area.

- 8.3.11. The SANG car park, LEAP and pedestrian and cycle pathways are all related to outdoor recreation and therefore comply with paragraph 154d) of the NPPF in that they represent 'appropriate' development in the Green Belt. The formation of the proposed attenuation pond and low-level bunds at the northern end of the site and a drainage basin and works to the line of the watercourse at the southern end of the site all represent engineering operations which comply with paragraph 154h)ii of the NPPF. All of these aspects of the proposal are therefore regarded as appropriate development in the Green Belt and none would give rise to any significant harm to the openness of the Green Belt.
- 8.3.12. The proposal is acceptable in Green Belt terms and accords with the NPPF and policy EN1 of the Mole Valley Local Plan 2020-2039.

**8.4. Housing Mix and Affordable Housing**

- 8.4.1. Policy H9 'Housing Mix' of the Local Plan (2020-2039) sets out the desired housing mix of Market Housing to be as follows: 25% 1-bed, 45% 2-bed, 20% 3-bed and 10% 4-bed.
- 8.4.2. The applicant has set out that they propose to base the scheme upon policy H9 of the Local Plan. The detail of the units in terms of mix would follow at Reserved Matters stage.
- 8.4.3. Local Plan policy H3: Affordable Housing seeks 40% of the total number of dwellings to be affordable on development providing a net increase of 10 units. This policy also details the Council's expectations regarding the housing mix of these affordable units. The following table sets out the recommendations of the housing mix and tenures:

1-bed	2-bed	3-bed	4-bed
15%	45%	30%	10%

*Table 1 - Policy H3 Housing Mix*

30% Home Ownership	25% First Homes
	5% Shared Ownership
70% Rented	49% Affordable Rented
	21% Social Rented

*Table 2 - Policy H3 Affordable Housing Tenure*

- 8.4.4. The proposal provides a 40% on-site contribution to affordable housing, which would equate to up to 80 affordable homes. The Council's Affordable Housing (AH) Officer has reviewed the proposal and comments that this would meet the policy requirement and would make a clear contribution towards meeting affordable housing need in the District.

8.4.5. During the course of the application, the Council and the Applicant have engaged in conversations regarding both the housing and tenure mix of the proposed affordable housing. Whilst, this is an outline scheme, it is recognised that it is necessary to agree the housing mix of the affordable units as this provision will be secured by a S106 agreement.

	1-bed	2-bed	3-bed	4-bed	Total %
First Homes	5%	0%	0%	0%	<b>5%</b>
Shared Ownership	5%	18%	2%	0%	<b>25%</b>
Affordable Rent	8%	28%	13%	0%	<b>49%</b>
Social Rent	0%	0%	23%	8%	<b>21%</b>
<b>Total %</b>	<b>17%</b>	<b>46%</b>	<b>28%</b>	<b>8%</b>	<b>100%</b>

Table 3 - Proposed Affordable Housing Mix to be secured by S106

8.4.6. Table 3 (above) sets out the mix that has been agreed with the AH Officer. As well as stating the percentage of each tenure, it describes the percentage of each unit size within each tenure, which ensures that an adequate mix will be provided. The mix is considered to take account of:

- The need to maximise the affordability of larger family properties, including the provision of 3&4 bed units in the Social Rent tenure;
- Maximises the Social Rented units and Affordable Rented units;
- First Homes Cap, which means it is likely that only 1 bed units would meet this criterion;
- The need to maintain some 1 bed units for other tenures, particularly affordable rent;
- The need to provide shared ownership units which are generally aimed at first time buyers so should be smaller units.

8.4.7. Subject to securing the above mix within a Section 106, it is considered that the proposal would have an acceptable level and mix of affordable housing in accordance with policies H3 and H9 of the Local Plan (2020-2039).

## 8.5. Community Building

8.5.1. Policy INF4 'Community Facilities' of the Local Plan recognises the importance of community facilities as they contribute to the well-being and quality of life of residents.

8.5.2. The promotion of healthy and safe communities is also given much emphasis in the NPPF at Chapter 8. Paragraph 96 states:

*'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mix-used developments, strong neighbourhood centres,*

*street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.*

- b) Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high quality open space, which encourage the active and continual use of public areas; and*
- c) Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*

8.5.3. Paragraph 98 of the NPPF further reads:

*'To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should, inter alia:*

- 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;*
- e) Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services'*

8.5.4. The proposal includes the provision of a community building. This is a requirement of Local Plan site allocation policy DS8, which also requires the community building to be capable of accommodating early years education in accordance with local need as identified from SCC and other Class E or F uses responding to the needs of the locality.

8.5.5. Owing to the fact that this is an outline scheme, there has been limited information provided regarding the Community Building. However, the description of development, and the planning statement, sets out that the scheme would provide a Class E/F Community Building of up to 929sqm. The provision of this building would complement and enhance the housing development and provide benefits to the health and well-being of future occupiers of new dwellings as well as the other residents in the surrounding area.

8.5.6. The provision of a Community Building is considered to be in line with the aims of the NPPF and Local Plan policies DS8 and INF4. Given the scale of the development, it is considered necessary to ensure that the proposed community building is delivered by securing it within a S106 Agreement.

## 8.6. Gypsy/Traveller Site Provision

- 8.6.1. Policy H5, 'Gypsies, Travellers and Travelling Showpeople Accommodation' of the Local Plan seeks to secure the delivery of new pitches on Gypsy and Traveller sites as part of the development of housing sites with a capacity exceeding 100 dwellings where this is specified in the allocation. Sub paragraph 7 of this policy sets out the site requirements.
- 8.6.2. National guidance on the determination of planning applications for new gypsy and traveller sites is set out in Policy H of the Planning Policy for Traveller Sites (PPTS).
- 8.6.3. The key Development Plan policies are listed above. PPTS policy H (paragraph 25) states that Local Planning Authorities should '*very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan*'.  
*very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan*'.
- 8.6.4. The application site is closely related to the built-up area of Bookham, and it is noted that site allocation policy DS8, seeks the provision of at least 3 gypsy and traveller pitches on an area of 0.2ha. When the application was originally submitted, the plans indicated the gypsy and traveller area would be located at the southern end of the site – separate from the remainder of the development - and accessed directly off Water Lane. However, in response to the Examining Inspector's report which identified the southern end of the site as remaining within the Green Belt, the gypsy and traveller area was relocated to the southeastern part of the site and now sits alongside the proposed community building and new housing. Access to the gypsy and traveller area will be taken off Lower Road and shared with the remainder of the development. The detail regarding the precise layout of the individual gypsy and traveller pitches would be secured at Reserved matters stage. A condition can be recommended to ensure that the gypsy and traveller area will have connection to utilities.
- 8.6.5. In summary, the on-site provision of the 0.2 ha of the site for occupation by gypsy and travellers accords with the aims of the site allocation DS8 and with policy H5 of the Local Plan 2020-2039. A planning obligation will be included within the S106 Agreement in order to secure the provision of this area within the development site.

## 8.7. Impact on Character of Area

- 8.7.1. Paragraph 135 of the NPPF states that planning policies and decisions should ensure that developments:
  - a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
  - b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

- c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) 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.

- 8.7.2. Paragraph 136 of the NPPF continues: 'Trees make an important contribution to the character and quality of urban environments... Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained where possible'.
- 8.7.3. Policy EN4 (Character and Design): The aim of this policy is to continue this tradition of high-quality architecture and urban design, respecting existing local character and introducing new styles sensitively and only where appropriate. The policy applies to all types of development and is applicable to all development proposals
- 8.7.4. Bookham NDP policies BKEN1, BKEN2 and BKH2, briefly summarised, seek to ensure that new development is: compatible with its surroundings in terms of character and building relationships and; pays regard to existing trees and other vegetation.
- 8.7.5. The site is located within the Ockham and Clandon Landscape Character Area as defined in the Landscape SPD (2013). The key characteristics of this area include:
  - small to medium size, irregularly shaped fields are enclosed by hedges and shaws
  - Narrow hedgerow lined roads, sometimes slightly sunken, give few views and a strong sense of enclosure
  - Large block of woodland, including areas of Ancient Woodland, notably at Bookham Common SSSI and
  - A large proportion of the character area is within the built-up area.
- 8.7.6. The Landscape Character Area is characterised by a mix of agricultural areas with large blocks of woodland abutting the north of Fetcham and Bookham.
- 8.7.7. The majority of the easternmost part of the site (where the development would be located) is to the rear of existing properties on Little Bookham Street (to the east) and at Fox Lane (to the north). At present, the site consists, largely,

of an open field bordered by a mature area of woodland to the west and the existing housing to the north and east. There would be a change in character of the eastern part of the site from undeveloped greenfield land to a residential, mixed-use development which would result in some degree of harm to the existing rural character of the area. However, that change has been accepted by the Council and the Local Plan Inspector by the allocation of the site for development in the new Local Plan. What it is necessary to consider is whether the layout proposed is acceptable in character terms as, whilst an outline application, the submission contains parameter plans relating to land use, building heights, green infrastructure and access and movement as well as an illustrative masterplan which shows one way in which the development could be provided on the site.

- 8.7.8. The application is in outline form with only the means of access to the site for consideration at this stage. The site access would be taken directly off Lower Road to the west of the existing mini roundabout and would replace the existing access to No. 330 Lower Road (the dwelling to be demolished). This access would need to be widened to provide sufficient visibility splays for vehicles emerging from the site. The widening of the access would not cause any significant harm to the character of the area. No. 330 Lower Road would be removed to make way for the line of the access road. The removal of this building would not give rise to harm to the character of the area.
- 8.7.9. The illustrative masterplan shows how 200 dwellings, a community building, gypsy and traveller area, SANG car park, LEAP and open space could be achieved on the site. The majority of the built development would be situated behind existing development that fronts Lower Road and Little Bookham Street. The buildings at the front of the site alongside the access road off Lower Road, would be set back from the site frontage with a sweeping roadway and landscaping to the fore that creates a softened entrance into the development. There would be scope for new soft landscaping including trees to be introduced at the 'front' the site, i.e. inside the site entrance. The layout here is shown as being relatively low-density and therefore having limited impact on views from Lower Road.
- 8.7.10. Moving into the site, the illustrative masterplan shows that there would be the Gypsy and Traveller area to the east of the access road alongside the Community Centre. Beyond that, as the site turns to the north is where the larger proportion of the residential development would be located. Some dwellings would front the internal access road together with other groups of buildings arranged in an informal layout in small cul-de-sacs. The layout incorporates a mix of dwelling types – from detached to semi-detached, terraced and flatted units and a range of plot sizes. The illustrative masterplan shows pockets of public open space/verges throughout the development and there would be scope within the site – both alongside some stretches of the access road and between buildings, to introduce additional tree planting. Officers are satisfied that the illustrative masterplan (as contained in the Design & Access Addendum) shows that 200 dwellings, the community building, the gypsy and traveller pitches, SANG car park, LEAP and open space could be satisfactorily achieved on the eastern part of the site without having a cramped or overdeveloped appearance.

- 8.7.11. The green infrastructure parameter plan shows the provision of a buffer to the areas of retained woodland within and around the site. These areas will make a significant contribution to the setting and character of the development as a whole. The Tree Officer has not raised any concern regarding the proposal and has commented that application will retain a large number of trees ensuring the site will be in keeping with the area. She is satisfied that the applicant's arboricultural impact assessment is in line with best practice.
- 8.7.12. The building heights parameter plan shows that the residential development nearest to Lower Road would be limited in height to two storey and the community building and gypsy and traveller area (also on this part of the site) would be limited to single storey in height. Beyond this, on those parts of the site that are set much further back from Lower Road and behind existing properties on Little Bookham Street and Fox Lane, building heights would be largely 2.5 storey with some areas of three storey. Whilst the majority of neighbouring properties on Little Bookham Street and Fox Lane are two storey in height, it is considered that the proposed development, which would be adequately set back and to the rear of those properties and set beyond a treed buffer, would not cause any significant harm to the character of the surrounding area. The three storey buildings at the northernmost end of the site would be set against a treed backdrop on both their northern and western sides and would also benefit from further tree planting on their eastern side – all of which would help to soften their appearance. A further band of three storey buildings would extend across the width of the site between two areas of retained woodland. They would be set well away from any of the neighbouring properties and would not cause any harm to the character of the surrounding area.
- 8.7.13. With regards to the western and southern parts of the site, these would be largely undeveloped with only associated development to serve the SANG such as the provision of a car park which would be at the southern end of the built up area of the site, a LEAP play area and updates to the footpath to access the SANG. Based on the illustrative masterplan, these areas are considered to be appropriately located on the site and, with the provision of the car park and footpath updates, enhance the accessibility for the wider benefit. Full details would be considered at reserved matters stage though it is considered the masterplan indicates that the overall character of the development would be strongly enhanced by these features.
- 8.7.14. On the basis of the submitted parameter plans and the illustrative masterplan and landscape masterplan, officers are satisfied that the proposed development represents a high-quality design that would integrate well with the existing character of the area and incorporates a high degree of open space and landscaping that would further enhance the development. As such, the proposal would not give rise to any significant harm to the character and appearance of the site or the surrounding area. As such, the proposal complies with the aims of Local Plan policy EN4, and with Bookham NDP policies BKEN1, BKEN2 and BKH2 and the advice set out in the NPPF.

## 8.8. **Impact on Neighbouring Residential Amenity**



- 8.8.1. Point 5 of Emerging Policy EN4 explains that proposals should ensure the amenity of future occupiers, or those currently occupying adjoining or nearby properties is not significantly affected or have an unacceptable impact on the residents of the surrounding area. If the amenity effects of the proposed development can be made acceptable by mitigation measures, then the Council will seek these measures.
- 8.8.2. The nearest neighbouring properties to the site include the houses to the east on Little Bookham Street, those to the north on Fox Lane, to the south on Lower Road including those in The Martingales, and the houses on Water Lane.
- 8.8.3. At this stage, only outline permission and access arrangements are to be fully assessed with all other matters to be considered at reserved matters stage.
- 8.8.4. As a result of the amended plans, only pedestrian and cycle access to the site would be taken off Water Lane. As such, the residents of Water Lane would be unlikely to experience any significant impact, particularly in terms of vehicle noise or disturbance from future occupiers and built form and use of the SANG space and community facilities, due to the considerate layout of the development.
- 8.8.5. In terms of those properties nearer to the built-up part of the site, there would be a change in the relationship given that the use would change from open fields to a residential development as well as community use and use of the site by the public in accessing the SANG. Vehicle movements in and out of the site off Lower Road would be greater than the existing arrangement and there would be vehicles moving around within the confines of the site itself – something that currently does not occur. However, the level of traffic generated would be typical of the built up area and the layout is such that the movements would be located at a sufficient distance from existing properties and any impact would not be considered to amount to harm.
- 8.8.6. The building heights parameter plan shows that the south eastern end of the site, which is bordered by a number of houses in The Martingales and on Little Bookham Street, would be limited to two storey with some corner elements being a maximum height of 2.5 storey. The community building and gypsy and traveller site would be single storey in height. This restriction on building height on this part of the site takes account of the close relationship of houses in The Martingales which are also two storey. Beyond the outer edge of The Martingales, building height would rise to 2.5 storeys with some elements of 3 storey. This corner of the development would be distant from any neighbouring properties and screened to both the west and east by retained woodland.
- 8.8.7. Moving further into the main built up area, a band of three storey buildings would then extend across the width of the site between the wooded areas to the west and east, stepping back down to 2.5 storey for the majority of the boundary with properties on Little Bookham Street. The illustrative landscape masterplan demonstrates that there could be scope for the introduction of new planting and the reinforcement of existing soft landscaping on this boundary and buildings could be set off the boundary at acceptable separation

distances from the neighbouring properties. The building heights parameter plan shows an area of three storey properties in the far north eastern corner of the site. Here there is a notable gap to the nearest neighbouring properties on Fox Lane and an established belt of trees to the north and west, both of which would be retained. The illustrative landscape masterplan shows that it would be possible, on the basis of the indicative layout, to increase the depth of the soft landscaped buffer on this part of the site boundary with the properties on Little Bookham Street. This would help to soften the edge of the development when viewed from the neighbouring residential properties. Buildings could be set back from the edge of the site boundary and arranged in such a way as to avoid any significant harm to the amenity of neighbours.

- 8.8.8. On the basis of the submitted parameter plans and the illustrative masterplan, officers are satisfied that the proposed development could be accommodated within the site without causing significant harm to the amenity of neighbours. Furthermore, the provision of the community building and SANG would be accessible for existing residents of the surrounding area. As such, the proposal is considered to comply with policy EN4 in this regard.

## 8.9. **Future Occupiers' Amenity**

- 8.9.1. Policy EN4(s) of the Local Plan sets out that new developments should ensure that new development should provide a satisfactory environment for future occupiers.
- 8.9.2. Policy H10 (Standards for Accessibility, Water and Space) explains all new dwellings including conversions will be required to provide sufficient internal space which meets the National Described Space Standards. This policy also requires that on development sites of 10 or more dwellings, a minimum of 10% of the properties should meet Building Regulations standard M4 (2) 'accessible and adaptable dwellings'. Additionally, on sites of 20 or more new dwellings at least 5% of the new dwellings will be required to meet Building Regulations Standard M4(3) 'Wheelchair Accessible'
- 8.9.3. Local Plan policy INF5 sets out that new residential development should make provision for gigabit-capable broadband connections, unless it is demonstrated that this is not practical.
- 8.9.4. Securing good design is an integral part of the Government's National Planning Policy Framework (NPPF).
- 8.9.5. Paragraph 135 advises that planning policies and decisions should aim to ensure that developments, inter alia: i Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; ii. 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.

- 8.9.6. The indicative masterplan shows one way in which the development could be carried out. This plan demonstrates that the quantum of development being sought could be achieved in a manner which provides a satisfactory living environment for future occupants. The exact details of the dwellinghouses, including their layout, siting and relationship to one another would be dealt with at reserved matters stage. Each property would be subject to compliance with the Nationally Described Space Standards. The indicative masterplan shows that parking could be provided alongside each dwelling and that parking courts could be provided adjacent to flatted buildings. Subject to conditions securing the compliance with policies H10 and INF3, the proposal is considered to comply with the Local Plan (2020-2039) in this regard.

#### Noise

- 8.9.7. The application site is located to the north of Lower Road and Water Lane and west of Little Bookham Street.
- 8.9.8. The application is supported by an Environmental Noise Assessment Report prepared by Sol Acoustics which seeks to assess the suitability of the site for the proposed residential development on the basis of existing background noise levels. Consideration was also given to the noise impacts of measures to mitigate summertime overheating of the new properties. The report concludes that appropriate indoor ambient noise levels could be achieved in habitable rooms and that noise levels in garden areas across the development would also be acceptable.

The Noise Report was subject of consultation with the Council's Environment Health Department who advise that there are no adverse noise impacts at the site. As such, officers are satisfied that the future occupiers would not experience significant harm to their amenity by way of noise disturbance.

#### Air Quality

- 8.9.9. The applicants submitted an Air Quality Assessment in support of the application prepared by Redmore Environmental Limited. The report advises that air quality could be impacted during demolition, earth works and construction and as a result of vehicle emissions following occupation of the development.
- 8.9.10. It is considered that a planning condition seeking details of the Construction Environment Management Plan for the site would ensure appropriate mitigation for the development. The air quality impacts of the development associated with vehicles travelling to and from the site were not found to be significant
- 8.9.11. The Council's Environmental Health Department has assessed the findings of the applicant's Air Quality assessment and drawn the following conclusions:

#### Construction impacts:

*The site is a greenfield location and there will be no significant demolition.*

*Therefore I can confirm that normal construction practices are accepted as being sufficient to suitably mitigate dust emissions and that no material impacts are considered likely to adversely effect local Air Quality.*

Operational impacts:

*Dispersion modelling was undertaken in order to predict pollutant concentrations at sensitive locations both with and without the development in place. Results were subsequently verified using local monitoring data. I-transport have used industry standard TRICs modelling to predict future operational traffic impacts. TRICs is based on an underlying data set of thousands of transport surveys for hundreds of different development types. This modelling data is used to provide a suitable industry standard assessment of future traffic volumes that will be created by the development. Redmore Environmental used the data from this assessment to develop their air quality modelling to assess the future impacts. The conclusions of the applicant's report is as follows: Review of the dispersion modelling results indicated that impacts on annual mean NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations as a result of exhaust emissions associated with traffic generated by the were predicted to be negligible at all sensitive receptor locations.*

- 8.9.12. On the basis of the comments from Environmental Health, officers are satisfied that air quality issues are not a constraint to the proposed development.

**8.10. Infrastructure Delivery**

- 8.10.1. Local Plan (2020-2039) policy D1 sets out that new developments must contribute towards the delivery of infrastructure facilities and services – the includes the provision of mitigation to avoid any substantial cumulative effects on the existing infrastructure services. Sub paragraph 2 of this policy states that *the Council will seek planning contributions to ensure the necessary infrastructure to support development is delivered using two main methods:*

- *The Mole Valley District Council Community Infrastructure Levy; and*
- *Section 106 Agreements/contributions or Planning Obligations to ensure that all new development meets the on and off-site requirements that are made necessary by and related to any proposed development.*

- 8.10.2. The proposed development of up to 200 dwellings would inevitably result in the increased need for local facilities, such as medical provision. Other infrastructure such as education provision has also been reviewed for its capacity taking into account the additional households associated with the proposal.

Education

- 8.10.3. SCC Education have reviewed the details of the scheme and have advised that there is sufficient education provision in the area to accommodate the

additional pupil yield anticipated from this development. As such, the County Council is not seeking the provision of any additional school places as a result of this development.

#### Healthcare

- 8.10.4. The NHS Surrey Heartlands Integrated Care Board (ICB) were consulted on the detail of the application. The exact housing mix of the development is not expressly specified within the supporting information given the outline stage of the proposal, however, the ICB have assumed that there will be an additional 345 persons who will require the use of local healthcare infrastructure.
- 8.10.5. Following the original consultation response, clarification has been sought as to how the ICB came to that assumption. It has been set out that the ICB uses a SIDM Health Demand and Cost Estimation Module, that uses data including Housing Need Surveys, the 2011 Census and Surrey Healthcare data.
- 8.10.6. When considering the impact of new homes and increased patient numbers the ICB has considered infrastructure needs at both individual practices and primary care networks (PCN) – this application falls within the Leatherhead PCN with the closest affected GP premises being, Fairfield Medical practice and Eastwick Park Medical Practice.
- 8.10.7. Given the additional need for healthcare facilities as a direct result of this application, Surrey Heartlands have recommended a financial contribution of £191,991 to mitigate the impacts of the proposed development. It is therefore considered necessary to secure this contribution to be specifically used within the Leatherhead Primary Care Network via a Section 106 Agreement.
- 8.10.8. Surrey Police
- 8.10.9. NPPF section 8 ‘Promoting Healthy and Safe Communities’ at paragraph 96b) sets out that planning policies and decisions should aim to achieve healthy, inclusive and safe places which: *‘are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...’*
- 8.10.10. Surrey Police have requested a financial contribution of £7,000 for the installation of an Automatic Number Plate Recognition (ANPR) Camera near the site entrance, as this would be the most suitable location to serve the development and the wider community. The Policy have set out that the ANPR Cameras are used by police forces to (1) identify vehicles known to be used by criminals and disrupt their activity; (2) to gather intelligence and (3) to investigate crime.
- 8.10.11. The Police set out that the increase in population arising from the development could increase crime rates in the locality and that an ANPR would go some way to mitigating this in order to prevent crime.

8.10.12. The applicant has considered the request and confirms their agreement to pay the contribution. This will be secured via the accompanying S106 Agreement.

8.10.13. In summary, it is considered that subject to a financial contribution to support local healthcare and Surrey Police, the proposal would be acceptable in regards to funding infrastructure in accordance with policy DS1 of the Local Plan.

#### 8.11. **Impact on Wider Area**

8.11.1. Policy EN8 of the Local Plan explains within Mole Valley there are nationally and local landscape designations and a variety of non-designated local landscape types. Much of the North Downs and Greensand Hills are of national importance and form part of the Surrey Hills National Landscape. Fringing the SHNL is the local Area of Great Landscape Value (AGLV) designation.

8.11.2. There are no local or national landscape designations affecting the site. The Surrey Hills National Landscape is around 700m to the south of the site and is sufficiently distant from it to avoid being impacted by the proposed development.

8.11.3. The proposal is supported by a Landscape and Visual Appraisal (LVA) produced by HCUK Group Ltd which includes the following observations and conclusions:

*\* the proposed development parcel is contained by existing physical features of the Site; the central woodland belt to the west, the existing access track to the south and the tree-lined settlement edge of Little Bookham to the east and north-east.*

*\* The parameters plans for the Site demonstrates how the wooded framework of the Site will be retained and the mature belt will effectively provide a soft transition from the new settlement edge to the SANG / Country Park and surrounding countryside. The Proposed Development areas has a good relationship with the existing built-up fringe, yet is visually contained and will not give rise to any important levels of adverse effects and no landscape or visual constraints have been identified in relation to provision of up to 200 dwellings on the east part of the Site*

*\* The development of the eastern part of the Site will not lead to any further coalescence of settlements, due the relationship with the existing settlement edge of Little Bookham, where the existing conurbation will be enlarged. The change is considered to be an organic growth that is closely related to the existing settlement pattern, where built development will be contained by the strong framework of tree belts and woodland on Site and new woodland and native planting to the southern edge.*

*\* The proposed development areas are set back into the Site to form a building line relative to the existing property on Lower Road. Whilst small scale of tree removal is required to facilitate the development of the access,*

*a number of these trees are diseased and tree losses will be replaced and supplemented with a high quality landscape treatment to the access to positively enhance the character of Lower Road.*

*\* The provision of the SANG as a new Country Park will result in environmental and social benefits for the local community and new residents. The area proposed for the SANG (12.39ha) is over the minimum policy requirements of 10.3ha of SANG which is a further benefit.*

*\* The relocation of the gypsy and traveller pitches and access to the eastern part of the Site is a clear improvement on the submitted application. This removes the impact of changes resulting from land-take of the field, the visual intrusion of vehicles and negative effects on tranquility on areas to the south west of the Site near Water Lane.*

*\* Mitigation includes tree replacements, extensive tree planting and native scrub creation, environmental improvements to vegetation and habitats and retention of the field pattern, scale and wooded framework to mitigate effects on landscape character.*

*\* The nature of the change to the south west of the Site are now overriding beneficial and will further enhance the rural transition to Water Lane and the countryside beyond.*

*\* The proposed development is consistent with the requirements of site allocation DS8 and the proposals within the Green Belt (SANG car park and LEAP play area) will be of an appropriate scale and design that is sympathetic to the rural character.*

- 8.11.4. The allocation of the site for residential development, a community building , gypsy and traveller pitches, SANG (and car park) and public open space, landscaping, surface water drainage, anticipates that there would be a change in character of the site. The development would sit alongside existing residential properties on Lower Road, The Martingales, Little Bookham Street and Fox Lane and would therefore be seen as an extension of the existing built-up area.
- 8.11.5. The Land Use Parameter Plan shows that the majority of the built form would be located to the rear of existing properties in Little Bookham Street and on Fox Lane and would be positioned between those buildings and a mature belt of woodland in the centre of the site. Development here would only be visible through gaps in the building line on the nearby streets and from the public footpaths within the site. The building heights parameter plan shows a mix of 2.5 and 3 storey buildings across this part of the site. Officers are satisfied that this density of development would be appropriate in this context. Buildings here would be viewed in the context of the neighbouring properties to the east and the mature tree belts to the north and west.
- 8.11.6. Only a relatively narrow 'wedge' of development at the southeastern corner of the site would be visible from Lower Road. Here the building heights parameter plan shows that the density of development would be relatively lower with buildings of 2 storeys in height and the community centre and

gypsy and traveller site limited to single storey in height. The illustrative masterplan shows buildings set back from Lower Road a similar distance to No. 330, allowing scope to introduce appropriate soft landscaping, including trees, inside the site entrance.

- 8.11.7. Officers are satisfied that the indicative site layout plan demonstrates that 200 dwellings, a community centre, gypsy and traveller pitches, SANG and SANG car park, public open space and surface water drainage arrangements could be arranged in such a way as to satisfy the criteria in policy DS8. The detail of the of scheme including siting and appearance of the buildings and the layout of the site, would follow as part of a Reserved Matters application.
- 8.11.8. The Green Infrastructure Parameter Plan shows that the majority of the site will remain undeveloped and that the SANG would abut the open countryside to the north west of the site. This parameter plan also shows the provision of a buffer zone between any new built development and the retained mature woodland in the centre of the site and a further 'finger' of woodland extending into the site on the eastern boundary. This will ensure the root protection areas of these trees is not impacted by the development.
- 8.11.9. The illustrative landscape masterplan demonstrates that there would be scope to provide a series of areas of open space throughout the development and to enhance planting within the new residential area as well as on the site boundaries and on those parts of the site that would not be developed.
- 8.11.10. The amendments to the scheme to relocate the community building and the gypsy and traveller pitches to the eastern part of the site and to provide only the footpath/cycle link off Water Lane and the LEAP and SANG car park in the Green Belt has resulted in significant reduction in the visual impact of the development, especially when viewed from the south-western boundary, off Water Lane. This part of the site now provides a soft, open and 'rural' edge between the new development and existing properties on Water Lane.
- 8.11.11. In summary, officers are satisfied that the proposed development in terms of land use and density/building height would be well-contained on the site between neighbouring development and retained mature tree belts and would not give rise to any significant level of harm to the character of the wider landscape.

#### 8.12. **Provision of publicly accessible open space and Locally Equipped Area of Play (LEAP)**

- 8.12.1. Policy EN10(3) 'Open Space and Play Space' of the Local Plan sets out that in order to address needs arising from development, the provision of publicly accessible open space and equipped play space will be required on site as part of any development scheme delivering 50 net dwellings or more. In the case of the application site, a Locally Equipped Area for Play (LEAP) is required on site.
- 8.12.2. Policy DS8 (12) states that any development of this site should, in addition to the country park/SANG, provide publicly accessible open space and equipped play space in accordance with the standards in policy EN10.



- 8.12.3. The proposal would make provision for public open space throughout the site together with an equipped play area located in the Green Belt, towards the south of the site, and close to the entrance/car park serving the SANG. Policy DS8 does not specify a minimum amount of open space to be provided as part of the development, however, officers are satisfied on the basis of the Green Infrastructure Parameter Plan and the illustrative masterplan, that a satisfactory amount of public open space and an equipped area of play could be incorporated within the scheme in addition to the SANG for the benefit of future occupiers and visitors.
- 8.12.4. The public open space and LEAP together with its long-term management, will be secured within the S106. On this basis the proposal is considered to comply with policy EN10 of the Local Plan and criteria 12 of policy DS8.

### 8.13. **Suitable Alternative Natural Green Space (SANG)**

- 8.13.1. Policy DS8 (criterion 6) requires the provision of a Country Park/SANG of a minimum size of 10.3ha incorporating walking routes, public car parking and measures for biodiversity enhancement, designed and implemented in accordance with Natural England guidelines.
- 8.13.2. The SANG has been required as the site lies within 4.8km of the Thames Basin Heaths Special Protection Area (SPA), and it has been ascertained within the Habitat Regulation Assessment submitted with the application and the Appropriate Assessment carried out by SCC that the absence of any avoidance or mitigation measures could have a negative impact upon the SPA through an increase in recreational disturbance caused by the increased number of residents within the 5km catchment of the SPA. Natural England have also expressed that the requirement of a high quality SANG will reduce the pressure on the Mole Gap to Reigate Escarpment SAC (Box Hill) and Bookham Commons SSSI. Further, as highlighted by Surrey Wildlife Trust, the application site lies to the south of Oaken Wood, a private woodland which has public footpaths within which can lead to trespassing within the woodland. SWT have set out the provision of the SANG would help reduce the likelihood of trespassing through the alternative walking routes.
- 8.13.3. The proposed SANG/Country Park would be 12.39ha and would be located on the western side of the development. It would include new walking and cycling routes, community food growing area, a community orchard and natural play spaces. Existing ponds would also be retained and enhanced with new walking routes, nature trails and a viewing platform. The existing tree belt to the centre of the site would be retained and would provide screening between the SANG and the residential development.
- 8.13.4. The Applicant has used the Natural England (NE) Guidance for SANGs (2021) to inform their proposal. Table 1 of the SANG Management Plan, which was updated following a site visit with NE, sets out the SANG Criteria and how the Preston Farm development meets such criteria. The Management Plan also sets out four objectives, which enables the developer to create and maintain a landscape that fulfils the SANG criteria from NE. The four objectives are as follows:

- Objective 1: Create and maintain natural, open and safe routes for informal recreation;
- Objective 2: Create and maintain structurally and diverse habitat within the SANG;
- Objective 3: Create and maintain visual and ecologically valuable waterbodies; and
- Objective 4: Maintain, and wherever possible, enhance the biodiversity value of the SANG.

8.13.5. In addition to the above, the Management Plan includes Long Term Management Costs and a Landscape Management Plan (LMP). The LMP expands on how the four objectives above will be met, including planting schedules and timing of tasks. The Management Plan sets out that the developer will be responsible for the initial enhancement works and management prior to the occupation of any dwelling, before handing it over to a competent authority or management company, who would then undertake the long-term management of the SANG. The legal agreement to facilitate the hand-over and secure the long-term management is to be included within the Section 106.

8.13.6. Natural England have been consulted on this application, and have engaged with the Applicant to amend the submitted Management Plan to ensure it meets the expectations and requirements of NE. Following the provision of the amended Management Plan (dated October 2024) to include full costings and ownership and maintenance arrangements, Natural England have confirmed that they have no objection subject to conditions and a Section 106 obligation to secure the long-term management and facilitate the handover of the SANG to the competent authority or management company. The consultation response from SCC Environmental Assessment Officer, also confirms that the mitigation proposed in the form of the new SANG would be sufficient so that the development would not give rise to likely significant effects on the Thames Basin Heaths SPA from additional recreation pressure.

8.13.7. Officers note the above and consider that the proposed SANG would provide a high-quality green space for future residents and the wider community to reduce the recreational pressure on the Thames Basin Heaths Special Protection Area (SPA), Mole Gap to Reigate Escarpment SAC (Box Hill) and Bookham Commons SSSI. Subject to conditions and S106, the proposal would accord with the requirements of policy DS8.

#### 8.14. **Highway and Parking Matters**

8.14.1. NPPF Paragraph 116 states, '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, following mitigation, would be severe, taking into account all reasonable future scenarios.'

8.14.2. Local Plan policy INF1 seeks to ensure that development makes adequate provision of off-street parking, servicing, vehicular access and egress and movements within the site.

8.14.3. Local Plan policy INF2 seeks to ensure that the level of parking provision in new developments has regard to developer requirements and also reflects the extent to which the site can be accessed by a range of transport modes.

8.14.4. The application is supported by a Transport Assessment produced by i-Transport and a supplementary document dated 5<sup>th</sup> November 2024 entitled 'Minor updates to access arrangements' (also produced by i-Transport) that accompanied the amended plans. The main findings of these documents are as follows:

- Suitable and safe vehicular access is proposed from Lower Road.
- Suitable and safe pedestrian and cycle access is proposed from Lower Road and Water Lane and pedestrian access from Fox Lane.
- Improvements to Water Lane (in terms of pedestrian and cycle access) can be safely maintained.
- Suitable and safe access is achievable to the three gypsy and traveller pitches from the proposed main access to Lower Road.
- The Access & Movement Parameter Plan shows that the proposal will provide permeability throughout the site and priorities active travel modes. Within the site, a network of footpaths, cycle paths and safe streets will be provided.
- A Travel Plan will be used to promote sustainable travel and the sustainable transport strategy provides appropriate opportunities to support travel by sustainable modes.
- The proposed development will not give rise to a significant or severe impact on the transport network in terms of capacity, congestion and highway safety.
- The cumulative impacts on the road network are acceptable.

8.14.5. The County Highway Authority (CHA) have assessed the supporting information and subject to conditions, improvements to the public highway and a completed legal agreement, they raise no objection to the scheme. The recommendations include:

S106 agreement

- Auditing Fee of the Travel Plan and sustainable travel vouchers for residents;
- Digital Demand Responsive Transport (DDRT) of £200k spread over a period of 5 years
- Car Club including two years free membership and £50 driving credit

Section 278 Works (Improvements to Public Highway)

- Construction of Access to Lower Road;
- Construction of pedestrian/cycle access to Water Lane;
- Upgrading the Preston Cross Bus Stops on Lower Road and the General Stores Bus Stops on Little Bookham Street (including bus shelters, pedestrian crossing facilities, Real Time Passenger Information)
- Provision of accessible raised kerbing to enable the comfortable boarding and alighting of passengers on these bus stops

- Provision of an information crossing point with dropped kerbs and tactile paving on Little Bookham Street to improve the walking route to the station and crossing between bus stops
- Improvements to the Public Rights of Way footpath 84 (including arrangement, alignment, landscaping, temporary alternative route provision, design and specification for the replacement of the existing bridge, legal mechanism to permit cycling on the footpath)

8.14.6. In providing the above recommendations, the CHA have made the following comments:

*'The County Highway Authority acknowledges that the proposed development will generate increased vehicular and pedestrian trips on the local traffic network, however the proposed upgrade to the existing public rights of way network can go towards creating safer routes to/from the site and the Demand Responsive bus service will promote sustainable modes of travel to/from the development In addition to this, the Travel Plan, Car Club space, EV Charging points and e-bike charging facilities will provide sustainable transport. The CHA do not object to the proposed development subject to the conditions'*

8.14.7. As the development is for more than 150 dwellings, Active Travel England (ATE) were consulted on the application. ATE aims to increase the number of local journeys that are walked, wheeled or cycled and ensure that new development considers active travel. In their response ATE directed the local planning authority to its standing advice, which encourages LPA Officers to use the Planning Application Assessment Toolkit within their response.

8.14.8. The applicant, within their Transport Assessment, has provided a populated toolkit which assesses the scheme against the criteria provided by ATE. Officers have reviewed this and are in agreement with the overall response. It is clear that active travel has been properly considered with the proposal being in a suitable location for residential development coupled with the highway improvements which seek to promote sustainable modes of transport.

#### Public Right of Way

8.14.9. There are two Public Rights of Way (PRoW) which cross the site (routes 76 and 84), running from the north of the site and along the western perimeter. Policy EN10(4) of the Local Plan requires that PRoW be protected from development and, where possible, new development enhance the existing network.

8.14.10. The PRoW running through the site are proposed to be maintained and enhanced as part of the development, with the improvements to the rights of way network connecting to Fox Lane providing the walking route to the north and the connection to Bookham Station. SCC Countryside Access have requested information regarding the improvements to the footpath, and following further discussions with the CHA, it has been considered that this

information can be conditioned as part of the S278 works (detailed above). Officers agree that the use of condition would be acceptable in this instance.

8.14.11. Taking into account the above, Officers are of the view that, subject to conditions and receipt of a satisfactory legal agreement to secure the measures set out the highway’s response, the proposal would be acceptable in relation to highway safety.

**8.15. Impact on Biodiversity**

8.15.1. Policy EN9 – (Natural Assets) advises where development proposals are likely to affect natural assets planning applications will be required to include an assessment of the impact of their proposals on native biodiversity, protected, otherwise endangered or vulnerable, species and habitats in line with the British Standard for Biodiversity: Code of Practice for Planning and Development BS42020.

8.15.2. The NPPF makes it clear at para 187 that: ‘Planning Policies and decisions should contribute to and enhance the natural and local environment by, inter alia: minimising impacts on and providing gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures’.

8.15.3. Paragraph 185(b) requires the promotion of ‘the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity’.

8.15.4. The application is supported by an Ecology Impact Assessment produced by Derek Finnie Associates. The assessment makes the following points in regard to the impacts, mitigation and enhancements of the scheme:

<b>Impacts</b>	<b>Mitigation &amp; Enhancements</b>
the development would result in the loss of approximately 6ha of species poor semi-improved grassland	<p>The grassland on the west side of the site will be retained and enhanced.</p> <p>The site will offer a range of habitats including wildflower meadows, marshy grassland, SuDS systems, orchard, hedgerows and standards trees. This will be subject to long-term sustainable management regime secured via the S106 Agreement.</p>
several individual trees would need to be removed to facilitate construction – mainly around the site access	<p>the majority of woodland within the site will be retained and enhanced</p> <p>a buffer would be retained between the built development and the</p>

	retained woodland blocks
the development may give rise to indirect impacts to the Thames Basin Heath SPA (which is within 5km of the site) through an increase in informal recreation	The western section of the site will be given over to the provision of a bespoke Suitable Alternative Natural Greenspace (SANG). The size of the SANG exceed the policy requirement. It would include the provision of a car park and a circular walk. This would ensure there is no adverse impact on the Thames Basin Heath SPA.
the potential indirect disturbance and displacement of reptiles is possible	To ensure no harm or injury to reptiles in the construction zone, a reptile mitigation strategy would be implemented focussing on limited translocation to the retained grassland to the west of the site prior to the commencement of site works. Log piles and hibernacula would be provided in this area.  The site will offer a range of habitats and improved opportunities for reptiles
there would be a localised increase in artificial lighting which could affect the potential for the site to be used by commuting and foraging bats  there is potential for indirect disturbance and displacement of breeding birds	Enhancement to the retained habitats in the west of the site together with the creation of new species-rich habitats would provide improved foraging for bats and birds. In addition, bird and bat boxes would be installed in retained habitats within the site and on the new dwellings.  The proposal would include dark corridors to facilitate bat movement and a site-wide lighting strategy through the use of sensitive lighting.

8.15.5. Surrey Wildlife Trust have reviewed the proposal and recommend conditions in relation to bats, amphibians, badger, birds and reptiles. Suitable conditions are set out in the recommendation below.

Watercourses within the site

8.15.6. The application site contains three ponds in the centre of the site and a number of drainage channels – one running into the site from Lower Road and another from Water Lane. There is also a drainage channel running through the centre of the site in a south west to north east direction which follows the line of the tree belt.

- 8.15.7. The geology of the land to the south of the site is chalk-based and representations have been made by Bookham Residents Association and third parties that the site contains chalk streams as a result of this because the direction of water flow into the site is from the south.
- 8.15.8. During the course of the planning application, Surrey Wildlife Trust queried the presence of chalk streams in the site. The Trust do not employ hydrologists so they sought the views of South East Rivers Trust (SERT) on the matter. SERT are of the view that chalk streams are present on the site although they have not provided a hydrological report of any new evidence to support their claim to that which was considered by the Inspector of the Local Plan.
- 8.15.9. SWT give weight to SERT's opinion on the presence of chalk streams and advise that confirmation of whether the watercourse in the site is fed from chalk bedrock may require a hydrological report.
- 8.15.10. SWT advise that if the LPA is minded to grant outline permission, CEMP and LEMP pre-commencement conditions be used and that details sought should under condition should include buffer protection between the built development and the drainage channels including during construction and operational phases of the development together with the treatment of any runoff to protect the habitat.
- 8.15.11. The applicant's ecologist advises that the key issue in determining the presence of chalk stream on the site is where the water/ flow within the site originates. In order for it to be classified as a chalk stream, the water must originate from a chalk source. The applicants advise that there is no hydrological connection such as a culvert between the chalk aquifer to the south of the site and the drainage ditch within the site. This means that any water flowing towards the site from the south comes in off Lower Road itself rather than flowing directly in from an existing watercourse. As such, the road network is a barrier to watercourses on the southern side of Lower Road.
- 8.15.12. The issue of chalk streams was discussed in depth during the preparation of the newly adopted Local Plan and at the Examination. Despite this, officers have yet to see evidence of chalk streams being present on the site. The following sets out a summary of the discussion regarding chalk streams during the preparation of the Local Plan:
- 1) At Regulation 18 Issues and Options stage in 2017, no comments were received from Natural England in relation to either Chalk Streams or the Preston Farm site. Chalk Streams were not mentioned by anyone and there was no response from SWT.
  - 2) At Regulation 18 stage in 2020 – The *Environment Agency* referred to Principle Chalk Aquifers in the district but made no mention of the Preston Farm site or chalk streams. *Surrey Wildlife Trust* supported the allocation at Preston Farm in principle. *Natural England* mentioned the Preston Farm site in terms of air quality and the SPA, but not in water-related terms. A non-specific site mention of water/aquifers was made, but there was still no confirmation or issue raised about Preston Farm, or Chalk Streams. They

commented: *“There are a few allocations that are spatially close to the SAC. Watercourses flow through these potential development locations and then onto the SAC. Please consider this as part of the potential hydrology impact pathway in the HRA and not just whether ponds that support great crested newt populations are connected to any deep aquifer from which abstraction might occur.”* Various comments were made on the presence of flooding, streams and ponds, including some references to Chalk Streams on the site, but nothing was verified and this was checked using available data in the preparation of the plan which did not have anything mapped or confirmed.

3) At Regulation 19 stage in 2021/22 – *Natural England* referenced site allocation DS8 in terms of air quality and the SPA, but did not mention Chalk Streams. Nothing was said which would indicate a lack of support for the site. The *Surrey Wildlife Trust* representation, also made on behalf of the Surrey Nature Partnership, made no reference to Chalk Streams and did not comment on site allocation DS8. The Environment Agency supported the Local Plan. The Council received no comments from the South East Rivers Trust (SERT) at this most crucial stage of public consultation.

- 8.15.13. Examination Document ED49c is a Council Note on the issue of chalk stream at the Preston Farm site. This document sets out the following comment from SWT on the issue of chalk streams at the Preston Farm site: they do not hold anything that would indicate the presence of a Chalk Stream, and any presence would need to be ‘ground truthed’ by a trained ecologist. They did indicate that there was a watercourse running parallel to the ponds which runs through the site and which appeared to be connected to a stream on Bookham Common. They noted as it was unnaturally straight, it was likely to be a drainage or overflow ditch, thus not a geological or naturally-formed feature.
- 8.15.14. When considering site allocation DS8, the examining inspector made the following comment in relation to the issue of drainage and chalk streams on the site: *‘Investigations do not indicate any risk to the Bookham Commons SSSI, nor identify any water-based priority habitat area, including chalk streams or Irreplaceable Habitats that would be adversely impacted. No persuasive evidence to the contrary has been presented to date, including from Natural England.’*
- 8.15.15. Whilst SERT has recently said they believe there to be chalk streams on the site, this claim has not been backed up with any hydrological evidence that would justify any further investigation into the matter. In addition, officers are mindful that DEFRA has recently confirmed it plans to shelve protection measures for chalk streams that were announced by the previous government.
- 8.15.16. In the absence of any new evidence over and above that which was discussed during the preparation of the new Local Plan, to demonstrate that chalk streams are present on the site, officers are satisfied that there is no material change in circumstances and they therefore draw the same conclusion as the examining inspector on this matter. In line with the advice of SWT, suitable CEMP and LEMP conditions are recommended including appropriate



treatment to protect the drainage ditches during construction and operational phases of the development.

#### 8.16. Biodiversity Net Gain

8.16.1. Biodiversity Net Gain is mandatory for all major applications submitted on or after 12th February 2024, as per Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

8.16.2. The Environment Act (2021) makes a provision for biodiversity net gain to be a condition of planning permission in England. Planning applications will need to demonstrate a 10% biodiversity net gain can be met. A biodiversity net gain plan must be submitted and must include:

- a) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat;
- b) the pre-development biodiversity value of the on-site habitat;
- c) the post-development biodiversity value of the onsite habitat
- d) any registered offsite biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development;
- e) any biodiversity credits purchased for the development

This sits alongside:

- a strengthened legal duty for public bodies to conserve and enhance biodiversity;
- new biodiversity reporting requirements for local authorities, and
- mandatory spatial strategies for nature: Local Nature Recovery Strategies or 'LNRS'

8.16.3. Policy EN9: Natural Assets of the Local Plan requires not only that the loss of biodiversity on development sites is mitigated but that there is also a net gain of at least 20%. Part 3 of this policy states that planning applications, ***other than the exemptions specified in the Regulations*** must be accompanied by a biodiversity statement showing a Biodiversity Gain Plan demonstrating a BNG of at least 20%.

8.16.4. Government guidance on biodiversity net gain - exempt developments – states that '*If a planning application for a development was made before day one of mandatory BNG on 12 February 2024, the development is exempt from BNG.*'

8.16.5. This application was validated on 22 January 2024 and therefore is not subject to BNG legislation or to the 20% BNG requirement of policy EN9 of the Local Plan.

8.16.6. Despite its exempt status, the application is supported by a Biodiversity Net Gain Report produced by Derek Finnie Associates which is based on the following assumptions:

- waterbodies will be retained and enhanced
- woodland within the site will be retained and positively managed

- grassland to the west of the site will be retained and enhanced
- species-rich meadow will be created by sowing seed
- wetland grassland will be created in the attenuation basins
- native trees will be planted throughout the scheme
- SuDS features will be created and will provide species-rich habitats

8.16.7. The BNG report advises that the development would be capable of delivering a net increase of habitat units equivalent to 22.19%.

8.16.8. Commenting specifically on the issue of BNG, Surrey Wildlife Trust advise that it is feasible that the proposal could provide habitat creation and enhancement. They recommend a pre-commencement condition to secure a Landscape and Ecological Management Plan or a Habitat Mitigation and Monitoring Plan (HMMP). A Landscape and Ecology Management Plan condition is recommended.

### 8.17. **Impact on Heritage Assets**

8.17.1. Section 16 of the NPPF states heritage assets are “an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.” It also states that LPA’s 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 assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.”

8.17.2. Furthermore, paragraph 212 of the NPPF advises, that Local Planning authorities when considering the impact of a proposed development on the significance of a designated heritage asset, the more important the asset, the greater weight should be given to the asset’s conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

8.17.3. Policy EN6 - Heritage Assets explains when conserving and enhancing designated and non-designated heritage assets, the Council will have regard to the impact of new development on their fabric, integrity and significance, and their settings.

8.17.4. The applicant’s Heritage Statement has been reviewed by the SCC Heritage Officer who has commented as follows:

*The entrance to the site is located within Little Bookham Conservation Area. No. 330 Lower Road does not make a positive contribution to the character and appearance of the conservation area. As such, the HEO does not raise any heritage concerns regarding the proposed demolition of this building. There are a number of listed buildings on Little Bookham Street. The wooded areas of the application site make a contribution to the setting of the listed buildings.*

*I have reviewed the revised scheme and remain of the opinion that, subject to reserved matters, the scheme will only result in a low level of less than substantial harm. The applicant has taken on board previous comments about a post and rail fence to make the site appear more green and rural (i.e. less urban) and reflect the vernacular character of the area. The design of the buildings at the entrance to the site will be highly important to ensuring the scheme does not result in further harm. I have suggested they look at giving these a farmstead type character (i.e. the buildings look like outbuildings rather than dwellings) so the illusion of the historic village character is better preserved. Again, I will be seeking orange/red tiles when the materials and designs are submitted. The applicant has already responded to these points.*

*My only reservation about the revisions is the proposed location of the community centre. Previously, this was in a location where it had a fairly minimal impact on the conservation area, but now will likely be visible from the highway. While this by itself is not an issue, the building is shown as quite large on the indicative plan and is described as up to 929sqm (it is in fact referenced as being at least 929sqm in the original D&A Statement). I am concerned that owing to its proposed scale it may form a dominant feature in views from Lower Road. I would strongly encourage the applicant to look at this early on to see how this, and the dwellings closest to the road, could be carefully designed to prevent any further harmful impact on the conservation area.*

*I have assessed the proposal in accordance with paragraphs 201 and 205 of the NPPF. I am of the opinion that the scheme will result in a low degree of less than substantial harm to the character and appearance of the conservation area, subject to reserved details. This low level of harm will need to be weighed against the provision of housing in Mole Valley. I am not of the opinion there are sufficient heritage grounds to refuse the application.*

- 8.17.5. The applicant had previously updated the Illustrative Landscape Masterplan to replace a proposed flint wall on the Lower Road boundary with a timber post and rail fence. The existing vegetated boundary to the listed buildings on Little Bookham Street would be retained as part of the scheme. It is accepted that the future design detail (which would form part of a Reserved Matters application) will need to respond to the character and appearance of the Conservation Area.
- 8.17.6. Paragraph 215 of the NPPF advises that where a development proposal would lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimal viable use.
- 8.17.7. The public benefits put forward by the applicant are set out in the table below, together with the weight that officers consider should be attributed to each benefit:

Public Benefit	Weight attributed
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Delivery of up to 200 homes on an allocated housing site in a highly sustainable location	<b>Substantial</b>
Provision of 40% affordable homes, in line with emerging Local Plan policy, with a mix suitable to the context of the Site and housing needs in the area	<b>Significant</b>
Provision of a new Country Park that will serve both the development, the community of Bookham, and the wider district of Mole Valley, with the inclusion of SANG that will facilitate other developments required in the plan period	<b>Substantial</b>
A community building (929sqm) which would support social objectives for the area by providing a new hub, with the potential for co-working facilities and other beneficial uses	<b>Significant</b>
Provision of up to 0.2 hectares of land for Gypsy and Traveller pitches, contributing to identified needs	<b>Significant</b>
Achievement of 20% Biodiversity Net Gain, which exceeds the existing and emerging requirement	<b>Moderate</b>
Economic benefits to the area relating to the construction process and additional spending in the local area by new residents after the Proposed Development is completed	<b>Moderate</b>
Provision of a network of new pedestrian and cycle paths to facilitate sustainable transport and recreation	<b>Moderate</b>
Provision of homes on a zero-carbon basis, with further sustainable measures to include fast electric vehicle charging points	<b>Moderate</b>

8.17.8. Taken together, the benefits of the proposed development are considered to significantly outweigh any low level of harm to the Little Bookham Conservation Area. As such, the proposal satisfies policy EN6 with regard to impact on listed buildings and the Conservation Area.

#### Archaeology

8.17.9. Local Plan policy EN6(4) sets out that outside of County Sites of Archaeological Importance and Areas of High Archaeological Potential, the results of a desk based archaeological assessment must be submitted with any development proposals for a site larger than 0.4ha.

8.17.10. The application is supported by an Archaeological Desk-Based Assessment produced by HCUK Group which seeks to determine the archaeological potential of the site and the significance of any relevant archaeological

heritage assets identified. The assessment is based upon an examination of digital data held by Surrey Historic Environment Record plus documentary research.

8.17.11. SCC Historic Environment Planning: Archaeology have been consulted on the application and have made the following comments:

*The red line boundary of the proposed development site shows it to be approximately 27.8ha. In line with Local Plan policy ENV50 and National Planning Policy Framework (para 200 and 201) the applicant has submitted an archaeological Desk Based Assessment produced by their archaeological consultants HCUK, dated January 2024. The Assessment aims to assess the potential for and significance of any archaeological Heritage Assets that may be present and the potential impact of the proposal on any such assets, so enabling decisions to be made on what further archaeological work may be required.*

*The Assessment provides an archaeological and historical baseline on which the site's archaeological potential might be assessed. It considers the proposed development site to have a generally low or moderate potential for the presence of Heritage Assets of archaeological significance.*

*The groundworks associated with the proposed development will result in the destruction of any Heritage Assets of archaeological significance that may be present. Given the extent of the site and in order to better define its archaeological potential, in accordance with Local Plan policy ENV50, and the National Planning Policy Framework (paras 200 & 201), further archaeological work is required to clarify the presence or absence of any Heritage Assets of archaeological significance.*

*The initial phase of work should comprise a programme of geophysical survey to aid the identification of any features of possible archaeological origin. The results of the survey will inform a trial trench evaluation that will aim to determine the location, date, condition and significance of any archaeological Heritage Assets that may be present, enabling any further mitigation measures that may be required to be determined.*

*In this instance, it is acceptable and proportionate for the geophysical survey and evaluation to be undertaken and their results submitted following the determination of the Outline application. However, the geophysical survey and evaluation should be conducted and their results submitted before the determination of any Reserved Matters application. This will ensure that the applicant is aware of the archaeological implications of the proposed development prior to the completion of the development design, allowing for the preservation of archaeological assets within the development design, as necessary. It will also help to provide the applicant with a clearer understanding of the potential costs and programme implications should further archaeological mitigation measures be required.*

*Further mitigation measures may involve the detailed excavation of any Heritage Assets found to be present and/or the monitoring of the development groundworks as they proceed.*

*The archaeological evaluation and geophysical survey will need to be defined by a Written Scheme of Investigation that has been submitted to and approved in writing by the Local Planning Authority. To ensure the required archaeological work is secured satisfactorily at this Outline stage, a condition is recommended.*

8.17.12. Officers consider that the recommended archaeology condition is appropriate and will adequately secure the additional required work. There is therefore no objection against the NPPF or policy EN6 in this regard.

#### 8.18. Sustainable Construction

8.18.1. Policy S2 of the Local Plan 2020-2039 states that in order to reduce carbon emissions from new buildings and the redevelopment/refurbishment of existing buildings, the Council will:

- a) require all new development to be zero-carbon ready
- b) encourage proposals to use electricity produced on site such as solar panels and heat pumps etc in addition to decarbonised grid electricity unless it is not practicable or could harm the amenity of occupiers and surrounding properties
- c) require developers of major new residential developments to make the development zero carbon – preferably on-site or through a carbon off-set fund administered by the Council and funding carbon reduction measures in Mole Valley, and
- d) seeking funding opportunities to retrofit the existing building stock.

8.18.2. Local Plan policy EN13 – Standards and Targets for combatting the climate emergency seeks to achieve sustainable development through the use of sustainable construction techniques, renewable energy creation and energy conservation. To achieve these aims, all new development is required to be zero-carbon ready (i.e. it should need to significant work to ensure that they have zero carbon emissions as the grid decarbonises). This means that the buildings should be ‘ready’ to produce zero-carbon emissions during their operational phase (i.e. not including construction). This refers to emissions associated with energy consumed in the operation of the space (e.g. heating/cooling, hot water and internal lighting and does not include the running of white goods etc).

8.18.3. The application has been supported by an Energy Statement prepared by Southern Energy Consultants which advises that the applicant is committed to delivering net zero carbon performance in all dwellings. The applicant intends to minimise energy consumption and carbon dioxide emissions at the point of demand, achieved through the installation of highly efficient fabric, ventilation and lighting systems together with the benefits of passive solar gains. The Energy Statement advises that a combination of air source heat pumps and solar photovoltaic panels in the scheme would deliver net zero carbon performance in all of the proposed dwellings.

8.18.4. An appropriate condition can be recommended to ensure that the proposal will be zero-carbon ready in accordance with policies S2 and EN13.

## 8.19. Sustainable Drainage

8.19.1. Paragraph 170 of the NPPF advises 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. Paragraph 181 continues: '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. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan

8.19.2. Paragraph 182 of the NPPF states that applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major developments should:

- a) take account of advice from the Lead Local Flood Authority;
- b) have appropriate proposed minimum operational standards; and
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.

8.19.3. Local Plan policy INF3 seeks to ensure that sustainable drainage schemes are implemented as part of all major developments.

8.19.4. The application site is located within Flood Zone 1 – an area with a low probability of flooding. There is a zone of surface water flooding running from south-west to north-east through the site which includes the three ponds and the drainage ditch/watercourse running through the woodland. All built development would be outside of the area of surface water flooding.

8.19.5. The application is supported by a Flood Risk Assessment (FRA) produced by Cannon Consulting Engineers. The proposals aimed at improving the quality and quantity of surface water run-off from the site include 1) the provision of a grassed attenuation basin at the northern end of the site from which water would be released to the watercourse within the site at greenfield rates. All surface water from the development would be directed towards this attenuation basin 2) a realignment of the watercourse that enters the site off Water Lane into a meander at the southernmost end of the site and the formation of a shallow basin in this area, and 3) landscaped bund features of a maximum height of 50cm above ground level to slow and interrupt the flow of surface water. The sustainable drainage proposals are also likely to incorporate a series of roadside swales, planted filter beds, tree pit 'gullies' (where rainwater is directed from roads and roofs to tree pits) and SuDS planters (capture rainwater runoff, filter it through layers of plants and a specially designed soil mix, and gradually release or absorb the water). The finer detail of the drainage proposals and the ongoing management of the drainage system can be secured by condition.

8.19.6. In regard to drainage proposals for the site, the LLFA has assessed the applicant's FRA and, subject to recommended planning conditions, they are satisfied that the proposed drainage scheme meets with the requirements of the NPPF, the accompanying PPG and non-statutory technical standards for sustainable drainage systems. On this basis, officers are satisfied that there is no policy conflict with regard to this issue.

## 8.20. Local Financial Considerations

8.20.1. Local Plan Policy D1: Infrastructure Delivery, advises the Council will seek planning contributions to ensure the necessary infrastructure to support development is delivered using two main methods:

- The Mole Valley District Council Community Infrastructure Levy; and,
- Section 106 agreements/contributions or Planning Obligations to ensure that all new development meets the on- and off-site requirements that are made necessary by and related to any proposed development.

8.20.2. The Community Infrastructure Levy places a mandatory charge on new residential and retail developments. The Council will publish an annual infrastructure list detailing the infrastructure projects or types of infrastructure which the Council intends will be or may be, wholly or partly funded by CIL.

## 9. Planning Balance

9.1. The Council currently has in excess of five-years of housing land supply and a Housing Delivery Test result (2023) of 78%. As such the presumption in favour of sustainable development does not apply.

9.2. The proposal would provide up to 200 no. dwellings together with a 0.2ha area for gypsy and traveller provision, on housing allocation site DS8 of the



Local Plan. This would contribute to the Council meeting its housing land supply target and providing for the needs of gypsy and travellers and is therefore given significant weight in the planning balance. 40% of the new homes (80 in total) would be affordable properties. The proposal has been assessed against the criteria in policy DS8 and has been found to be fully compliant. This also attracts significant weight.

- 9.3. The development would provide social and environmental benefits through the provision of a community building, public open space, including a sizeable SANG for recreational use of the future occupiers as well as the wider existing community, footpath and cycleway provision and a Locally Equipped Area of Play. Significant weight is also attributed to these elements of the proposal.
- 9.4. Turning to the economic dimension of sustainability, the scheme would provide construction jobs and some local investment during its build out, as well as longer term expenditure in the local economy. Moderate weight should be afforded to this benefit.
- 9.5. The development would contribute towards local infrastructure in the form of a financial contribution towards healthcare facilities and Surrey Police. This is given moderate weight.
- 9.6. Officers are satisfied that the parameter plans take account of the site's characteristics and setting and that no significant harm would arise to the character of the area or the wider landscape.
- 9.7. Officers are also satisfied that the proposal would be accommodated on the site without causing significant harm to the amenity of neighbouring residents or future occupiers of the development. The reserved matters application would contain full details of the layout, appearance and scale of the development.
- 9.8. The proposal is considered to be acceptable in terms of highway safety and sustainable drainage.
- 9.9. Subject to recommended conditions, there are no objections with regard to the impact of the proposed development on protected species. Whilst there has been some debate during the course of the application concerning the presence or absence of chalk streams on the site, no new evidence has been submitted by third parties or consultees over and above that which was discussed during the preparation of the new Local Plan, to demonstrate that chalk streams are present within the site. Despite BNG not being mandatory for this application, the applicants advise that the proposal is capable of delivering a net increase of habitat units equivalent to 22.19% and Surrey Wildlife Trust acknowledge that the proposal would provide habitat creation and enhancement.
- 9.10. On the basis of the above, it is considered that the scheme accords with the development plan as a whole and represents sustainable development in line with the Framework.

## **10. Recommendation**

**RECOMMENDATION: A: Subject to receipt of a satisfactory legal agreement by Wednesday 28<sup>th</sup> March 2025 or any other such date as agreed in writing by the Deputy Chief Executive and Executive Head of Service (Planning and Place), to secure the provision of :**

- (1) a country park (SANG) and associated management plan**
  - (2) provision of public open space and a Locally Equipped Area of Play (LEAP)**
  - (3) 80 on-site units of affordable housing**
  - (4) Class E/F Community Building**
  - (5) a Health Care Contribution of £191,991 to the Integrated Care Board to be used towards the provision of health care facilities within the Leatherhead Primary Care Network or successor body**
  - (6) an area of 0.2 hectares for the delivery of gypsy and traveller pitches**
  - (7) prior to first occupation, provision of 1 electric car club vehicle and 1 electric vehicle parking space within the site. Car club parking space to be provided with a fast charge electric vehicle charging point. The car club to be promoted as part of the sales and marketing of the development. 2 years free membership of car club and a £50 driving credit for all new residents upon each occupation. Vouchers to be offered to multiple residents at the same address.**
  - (8) a Travel Plan plus an auditing fee of £6,150 and sustainable travel vouchers for the new residents**
  - (9) an indexed-linked sum of £40,000 per annum over a period of five years – a total contribution of £200,000 – to be paid to the County Council for the provision of a weekly Digital Demand Responsive Transport (DDRT) bus service which will include evenings and weekend services**
- \* SCC to provide the Demand Responsive Bus Service using the contributions paid towards it with the service to commence within six months of the first payment**
  - \* SCC to monitor the usage of the Demand Responsive Bus Service annually to help inform the routing and timetable of the Bus Service**
  - \* SCC to covenant that if the SCC shall not have expended or committed to be spent the Demand Responsive Bus Service Contribution within one calendar year from the date of the last payment made then SCC shall return the contribution sum to the developer**
  - \* all financial contributions due to the highway authority to be index**

linked using the prevailing Retail Price Index (RPIX) from the payment date to the date of any resolution to grant planning consent, and

\* all fare box revenue for passengers travelling to/from the housing development for a 5 year period from first provision of the service is to be returned to the developer on an annual basis (i.e. the developer takes on the risk of the revenue element of funding the service)

(10) a financial contribution of £7,000 to Surrey Police for the installation of 1 ANPR camera near the site entrance

planning permission be GRANTED subject to the conditions set out below

OR

**RECOMMENDATION: B:** In the event that a satisfactory legal agreement is not received by the above date or any other such date as agreed in writing by the Deputy Chief Executive and Executive Head of Service (Planning and Place), planning permission be REFUSED for the appropriate reasons.

**Conditions:**

1. Approval of details of the layout, scale, external appearance of the buildings and the landscaping of the site (hereinafter called the 'reserved matters') shall be obtained from the Local Planning Authority in writing before any development is commenced and carried out as approved. Plans and particulars of the reserved matters referred to above, shall be submitted in writing to the Local Planning Authority before the expiration of three years from the date of this permission. The development hereby permitted shall be begun before the expiration of two years from the date of approval of the last of the reserved matters to be approved.

Reason: To comply with Section 92(2) of the Town and Country Planning Act 1990 as amended by Section 51(2) of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out and completed in all respects strictly in accordance with the submitted documents and plan number(s):

BMD.23.0069.DR.P002 Rev P5 (Parameter Plan - Land Use)  
BMD.23.0069.DR.P004 Rev P5 (Parameter Plan - Access & Movement)  
BMD.23.0069.DR.P005 Rev P5 (Parameter Plan - Building Heights)  
BMD.23.0069.DR.P003 Rev P5 (Parameter Plan - Green Infrastructure)

contained within the application and no variations shall take place.

Reason: To accord with the terms of the submitted application and to ensure minimal

impact on local amenity and the environment in accordance with Mole Valley Local Plan (2020-2039) policy EN4.

3. Before any development commences on site, including demolition, details of the phasing of the development hereby permitted shall be submitted to and approved in writing by the Local Planning Authority. The development shall then be carried out in accordance with the approved phasing plan.

Reason: In the interests of the visual amenities of the locality in line with Mole Valley Local Plan policy EN4.

4. No part of the development shall be commenced unless and until the proposed vehicular/cycle/pedestrian access to Lower Road has been constructed and provided with visibility splays in general accordance with approved plan Drawing No. ITB8170-GA-029, by the Local Planning Authority. Thereafter the visibility splays shall be kept permanently clear of any obstruction over 0.6 high.

Reason: The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to satisfy policy INF1 of the Mole Valley Local Plan 2020-2039 and the advice in the NPPF.

5. No part of the development shall be first occupied unless and until the proposed pedestrian /cycle access to Water Lane, the associated footway and informal pedestrian crossing on Lower Road have been constructed and provided with pedestrian inter-visibility zones in general accordance with the approved plan Drawing No. ITB8170-GA-005 Rev L by the Local Planning Authority. No obstruction to visibility between 0.6m and 2m in height above ground level shall be erected within the area of such splays.

Reason: The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to satisfy policy INF1 of the Mole Valley Local Plan 2020-2039 and the advice in the NPPF.

6. Before any of the operations hereby approved are commenced on site of the new development, including demolition, a scheme of works on the public highway shall be submitted to and agreed in writing by the Local Planning Authority. Thereafter the scheme shall be constructed prior to first occupation of the development. These works shall include:

- Upgrading the Preston Cross bus stops on Lower Road and the General Stores bus stops on Little Bookham Street with bus shelters, accessible pedestrian crossing facilities and Real Time Passenger Information (RTPI) with sufficient power supply in both directions.
- Accessible 125mm-140mm raised kerbing for a length of 9m to enable the comfortable boarding and alighting of passengers on these bus stops,
- Provision of an informal crossing point with dropped kerbs and tactile paving on Little Bookham Street to improve the walking route to the Station and crossing between bus stops

Reason: The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to satisfy policy INF1 of the Mole Valley Local Plan 2020-2039 and the advice in the NPPF.

7. Prior to commencement of development hereby permitted, excluding demolition, a scheme for the provision of connection to and proposed improvements of Public Rights of Way footpath 84 in accordance with the principles shown on Drawing ITB8170-GA-027 shall be submitted to and approved in writing by the council including:

- General arrangement, alignment, landscaping, surfacing, and, where necessary, appropriate countryside furniture.
- The temporary closure and alternative route provision (where necessary) of the right of way during construction works
- The design, specification and Approval In Principle for replacement of the existing bridge carrying the right of way
- The proposed legal mechanism to permit cycling on a public footpath should be either via a footpath dedication under the Highways Act 1980 as a bridleway (permitting cyclists and horses usage) or via Cycle Track Order.
- An upgrade of the rights of way network to mitigate the increased usage related to the proposal to be carried out via a S278 agreement with SCC.

Thereafter, the approved details shall be implemented prior to the occupation of any phase of the development.

Reason: To ensure the provision of connections to Public Rights of Way and improvements to those footpaths in accordance with policy INF1 of the Mole Valley Local Plan 2020-2039 and the advice in the NPPF

8. No development, including demolition works, shall commence until a Construction Transport Management Plan (CTMP) has been submitted to and approved in writing by the Local Planning Authority. The CTMP 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 (including measures for traffic management)
  - (e) provision of boundary hoarding behind any visibility zones
  - (f) HGV deliveries and hours of operation
  - (g) measures to prevent the deposit of materials on the highway
  - (h) on-site turning for construction vehicles
  - (i) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
  - (j) no HGV movements to or from the site shall take place between the hours of 8.30 and 9.15 am and 3.15 and 4.00 pm nor shall the contractor permit any HGVs associated with the development at the site to be laid up, waiting, in (Lower Road, Little Bookham Street and Rectory Lane) during these times .

Only the approved details shall be implemented during the construction of the development

Reason: The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to satisfy policy INF1 of the Mole Valley Local Plan 2020-2039 and the advice in the NPPF.

9. The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with a scheme to be submitted to and approved by the Local Planning Authority for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking and turning areas shall be retained and maintained for their designated purposes.

Reason: The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to satisfy policy INF1 of the Mole Valley Local Plan 2020-2039 and the advice in the NPPF.

10. The development hereby approved shall not be occupied unless and until each of the proposed dwellings and 50% of the visitor parking spaces are provided with a fast charge socket (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply). The remaining visitor parking spaces shall be provided with cable routes for the future provision of charging points. To be in accordance with a scheme to be submitted and approved in writing by the Local Planning Authority and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

Reason: In recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2024 to meet the objectives of the Surrey Transport Plan 2022-2032, and the objectives of policy INF2 of the Mole Valley Local Plan 2020-2039.

11. The development hereby approved shall not be first occupied unless and until A scheme for high quality, secure, covered parking of bicycles shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of development. The scheme will have regard to SCCs Vehicular, electric vehicle and cycle parking guidance and a scheme of charging for e-bikes should be included in line with current fire regulations. The approved facilities shall be phased with the development. Thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority  
The development hereby approved shall not be first occupied unless and until A scheme for high quality, secure, covered parking of bicycles shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of development. The scheme will have regard to SCCs Vehicular, electric vehicle and cycle parking guidance and a scheme of charging for e-bikes should be included in line with current fire regulations. The approved facilities shall be phased with the development. Thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

Reason: In recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2024 to meet the objectives of the Surrey Transport Plan 2022-2032, and the objectives of policy INF2 of the Mole Valley Local Plan 2020-2039.

12. Prior to the occupation of the development a Travel Plan shall be submitted for the written approval of the Local Planning Authority in accordance with the sustainable development aims and objectives of the National Planning Policy Framework, Surrey County Council's 'Travel Plans Good Practice Guide' as generally outlined in the approved Framework Travel Plan  
ITB8107-017 E. The approved Travel Plan shall be implemented prior to the first occupation of the development. Thereafter the Travel Plan shall be complied with for the full duration of the agreed Travel Plan period.

Reason: In recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2024 to meet the objectives of the Surrey Transport Plan 2022-2032, and the objectives of policy INF1 of the Mole Valley Local Plan 2020-2039.

13. Prior to the commencement of development, excluding demolition, the following details relating to the traveller pitches shall be submitted to and approved in writing by the Local Planning Authority: 1) lighting, 2) waste storage arrangements (including capacity and design of refuse store(s)) and 3) confirmation of the provision of utilities connections for the traveller pitches, shall be submitted to and approved in writing by the Local Planning

Authority. The approved details shall be implemented and maintained thereafter.

Reason: In the interests of the amenity of the future occupiers the surrounding area and to satisfy policies EN4 and DS8 of the Mole Valley Local Plan 2020-2039.

14. The development hereby permitted shall not be occupied until details have been submitted to and approved in writing by the local planning authority to demonstrate at least 10% of the properties meet Building Regulations standard M4(2) 'accessible, adaptable dwellings' and at least 5% of the dwellings meet Building Regulations standard M4(3) 'wheelchair accessible'. Thereafter the development shall be carried out in accordance with the approved details.

Reason: To ensure the development provides accessible dwellings, in accordance with Mole Valley Local Plan 2020-2039 policy H10.

15. Prior to the commencement of development, excluding demolition, a scheme shall be submitted to and approved in writing by the local Planning Authority to demonstrate that gigabit broadband connections will be provided within all dwellings hereby permitted. Thereafter the approved scheme shall be implemented prior to occupation.

Reason: To ensure that all dwellings have a good quality digital connection in line with policy INF5 of the Mole Valley Local Plan 2020-2039.

16. No development including demolition shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work, 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 Local Planning Authority is satisfied that it is fundamental to the development permitted to address this issue before development commences and that without this safeguard in place permission should not be granted. The site covers a large surface area in which it is considered necessary to preserve as a record any archaeological information before it is destroyed by the development in accordance with policy EN6 of Mole Valley Local Plan 2020-2039.

17. The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national NonStatutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

- a) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+40% allowance for climate change) storm events and 10% allowance for urban creep. The final solution should follow the principles set out in the approved drainage strategy. Associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 4l/s/ha.
- b) Detailed drainage design drawings and calculations to include: a drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element.
- c) A plan showing exceedance flows.
- d) Details of drainage management responsibilities and maintenance regimes for the drainage system.
- e) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage

system is operational

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site and to satisfy policy INF3 of the Mole Valley Local Plan 2020-2039.

18. Prior to the first occupation 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, flow controls and outfalls), and confirm any defects have been rectified.

Reason: To ensure the Drainage System is constructed to the National Non-Statutory Technical Standards for SuDS and to satisfy policy INF3 of the Mole Valley Local Plan 2020-2039.

19. Prior to the commencement of development, including demolition, updated Preliminary Ground Level Tree Roost Bat Assessments and, if required, bat presence/likely absence/categorisation surveys shall be carried out and the results provided to the Local Planning Authority for consultation with Surrey Wildlife Trust. Thereafter the applicant shall undertake any necessary mitigation works as required by the Trust.

Reason: To safeguard the ecological interest of the site in accordance with Policy EN9 of the Mole Valley Local Plan 2020-2039 and the NPPF.

20. Prior to the commencement of the development hereby permitted, a Sensitive Lighting Management Plan, which should include a horizontal lighting plan showing lux level contours, shall be submitted for approval in writing by the Local Planning Authority. The recommendations of the Management Plan shall be carried out in full.

Reason: To safeguard the ecological interest of the site in accordance with Mole Valley Local Plan (2020-2039) policy EN9 and the National Planning Policy Framework

21. Prior to the commencement of the development hereby permitted, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP should include, but not be limited to:

- a) Map showing the location of all of the ecological features
- b) Risk assessment of the potentially damaging construction activities
- c) Practical measures to avoid and reduce impacts during construction
- d) Location and timing of works to avoid harm to biodiversity features
- e) Responsible persons and lines of communication
- f) Use of protected fences, exclusion barriers and warning signs
- g) Method of working regarding Hazel Dormouse in line with the Technical Response by Derek Finnie Associates 2024
- h) areas for the provision of a protective buffer zone to watercourses/drainage ditches during the construction and operational phases of development and treatment of run-off to protect habitat

Reason: To protect and enhance the ecological interest of the site and avoid any harm to protected species and their habitats in accordance with Mole Valley Local Plan (2020-



2039) policy EN9.

22. Prior to the commencement of development, a landscape and ecological management plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP shall include details of the following:

- a) Description and evaluation of features to be managed
- b) Ecological trends and constraints on site that might influence management
- c) Aims and objectives of management
- d) Appropriate management options for achieving aims and objectives
- e) Prescriptions for management actions, together with a plan of management compartments
- f) Preparation of a work schedule including an annual work plan
- g) Details of the body or organisation responsible for implementation of the plan
- h) Ongoing monitoring and remedial measures
- i) Legal and funding mechanisms by which the long-term implementation of the plan will be secured by the applicant with the management body responsible for its delivery
- j) Monitoring strategy, including details of how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme
- k) details of measures to create, retain and enhance habitat for amphibians and birds

Thereafter, the LEMP shall be implemented in full.

Reason: In the interests of visual amenity and biodiversity of the site in accordance with policies EN4 and EN9 of the Mole Valley Local Plan 2020-2039 and the advice in the NPPF.

23. Prior to commencement of development including demolition, a precautionary working method statement for Great Crested Newt, written by a suitably experienced ecologist, shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out in accordance with the approved details.

Reason: To further reduce the risk to Great Crested Newts and/or their habitats in accordance with policy EN9 of the Mole Valley Local Plan 2020-2039 and the advice set out in the NPPF.

24. Prior to commencement of development including demolition, a Reptile Mitigation and Enhancement Strategy written by a suitably experienced ecologist shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out in accordance with the approved details.

Reason: To ensure suitable protection of reptiles and their habitats in accordance with policy EN9 of the Mole Valley Local Plan 2020-2039 and the advice set out in the NPPF.

25. Prior to the commencement of development including demolition, an updated badger survey of the site shall be undertaken by an appropriately qualified ecologist. The results shall be submitted to the Local Planning Authority together with a badger mitigation and enhancement strategy for the site. Thereafter the approved details shall be implemented in full.

Reason: To protect the wildlife interests of the site and to comply with policy EN9 of the Mole Valley Local Plan 2020-2039 and the advice set out in the NPPF.

26. Before any above ground works take place, excluding demolition, details of how the development hereby permitted will be zero-carbon ready, shall be submitted to and approved by the Local Planning Authority and be implemented prior to the first occupation of the development. In the event of Air Source Heat Pump (ASHP) technology being used proposed for use at the site, full details of the specification and maintenance of the ASHPs shall be submitted to and approved in writing by the Local Planning and the development thereafter carried out in accordance with those approved details.

Reason: To optimise renewable energy and minimise carbon emissions and to protect the amenities of neighbouring properties and the amenities of future occupiers of the approved development, in accordance with Mole Valley Local Plan (2020-2039) policies EN13 and EN4

### Informatives

1. Proportionate public benefit through public engagement activities should be secured to offset any negative archaeological impacts of the development. The applicant should seek, via their archaeological consultants, to include public engagement opportunities in the archaeological process. This may include; site visits during the evaluation or subsequent archaeological mitigation processes and a presentation on the results of the archaeological work to local groups or Societies.
2. The permission hereby granted shall not be construed as authority to carry out any works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see <http://www.surreycc.gov.uk/roads-and-transport/permits-and-licences/traffic-management/permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see [www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice](http://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice).
3. The permission hereby granted shall not be construed as authority to carry out any works on the highway. The applicant is advised that prior approval must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, or verge to form a vehicle crossover to install dropped kerbs. [www.surreycc.gov.uk/roads-and-transport/permits-and-licences/vehicle-crossovers-or-dropped-kerbs](http://www.surreycc.gov.uk/roads-and-transport/permits-and-licences/vehicle-crossovers-or-dropped-kerbs).
4. In the event that the access works require the felling of a highway tree not being subject to a Tree Preservation Order, and its removal has been permitted through planning permission, or as permitted development, the developer will pay to the County Council as part of its licence application fee compensation for its loss based upon 100% of the tree's CAVAT valuation to compensate for the loss of highway amenity.

5. The developer would be expected to agree a programme of implementation of all necessary statutory utility works associated with the development, including liaison between Surrey County Council Streetworks Team, the relevant Utility Companies and the Developer to ensure that where possible the works take the route of least disruption and occurs at least disruptive times to highway users.
6. The applicant is expected to ensure the safe operation of all construction traffic to prevent unnecessary disturbance obstruction and inconvenience to other highway users. Care should be taken to ensure that the waiting, parking, loading and unloading of construction vehicles does not hinder the free flow of any carriageway, footway, bridleway, footpath, cycle route, right of way or private driveway or entrance.
7. The developer is also expected to require their contractors to sign up to the "Considerate Constructors Scheme" Code of Practice, ([www.ccscheme.org.uk](http://www.ccscheme.org.uk)) and to follow this throughout the period of construction within the site, and within adjacent areas such as on the adjoining public highway and other areas of public realm. Where repeated problems occur the Highway Authority may use available powers under the terms of the Highways Act 1980 to ensure the safe operation of the highway
8. It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Electric Vehicle Charging Points shall be provided in accordance with the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development 2023. Where undercover parking areas (multi-storey car parks, basement or undercroft parking) are proposed, the developer and LPA should liaise with Building Control Teams and the Local Fire Service to understand any additional requirements. If an active connection costs on average more than £3600 to install, the developer must provide cabling (defined as a 'cabled route' within the 2022 Building Regulations) and two formal quotes from the distribution network.  
operator showing this
9. Design standards for the internal layout, construction of access roads and junctions, including the provision of visibility zones, shall be in accordance with the requirements of the County Highway Authority.
10. The developer is advised that as part of the detailed design of the highway works required by the above conditions, the County Highway Authority may require necessary accommodation works to streetlights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment- this shall be at the developer's own expense.
11. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
12. Notwithstanding any permission granted under the Planning Acts, no signs, devices or other apparatus may be erected within the limits of the highway without the express approval of the Highway Authority. It is not the policy of the Highway Authority to approve the erection of signs or other devices of a non-statutory nature within the limits of the highway.

13. It is the responsibility of the developer to provide e-bike charging points with socket timers to prevent them constantly drawing a current over night or for longer than required. Signage should be considered regarding damaged or shock impacted batteries, indicating that these should not be used/charged. The design of communal bike areas should consider fire spread and there should be detection in areas where charging takes place. With regard to an e-bike socket in a domestic dwelling, the residence should have detection, and an official e-bike charger should be used. Guidance on detection can be found in BS 5839-6 for fire detection and fire alarm systems in both new and existing domestic premises and BS 5839-1 the code of practice for designing, installing, commissioning, and maintaining fire detection and alarm systems in non-domestic buildings.
14. If it is the applicant's intention to offer any of the roadworks included in the application for adoption as maintainable highways, permission under the Town and Country Planning Act should not be construed as approval to the highway engineering details necessary for inclusion in an Agreement under Section 38 of the Highways Act 1980. Further details about the post-planning adoption of roads may be obtained from the Transportation Development Planning Division of Surrey County Council.
15. The developer is advised that Public Footpath Numbers 76 and 84 run adjacent to the application site and it is an offence to obstruct or divert the route of a right of way unless carried out in complete accordance with appropriate legislation.
16. Any proposed resurfacing of the existing Right of way must only be done with prior permission and agreement of the County Highway Authority. To undertake works to the surface of a right of way without lawful authority is an offence under the Highways Act 1980. The changes to the PROW and the associated improvements will be subject to a S278 Agreement under the Highways Act 1980.
17. Whilst work to the PROWs is underway, a temporary closure will be necessary. A minimum of 3 weeks' notice must be given and there is a charge. Please contact the Countryside Access Officer at Surrey County Council as required. Without a closure in place, there are to be no obstructions on the public right of way at any time, this is to include vehicles, plant, scaffolding or the temporary storage of materials and/or chemicals. To do so is an offence under the Highways Act 1980
18. For a development of this size, the County Highway Authority requires a far greater range of sustainable and accessible transport offering in mitigation, including improved local bus frequency, high quality bus stop infrastructure as well as a flexible demand driven bus service. The S106 Obligations included above are to ensure a contribution of £40K/annum from 1st occupation of the development occupation to provide a DDRT service including evenings and weekends.
19. 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 Surrey County Council's website.
20. 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.
21. Sub ground structures should be designed so they do not have an adverse effect on groundwater

22. The applicant's attention is drawn to the advice in the consultation response from Thames Water dated 1st March 2024
23. The applicant is advised that a Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. As part of this, the developer should demonstrate measures to be undertaken to minimise groundwater discharges to the public sewer. It is recommended that petrol/oil interceptors be fitted in all car parking areas in order to avoid oil polluted discharged entering local watercourses
24. The applicant is encouraged to seek accreditation to the Secured by Design Gold standard in order to ensure that the development meets the highest possible standards in terms of both physical and design security

The Council confirms that in assessing this planning application it has worked with the applicant in a positive and proactive way, in line with the requirements of paragraph 186-187 of the National Planning Policy Framework 2012.

## **Main Society or Parish Council Representations**

### Effingham Parish Council

- Oppose the application
- Part of the proposal would still be in the Green Belt following Regulation 19 of the Emerging Local Plan
- Other planning permissions around the area which would add to the increase in traffic
- Overdevelopment of Green Belt between two villages
- If approved there would be un-restricted sprawl
- The development would seriously impact the wildlife corridor through this area
- The Gypsy/Traveller site would be located on a high risk flood area
- The development would increase surface water
- No mention in the proposal documents of the need for additional infrastructure, in particular GPs and school places

### Effingham Residents Association

- Strongly object to the application.
- The application represents inappropriate development in the Green Belt.
- Effect on traffic congestion and pedestrians' and cyclists' safety.
- Increased risk of surface water flooding.
- Inadequate Infrastructure.
- Damaging Effect to Wildlife.
- Damage to heritage assets – it is in the Little Bookham Conservation Area

### Burnhams Road Resident Association

- Concerns with connectivity routes for pedestrian and cyclists and which roads would be used and not enough information about how existing routes would be 'enhanced'.
- Transport issues would be significant due to the additional vehicle traffic on the road network

### Residents of Water Lane

- The primary issues of objection relate to the following: 1. The inappropriate location of the proposed gypsy and traveller pitches; 2. The development of approximately 2 hectares of land that lies within the Green Belt

### Bookham Residents Association

- Concerns about the effects on infrastructure with other approved developments
- BRA analysis – volumes of traffic would be increased by approximately 50%
- Community Building and Gypsy & Traveller Site to be built on Green Belt Land
- Ecology issues – removing trees
- Serious drainage and sewage issues
- Effects on the chalk streams that run through the land
- Proposal will affect Bookham's infrastructure especially when considered alongside the nearby approved developments

- Limited public transport
- Traffic flow projections do not represent the real situation
- Short distance between the site access and Preston Cross roundabout
- Increase traffic will increase impact on air quality
- Water Lane is inappropriate for the access to the Gypsy & Traveller site
- Cycle route is proposed via Fox Lane, however, Burnhams Road is quicker but is a private road
- *Trip generation per household is low compared to those used by Motion and Glanville*
- Traffic concerns over
  - o car ownership,
  - o traffic flow in terms of road widths, Preston Cross and queuing at junctions
  - o school drop-offs/collections
  - o air quality
  - o community facility and SANG
  - o Water Lane access for Travellers' pitches
  - o Cycle and pedestrian routes
- Concerns over the Green Belt
- Incomplete Tree Survey – trees are missing off the survey
- Mature Lime tree at the access would have to be removed
- Gypsy & Traveller Site and Community Building is within the Green Belt
- Roman coins and Iron Age coins and a brooch found within 1km of the study site – archaeological issue
- Inappropriate drainage to Water Lane and Fox Lane
- Chalk springs consistently flood the area of where the development would be
- (The report that these summarised points comes from a detailed account submitted by the Bookham Residents Association)

### **Representations received following renotification of amendments on 27th November 2024**

#### Bookham Residents Association

- Density of houses is not proportionate to the reduction in land use
- Building heights are expressed as storeys not heights so it difficult to assess their impact
- Affordable housing mix has not been supported by the Affordable Housing Officer
- What parking are they providing for the proposed dwellings
- Issues regarding utility connections in particular EV charging
- Community Orchard welcome, however, it is located in a flood area. Questions over whether it is suitable and realistic.
- Concerns and questions regarding the costs and management of the SANG
- Gypsy & Traveller and Community sites have been moved from the Green Belt to adjacent the Conservation Area which still causes concern
- Substantial amount of the green buffer has been removed
- Noise and visibility of the built development will damage the quiet setting of the Conservation area
- Flood risk in terms of waste water and Surface water drainage –
  - o no mention of upgrading the existing drainage
  - o the area was flooded with sewage in Autumn 2023
- Concern regarding the chalk streams regarding flooding – no indication that the watercourse metric has been included

- There is no indication on how pedestrians and cyclists will be discouraged to use Burnhams Road which is a private road instead of Fox Lane
- Swept path needs to be corrected due to the size of vehicles used on the access
- Excessive amounts of traffic will be produced from the development
- Bookham Residents Association put forward concerns regarding the *costings presented may considerably underestimate the likely outturn*
- Bookham Residents Association put forward exclusion times for movement in and out of the site taking into consideration the nearby school
- Bookham Residents Association put forward videos showing the extent of flooding in the area

#### Effingham Residents Association

- Site is unsuitable for large scale development causing long term problems regarding drainage, surface water flooding and traffic
- Accepted that the site is now in the Local Plan
- The amended application does not meet the requirements and policies of the adopted plan
- Development does not provide a clearly defined physical boundary
- The application does not conserve the Conservation Area or the listed buildings around it
- The buffer zone has decreased from 10 metres to 5 metres. EFFRA recommends that it should be 15 metres

### **Neighbour Representations**

#### Highways and traffic

- Local roads within Bookham such as Lower Road will not be able to deal with the increase of traffic, commuters, school runs, home deliveries, service vehicles etc the size of the proposal will generate.
- Highways and traffic data not reflective of the true congestion faced in the surrounding roads, and no reference as to how the increase in work vehicles for the building of the site will be supported
- Increased traffic would make it unsafe for children to be able to walk to school, therefore, highway safety has not been considered
- Insufficient road network on Water Lane to accommodate the types of vehicles that would require access to the gypsy and traveller pitches
- The site access at 330 Lower Road would be located 30 metres away from the Preston Cross roundabout presenting danger and congestion to all road users; cars, pedestrians and cyclists
- No zebra crossing or pavement planned on the access of the site. (North side of Lower Road between The Saddlery and the Conservation Area)
- Inadequate existing public transport. The development would exacerbate this
- No plans to widen roads or put in a central reservation to help alleviate cars turning into the development.
- Roads cannot be widened to take on the excess traffic
- Lower Road and Rectory Road are effectively single lane roads due to the amount of cars parked especially during school drop off times – no explanation of how this will be updated.
- Roads in terrible condition. Increase in traffic will worsen the condition of the roads.



- The proposed crossing for pedestrian/cyclists is in an area that get flooded regularly.
- Poor visibility turning east out of Water Lane.
- The proposed uncontrolled pedestrian crossing point on Lower Road from Water Lane is dangerous.
- The swept path analysis needs updating to reflect the use of wider vehicles transporting static caravans into Water Lane not a 4 x 4 luxury caravan towed by a car or SUV
- The Gypsy/Traveller site would not have satisfactory access to the road network
- The Gypsy/Traveller site would not have satisfactory connections for sewerage

### Flooding

- Located in a flood plain
- Increased risk of flooding due to climate change
- Nearby ponds and adjacent woodland overflowing
- Heavy clay area that does not drain
- Little Bookham Street regularly has to have the drains pumped as they back up, therefore the area won't be able to cope with further demand on the drains.
- If the site was built on, it would increase the surface water runoff onto the existing residents' properties
- No site wide hydrogeological assessment has been undertaken to assess the potential impact of such events on the proposed development and consequently this undermines the validity of the conclusions of the report
- Thames Water have had to attend Water Lane on several occasions in the past due to the water levels
- The Saddlery Development by Thakeham Homes has added to the flooding in that area
- The gypsy and traveller site would be raised by 600mm diverting the flood water into properties on Water Lane which already floods
- No flooding impact surveys for the surrounding areas
- No maintenance to the flowing to the 600 mm culvert running under Fox Lane for many years. It is in poor condition due to erosion
- Who will be liable for future flooding

### Green Belt

- NPPF for green belts – Preston Cross contravenes a number of the below
  - o To check the unrestricted sprawl of large built-up areas
  - o To prevent neighbouring towns and villages merging into one another
  - o To assist in safeguarding the countryside from encroachment
  - o To preserve the setting and special character of historic towns
  - o To assist in urban regeneration by encouraging the recycling of derelict and other urban land
- Inappropriate development in the Green Belt
- Destruction of wildlife and the Green Belt
- Developing this site would contravene policy EN1 as there are no 'exceptional circumstances' proven within this proposal to release it for development.
- A final decision has not been made on the Mole Valley local plan and the area where the community building and Gypsy Traveller pitches would still remain within the Green Belt, therefore inappropriate
- The NPPF Paragraphs 142- 156 provides significant protection for the Green Belt which should be adhered to until such time as the boundaries are changed.
- In 2020 MVDC published a Constraints Analysis "The open land north and north west of Bookham is significantly protected with very little of the land undesignated".

- The NPPF provides strong protection and states that inappropriate development in the Green Belt should not be approved except in 'very special circumstances' and that a Green Belt boundary may only be adjusted in 'exceptional circumstances'. Unmet housing need does not constitute 'very special circumstances'

### Ecology

- In a conservation area
- The site has underground chalk streams and springs which are classified as rare and should be protected at all costs.
- The site suffers from saturation from the underground streams, and this cannot be mitigated as the streams do not follow a particular course and can appear anywhere on the site.
- The number of trees that will need to be felled will add to the drainage issues.
- The backdrop of development at this site would significantly alter the setting of the conservation area and would be contrary to MVDC policy to safeguard the wider setting of heritage assets.
- Do not need publicly accessible green space, but to protect irreplaceable habitats
- The site abuts ancient woodland at Oaken Wood
- Houses along Little Bookham Street are permanently flooded due to the springs that run underground which are unpredictable and can appear and disappear at random
- The loss of the natural springs will have a significantly negative impact on wildlife including Geese, Foxes, bats, owls and many species of reptiles and insects.
- Potential felling of large Lime tree next to the proposed access
- Breeding grounds for wildlife
- It will completely destroy the wildlife breeding within this field and its lakes
- Inadequate bat survey of the site. No survey for presence of Bechstein's Bat
- More disturbance to wildlife due to public footpaths being used more with the increase in residents in the area.
- The BRA are concerned that healthy trees are to be felled (PA21) and has requested a full site survey and site visit.
- National Trust and Surrey Wildlife Trust have raised concerns in the latest amendments of information (May 2024)

### Services

- Added demand on gas supply
- The area between Water Lane and Little Bookham Street has over the past years suffered from sewage problems
- Thames Water accepted that the sewer from Water Lane which runs across the fields to Little Bookham Street is in poor condition and should not be used for new connections.
- Concerns about sewer capacity as Water Lane has experienced significant foul drainage issues in recent years.

### Local amenities

- Increased pressure on schools and healthcare without any adequate provision
- Local medical facilities and schools are already at and over capacity
- Approved site at Howard of Effingham will increase the number of patients at the surgery, new surgeries need to be built if these applications are to go ahead.
- Will essentially push people to have to drive outside the local area to reach schools, surgeries, dentists etc, therefore has impact on the environment
- Proposed development would put pressure upon Bookham and its infrastructure as a Community and Shopping location.

- Buses and trains will need to run more than once an hour to support the new residents
- There are no medical facilities in Effingham therefore pushing all medical needs into the surrounding towns and villages

#### Proposed Layout

- 3 storey buildings would impact the area significantly. Proposed trees would take years to grow to deliver the screening from these buildings.
- The 2.5 and 3 storey buildings would be out of character with the local area and likely to affect privacy outlook for neighbouring properties
- Proposed Community facility. Who will operate this, at whose cost?
- Unsuitable location for the gypsy and traveller pitches and in breach of Policy H5 of the Local Plan.
- Proposing to build a Community building and Gypsy/Traveller accommodation upon land that will remain in the Green Belt – unacceptable
- Overlooking and overshadowing adjacent properties
- Need to take into account the development of 110 houses at Lodge Farm development and 400 houses at The Howard of Effingham and 2000+ at Wisley
- This proposal does not integrate the Traveller Pitches into developments as recommended and provides an isolated area with no access to the overall site
- Developing within brownfield sites rather than green belt - widely accepted that new housing should be limited to brownfield sites where possible
- The government states that building on the Green Belt is only permissible under exceptional circumstances and when no brownfield sites are available.
- During the consultation phase of the Howard of Effingham application, Thames Water accepted that the sewer from Water Lane which runs across the fields to Little Bookham Street is in poor condition and should not be used for new connections.
- Density of the proposed buildings would be too much

#### Pollution

- Disruption due to noise as the development is built
- Noise, light and dust pollution during development
- Congestion leading to poorer air quality even after the development is built
- The Green Belt is the lung of London – we need to make sure this is protected

#### Merging

- The proposal would cause Effingham and Bookham Villages to become one, which is against the planning guidelines
- creeping creation of a single Leatherhead to Horsley conurbation
- encroachment with Effingham
- Turning Bookham from a village into a town

#### Misc

- The reasonable enjoyment of the buildings and gardens by residents of Little Bookham Street will be significantly affected during construction and in the future.
- Acceptance of the need for additional and affordable housing in the area but every other impact outweighs this in this area
- Gypsy and Traveller Pitches do not have satisfactory connections for sewerage and waste disposal.
- The proposals on Wastewater and Flood Risk management are significantly lacking in detail
- Years of disturbance and noise from the development

- Community centre pointless as it could be used as a new medical centre
- House prices would be well beyond the means of many local residents and most importantly the younger generation, exacerbating the existing housing crisis and perpetuating socio-economic inequality within the community
- Gypsy and Traveller pitches would reduce the amenity for the residents of Water Lane. By raising the ground by 600mm would raise fences, boundary walls and buildings above window heights, possibly even eaves height of the adjacent bungalow creating impact to overlooking and privacy issues
- Thakeham Development is not in keeping with the agreed Neighborhood Development Plan (NDP) for Bookham.
- No reference to security or safety measures being proposed for the development. The applicant has said these issues would be addressed at a future date
- New documents
  - o PA22 - Transport & Travel dated 30th April 2024 – impossible to reconcile the traffic data within this document
  - o ECOL - The ecological note dated 30th April 2024 by Derek Finnie Associates – employed by Thakeham which would be a conflict of interest
  - o PA21 - Tree Survey & Landscaping dated 30th April 2024 – BRA disputed trees to be felled and a full site survey and visit has been requested

### **Representations received following renotification of amendments on 27th November 2024**

#### Highways and traffic

- An extra 750 cars would drive along this narrow road (assuming every house has 2 cars)
- Increase traffic at busy times
- Lower Road cannot sustain the increase in cars
- All access is being proposed through 330 Lower Road approx. 30 metres from Preston Cross – will increase traffic
  - o This would create severe operational and safety challenges for the highway and also emergency services which could potentially not be able to access the site
  - o 200 houses will be accessed through this one access
  - o Gypsy & Traveller and community sites will also have access through here
  - o Driver deliveries will access through here
  - o Near to the mini roundabout and bus stop causing increased traffic
  - o Health and Safety risk to children and pedestrians trying to cross this road to get to the school etc
  - o More than one access to the site should be provided
  - o 15 metres trailers would need access to the Gypsy & Traveller site
- Health and safety issues for children walking to school
- It would be impossible to provide access to the large amount of HGVs for the construction of the development
- Pedestrian/cycle access inconsistent – access for these routes are through areas where flooding is persistent
- Inadequate pedestrian crossing
- Applicant suggesting using Fox Lane (private road) as a cycle cut through

#### Flooding

- The development would be built in flood plane
- It would displace the high amount of water here and flood existing residents' homes

- No plans to develop the drainage in Fox Lane which already floods, which is where the water is being suggested that it will be directed through
- Sink hole on Childs Hall Road has caused the collapse of the tarmac on more than one occasion – more traffic and hard standing will increase this risk
- None of the documents give real confidence that the flood documents will work
- serious concern that Fox Lane and Little Bookham Street will not be protected from flooding due to overloading the existing systems
- The chalk streams have not been acknowledged within the submission
- (Photos submitted with various letters of representation to illustrate the extent of the flooding along the roads and to the rear gardens and potential building site)

### Green Belt

- Development now moved out of the Green Belt
- There is no clearly defined boundary between the edge of the Green Belt and the residential development
- Unsuitable positioning of the LEAP and SANG carpark within the Green Belt
- Nothing proposed for the 'visually sensitive edge' to respect the amenity of occupiers opposite the site
- No permanent boundary along the new Green Belt boundary between areas BA and BB

### Ecology

- Reduction in the buffer from 10 to 5 metres
- Various conditions should be added to any approval for the removal of rubbish and a shed, thinning of conifers, and removal of giant hogweed
- The reduced 5 metre buffer to replace the originally proposed 10 metre buffer would be insufficient
  - o Increased loss of amenity for neighbouring properties
  - o Overlooking and light pollution
  - o Removal of the screening further residents enjoyment of life and wellbeing
- Illustrative Masterplan does not show the retaining of the mature oak trees where the proposed treatment basin would be located
- Screening of trees will be reduced
- Who will manage the SANG?
- Proposed retained trees will not withstand the building of the development including the pollution and genera disruption
- Proposed wildlife corridor would be through the gardens of the residents
- Displacement of a large amount of wildlife

### Services

- No information on extra infrastructure
- The wastewater drainage proposals do not address the existing poor foul sewer which serves multiple properties and is prone to flooding

### Local amenities

- No new doctors or dentist surgeries being proposed. There are already problems with these services

### Proposed Layout

- loss of amenity from the 2.5 and 3 storey properties
- There has been a reduction in the area of the site by 25%, however it still holds 200 units
- Density of the site should reduce in line with the reduction in area
- Increased visibility of the proposed buildings as they are taller than the previous submission
- Housing density of the proposal would be 2.5 times greater than the existing adjacent properties, which would be inappropriate to the character of the area

#### Pollution

- Noise and pollution from the volume of traffic and varying sizes of vehicles accessing the site

#### Merging

- Additional development to the ones already approved
- The location is inappropriate on the edge of the Councils domain whilst there has been a 900 house and school planning application

#### Gypsy & Travellers Pitches and Community Building

- Concern for access for the Gypsy & Travellers Pitches and Community Building being through 330 Lower Road
- Damage to the Conservation Area now that the Community Centre and Gypsy & Travellers site has been moved
- Concern over the new position of these two sites being close to The Saddlery as the Green Buffer Zone has been reduced to 5 metres. Request to increase to a 10 metre Green Buffer Zone and increase to 15 metres along the Little Bookham Conservation Area
- Increased light and noise pollution for neighbouring properties

#### Heritage

- The development would be adjacent to the Conservation Area
- The edge of the development is on a Conservation Area. SCC suggests that it will cause a low level of less than substantial harm to the Conservation area which is unacceptable
- Unsuitable design relating to the character of the area
- Gypsy & Traveller and Community Building sites would have a detrimental impact on the Conservation Area
- Inaccuracies in the applicants Heritage Impact Statement
- The development would be adjacent to listed buildings