

---

**Planning Statement**

---

---

**STREAMSIDE,  
HARPERS ROAD,  
ASH**

---

---

**FULL PLANNING APPLICATION**

**FOR**

**THE ERECTION OF 24 DWELLINGS (23 NET),  
WITH ASSOCIATED LANDSCAPING AND  
ACCESS FROM HARPERS ROAD.**

---

**Prepared by:**

**Woolf Bond Planning**

**On behalf of: Bourne Homes**



---

**November 2023**

**WBP Ref: SB/LM/7972**



**Woolf Bond Planning**  
Chartered Town Planning Consultants

## **CONTENTS**

<b>1. INTRODUCTION</b>	<b>3</b>
<b>2. DESCRIPTION OF SITE AND SURROUNDING AREA</b>	<b>8</b>
<b>3. DESCRIPTION OF PROPOSED SCHEME</b>	<b>11</b>
<b>4. PLANNING HISTORY</b>	<b>22</b>
<b>5. PLANNING POLICY ASSERSMENT</b>	<b>25</b>
<b>6. ASSESSING THE ACCEPTABILITY OF THE APPLICATION SCHEME</b>	<b>65</b>
<b>7. SUMMARY AND CONCLUSION</b>	<b>80</b>

## **1. INTRODUCTION**

### **General**

- 1.1. This Statement has been prepared by Woolf Bond Planning LLP in support of a FULL planning application by Bourne Homes on land at Streamside, Harpers Road, Ash **for 24 dwellings (23 net)**, with associated landscaping and access from Harpers Road.
- 1.2. The purpose of this Planning Statement is to summarise the findings of the various supporting technical documents (section 4 refers) and to provide an overview of the proposed scheme, whilst setting out a justification for the development having regard to the relevant planning policy and material considerations.
- 1.3. The Application Site is shown edged red on the accompanying Site Location Plan No. 6502-LOC1C and extends to approximately 1.26ha.
- 1.4. Details of the proposed development are shown on Proposed Site Plan, Drawing No. 6502-PL-01M.
- 1.5. This Planning Statement carries out an assessment of the Application Scheme against Section 38(6) of the Planning and Compulsory Purchase Act 2004, which sets out a requirement for planning applications to be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 1.6. The Application Site is located within the settlement boundary of Ash along the eastern periphery of wider A31 policy allocation for housing.
- 1.7. For the reasons set out in this Statement, the Scheme satisfies the economic, social and environmental roles of the NPPF and represents a sustainable form of development.

## **Planning Policy Context**

- 1.8. For the purposes of s38(6), the existing Development Plan for Guildford, in so far as it relates to the determination of this Application, comprises as follows:
- Guildford Borough Local Plan: Strategy and Sites 2015-2034 (LPSS) (2019)
  - Guildford Borough Local Plan: Development Management Policies (LPDMP) (2023)
  - The South East Plan (2009): (revoked 2013); retained policy NRM6 Thames Basin heath Special Protection Area (SPA)
- 1.9. The LPSS was adopted in April 2019 and sets out the overarching strategy in seeking to meet development needs in the period 2015-2034.
- 1.10. The Local Plan requires a minimum of 10,678 dwellings over the period 2015-2034, to be delivered in the Borough. As such, Guildford Borough's housing requirement equates to 562 dwellings per annum.
- 1.11. The Application Site is allocated in the LPSS, under Policy A31, for residential uses. Whilst the Application Site only forms part of the A31 policy allocation, the allocation as a whole is relied upon to deliver 1,750 dwellings.
- 1.12. As such, subject to material planning considerations, the development of the Site for 24 dwellings is acceptable in principle.
- 1.13. Paragraph 11(c) of the NPPF requires decision makers to approve development proposals that accords with an up-to-date development plan without delay. As will be detailed in this Statement, the proposal accords with the development plan for Guildford Borough and therefore benefits from the presumption in favour of sustainable development as prescribed by paragraph 11(c) of the NPPF.

## **The Application**

- 1.14. This application is made in full for the erection of 24 dwellings including policy compliant affordable housing provision, associated landscaping and open space with access from Harpers Road.
- 1.15. The Application Site is shown edged red on the accompanying Site Location Plan No. 6502-LOC1C and extends to approximately 1.26ha.
- 1.16. Details of how the Site is proposed to be developed are shown on Proposed Site Plan Drawing No. 6502-PL01M and accompanying plans as well in the Design and Access Statement.
- 1.17. The access arrangements are shown on Drawing 231684/TS/03 – Proposed Access Arrangements and Drawing 231684/TS/04 – Proposed Access Visibility. These drawings are included in Appendix C of the Transport Statement prepared by Lanmor.
- 1.18. As detailed in the Flood Risk Assessment (FRA”) that accompanies the application, the site is classified as falling within Flood Zone 1, placing it within the category of land at the lowest risk of flooding from fluvial sources. The site has been allocated for residential development in the Development Plan Policy A31 Site Allocation. As such, a sequential test is not required.
- 1.19. Furthermore, there is capacity in the local highway network (as detailed in the supporting Transport Statement ‘TS’) to support the traffic generation predicted to arise from the proposed development.
- 1.20. As set out in the TS accompanying the application, the Site is well connected to local services and facilities, with access to walking and cycling routes as well as to public transport. There are a range of facilities in the local area that can support the development via a local short journey, and the addition of new residents would improve the viability of these local services. The proposal meets the relevant regional and local transport policy requirements and therefore can be considered acceptable in these terms.

- 1.21. As set out in this Planning Statement, the benefits of the scheme include the provision of both market and affordable housing, in a sustainable location within the settlement boundary, within walking distance from local services and facilities, to help meet identified housing need within the Borough on an allocated site.
- 1.22. The scheme also secures additional local expenditure through an increased local population, council tax revenues, and new homes bonus as well as additional construction jobs.
- 1.23. The supporting Structural Landscape Strategy, Biodiversity Management and Enhancement Strategy, and the layout shown on Drawing 6502-PL01M detail how the development will provide on-site landscaping and biodiversity enhancements, which mitigate the impact of the proposed development in landscape and visual terms.
- 1.24. As set out in this Statement, the scheme accords with relevant planning policy considerations, including the presumption in favour of sustainable development set out in the NPPF.

### **Benefits of the Proposed Scheme**

- 1.25. In assessing the merits of the Application, the benefits of the scheme include the following:
  - Provision of much needed affordable and market housing in a sustainable location, helping to meet identified housing needs in the context of an allocated site.
  - Delivery of a significant proportion of affordable housing (40%) in line with the development plan policy requirement.
  - Provision of a measurable biodiversity net-gain, including through on-site planting of new landscaping, and offsite measures.
  - A form of development, including by means of the proposed landscape led strategy that can be assimilated into the character of the surrounding area and provide an improved landscaped buffer to the existing urban edge.

- Publicly accessible green space
- Increased local expenditure to sustain local services and facilities
- Local job opportunities and increased economic activity in the short, medium and long term.
- The scheme satisfies the economic, social and environmental roles of the NPPF

## **2. DESCRIPTION OF THE SITE AND SURROUNDING AREA**

### **Context**

- 2.1. The Site lies within the eastern edge of the Policy A31 allocation, which will see the construction of around 1,750 homes, together with associated open space and infrastructure, to the immediate north-west, west and south of the application site. While the application site currently benefits from a semi-rural/ woodland and countryside setting it is acknowledged that current development and applications for the surrounding sites that make up this strategic allocation will fundamentally change the character of the landscape setting, over time forming an urban extension to Ash. This approach is accepted in policy and demonstrated by the facts that construction has commenced on the adjacent 'Wildflower Meadow Site' and the recent planning permission for the neighbouring 'Orchard Farm' site.
- 2.2. The site lies on the north-east boundary of Ash. Ash hosts a range of commercial, social, and community services accessible to the development. Ash Station is c.575m away from the site, accessible on foot through Wildflower Meadows and the existing Public Right of Way (356). There are several bus stops along Guildford Road to give broader public transport accessibility.
- 2.3. The site lies within the 400m to 5km buffer of the Thames Basin Heaths Special Protection Area. As part of the Local Plan preparation, the strategic allocation (Policy A31) was subject to a Habitat Regulations Assessment.

### **The Site**

- 2.4. The Site is approximately 1.26 hectares in area; adjoining Oakside Cottage to the south and east, located and abutting Harpers Road to the east, and is located east of the currently under-construction Wildflower Meadows (16/P/01679) and application for Orchard Farm (22/P/01083). The site is known locally as Streamside.
- 2.5. The site is formed of two elements in a north/south orientation. The northern element has a woodland character with tree belts lining the boundaries. The southern element consists of the existing dwelling known as Streamside, with



some retained incidental buildings present, as well as noting some outbuildings have been removed. From within the southern element, most of the site has a more open character, being comprised of former grassland, with mature verdant boundaries providing character as well as enclosure.

- 2.6. It is located on the western side of Harpers Road and forms part of the eastern boundary of larger allocation for housing development under Policy A31 of the Strategy and Sites Local Plan.
- 2.7. No part of the site is within or adjoining a Conservation Area.
- 2.8. Nor is the Site designated for any landscape 'value' or quality.
- 2.9. As detailed in the Flood Risk Assessment that accompanied the application, the site is classified as falling within Flood Zone 1. There are no further environmental constraints which would preclude the proposed development.
- 2.10. The northern portion rises to the north and is a central open grassland with one protected tree centrally located, framed by boundary trees. The southern portion is currently a single dwelling with a large domestic garden framed by fragmented hedges of low landscape quality. A broken treed hedgerow screens Oakside Cottage located to the east which will be augmented to retain and enhance this screening.
- 2.11. The central woodland between the two portions along the existing stream is a very distinctive landscape to Harpers Road and to the proposed long meadow in the Orchard Farm application and will be retained, enhanced, and managed. Generally, both portions are well screened from Harpers Road.
- 2.12. The site has two points of access off Harpers Road. The southern portion with an existing access to the dwelling and garage. The northern portion with an existing access. Harpers Road is relatively narrow (4.1 to 4.5m wide), framed by trees, residential fencing/ hedging, and a ditch; it has a 30mph speed restriction. The road has no pavement and is used by pedestrians, cyclists, and horse riders as an informal shared route.

- 2.13. The Environment Agency (April 2023) has identified the site as Flood Zone 1 (low probability of flooding).
- 2.14. There is a Tree Preservation Orders (GBC TPO 3 2017) protecting the trees and tree groups across the north portion of the site. There are no Veteran Trees within the site.
- 2.15. The landscape character assessment identifies the site as a) National Character Type 114: Thames Basin Lowlands; and b) Guildford Landscape Character Assessment: E1 Wanborough Wooded Rolling Claylands. In terms of NPPF Paragraph 174(a) the site is not considered a valued landscape.
- 2.16. The site is located in the setting of (York House (Grade II)), whilst noting that to the south west on the opposite of the railway are heritage assets some distance away. These are Ash Manor (Grade II\*), Old Manor Cottage (Grade II\*), Church of St Peter (Grade II\*), Ash Manor Oast (Grade II), The Oast House (Grade II), and Oak Barn (Grade II) setting of various heritage assets. It is recognized that the site sits within the distant heritage assets noted and has been assessed accordingly.

### 3. DESCRIPTION OF THE PROPOSED SCHEME

#### General

- 3.1. The full application scheme has been developed and informed following a thorough review of the opportunities and constraints afforded by the Site.
- 3.2. The scheme seeks to provide 24 dwellings (net 23) including affordable housing with associated landscaping and access from Harpers Road.
- 3.3. The application description is as follows:

#### **THE ERECTION OF 24 DWELLINGS, WITH ASSOCIATED LANDSCAPING AND ACCESS FROM HARPERS DRIVE**

- 3.4. The proposals are set out on the following plans:

Plan No.	Item	Revision	Author
6502-LOC1	Location Plan	C	ECE Architecture
6502-BLOC	Block Plan	D	ECE Architecture
6502-PL-01	Proposed Site Plan	M	ECE Architecture
6502-PL-02	Presentation Layout	B	ECE Architecture
6502-PL-03	Detailed Layout	B	ECE Architecture
6502-PL-20	Streamside Existing Site Plan		ECE Architecture
6502-PL-23	Existing Streamside Dwelling - Elevations and Floor Plans	A	ECE Architecture
6502-PL-26	Existing Pool House - Elevations and Floor Plans	A	ECE Architecture
6502-PL-28	Oakside Cottage - West Elevation	A	ECE Architecture
6502-PL-29	Oakside cottage - West Elevation with Window Blocked Up	B	ECE Architecture
6502-PL-31	Existing Garage - Elevations and Floor Plans	A	ECE Architecture
6502-PL-40	Plot 1 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-41	Plot 2 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-42	Plots 3 and 4 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-43	Plots 5 and 6 - Proposed Elevations and Floor Plans	B	ECE Architecture

6502-PL-44	Plots 7 and 8 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-45	Plots 9 and 10 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-46	Plot 11 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-47	Plots 12, 13 and 14 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-48	Plots 15 and 16 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-49	Plot 17 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-50	Plots 18 and 19 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-51	Plots 20 and 21 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-52	Plots 22 and 23 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-53	Plot 24 - Proposed Elevations and Floor Plans	B	ECE Architecture
6502-PL-54	Garages and Car Barns - Proposed Floor Plans and Elevations	C	ECE Architecture
6502-PL-56	Proposed Floor Plans and Elevations, Triple Garage		ECE Architecture
6502-PL-60	Proposed Street Elevations	B	ECE Architecture
231684/TS/03	Proposed Access Arrangements		Lanmor Consulting
231684/04	Proposed Access Visibility  Tree Constraints Plan Tree Protection Plan		Lanmor Consulting Merewood Merewood

Furthermore, the following plans are submitted for informative and illustrative purposes:

#### Supporting Plans

Plan No.	Item	Revision	Author
231684/TR/01	Vehicle Swept Path Assessment – Refuse Lorry		Lanmor Consulting
231684/TR/02	Vehicle Swept Path Assessment – Fire Appliance		Lanmor Consulting
6502-PL-55	Proposed Visualisations		ECE Architecture

3.5. The full list of supporting technical surveys and reports is included in The Schedule of Reports Document.

### **Masterplan Approach**

- 3.6. Pre-application planning advice was sought from the Council in relation to the proposed development of the Site for 24 dwellings.
- 3.7. The principle of development of the site is established through its allocation for housing development in the LPSS under policy A31. As such, pre-application discussions focused primarily on layout, scale, and massing of any proposed development of the site.
- 3.8. Two proposed site layout options were presented to Council officers for comment. Proactive discussions were held, and Council officers provided constructive feedback. This advice was heeded by the Applicant and has resulted in the layout proposed as part of this full application.
- 3.9. Preparation of the Masterplan has also been informed by the technical studies summarised in Section 5, and consideration of relevant planning policy considerations summarised in section 6. Figure 1 refers.



Figure 1 – Proposed Site Layout

- 3.10. The Masterplan approach has been informed by the location of the site access points, as well as the site's topography and drainage requirements. Furthermore, the proposed developed area will be situated away from key existing landscape features to retain the character of the area.
- 3.11. The Masterplan vision is to create a high-quality and considered development, that provides a range of dwelling sizes to meet different occupiers' needs. These will be set within a landscaped setting, with pedestrian and cyclist influences with links to existing public rights of way and the neighbouring developments, with plenty of green space and natural surveillance. The houses will be designed to respect and reflect the character of the area, so that the development has a bespoke design which is in keeping with the established and emerging local character.
- 3.12. The Masterplan approach, including in relation to design, is underpinned by a thorough contextual appraisal of the site and its surroundings. Full details are set out in the accompanying Design and Access Statement.
- 3.13. The vision is to be achieved through the following design principles included in the Masterplan design:
- Delivering a scheme which embodies the characteristics of the area.
  - Making optimum use of the land for the delivery of new homes, with development form and density appropriate to the location.
  - Delivering a development with a range of house sizes, types and tenures in response to local need.
  - Conserving and enhancing the landscape, ecology and natural resources around the site with green corridors and linkages.
  - Respecting the amenity and setting of neighbouring residential development.
  - Maximising the linkages between the site and surrounding area and provide opportunities for walking and cycling.
  - Developing an inclusive, safe and secure residential environment.

- Providing adequate on-site arrangements for vehicular access, servicing and parking, including the emergency services and statutory authorities.

3.14. The Design & Access Statement also sets out the following key landscape principles which the Masterplan is based upon:

- Maintains the open green character of the northern and eastern site edges;
- Retains the mature trees and hedgerows as important skyline features;
- Provides opportunities for public access and enhance visual connectivity to the surrounding countryside;
- Identifies opportunities for connections to existing public footpath;
- Provides an appropriate offset to Harpers Road and properties fronting the street;
- Enhances existing hedgerows and trees for wildlife and visual benefit;
- Provides connections across the site for wildlife and amenity benefit;
- Identifies opportunities for wildlife and amenity features, such as new woodland areas, streams, native hedgerows and wildflower meadows.

3.15. The principal elements of the scheme are summarised as follows:

- The scheme provides for 24 dwellings, to include an appropriate mix of house types, within a landscaped setting.
- The scheme will include a mix of housing tenures, with 40% affordable housing.
- Varied building heights, predominantly 2 storey, but including 1.5 development adjacent to the eastern boundary to Harpers Road to contribute to the transitional setting of the site in this location.
- Vehicular access from Harpers Lane with pedestrian routes through to neighbouring developments to create a permeable attractive safe environment for pedestrians and cyclists.
- Generous on-site provision of public open space to facilitate community interaction and provide high quality informal areas for play.



- The provision of generous areas for ecological enhancement, encouraging wildlife interaction.
- The use of wildlife corridors to the landscaped edges of the site, providing physical linkages to the edges of the development and providing areas for further significant ecological enhancement.
- Landscaping, including enhancement of the central woodland and planting along the eastern site boundary along Harpers Road.
- Associated biodiversity enhancements.
- Energy efficiency measures and electric vehicle charging points will be provided, which can be secured by condition.

3.16. The component parts of the scheme as summarised are below.

#### Access and Layout

- 3.17. Proposed Site Plan, Drawing No. 6502-PL-01M shows how the proposed site accesses will be laid out on the Site. As the site is formed of two distinct parcels, separated by a patch of woodland that runs centrally through the site, each parcel is to be served by its own vehicular access.
- 3.18. The southern site 'Streamside' will re-configure the existing access to provide a 5m wide road, suitable for refuse collection and delivery vehicles. The internal road network will be a shared surface suitable for both vehicles and pedestrian. Turning areas are provided on site to allow vehicles to turn and leave the site in a forward gear.
- 3.19. Access arrangements for the northern site will consist of a new 8m wide access off Harpers Road, approximately 80-metres to the north of the existing 'Streamside' access. The width of the access has been dictated by the swept path of refuse and delivery vehicles. Turning facilities are provided on site for the turning of vehicles.
- 3.20. Both vehicular accesses have been developed in line with DMRB standards and with the appropriate forward visibility. A pedestrian footpath will link the northern and southern parcels together with footway linkages into surrounding

developments forming the wider A31 policy allocation provided off the southern and western site boundaries.

- 3.21. Each of the proposed footway linkages within the site and to surrounding development will be 3m wide.

#### Land Uses

- 3.22. The technical assessments that have been undertaken in relation to the site are intended to support a scale of development for up to 24 dwellings, together with a means of access from Harpers Road.
- 3.23. The siting of the dwellings has been influenced by the location of existing development (outside of the Site boundaries), position of existing trees and their associated Root Protection Areas (RPAs), as well as general good design principles.
- 3.24. The Masterplan accommodates a range of dwelling types and sizes, laid out in two distinct groupings with the northern end of the site predominantly characterised by detached dwellings whilst the southern parcel mainly features pairings of semi-detached dwellings. The layout as proposed would create movement and variety within the future development. Consideration has been given to accommodating the requisite parking provision and garden amenity areas, as well as landscaped boundaries and public space.
- 3.25. As stated, the proposed layout and design has been arrived at via a collaborative process with Council officers. The acceptability of such an arrangement with regard to the development plan will be expanded upon in Sections 5 and 6 of this statement.

#### Dwelling Mix

- 3.26. The Scheme proposes 40% affordable housing (which equates to 9 dwellings based on the net 23 dwellings to be provided).
- 3.27. The remaining 15 market dwellings will comprise a range of 1 – 5 bedroom houses.

- 3.28. The development will allow for a mix of housing sizes, types and tenures, to meet the local needs identified in the most recent evidence base.

Affordable Housing Mix

- 3.29. The affordable housing provision meets the current policy requirement of 40% on sites of 11 or more dwellings as set out in LPSS Policy H2 and seeks to address the acute affordable housing need within the Borough.
- 3.30. In accordance with the approach set out in LPSS Policy H2 and the Council's Developer Contributions Supplementary Planning Document, the affordable housing component of the scheme (9 dwellings; 40% of the net additional dwellings) will comprise a tenure mix of:
- 2 x 1-bed flats (both to be First Homes)
  - 3 x 2-bed houses (1 First Home, and 2 Affordable Rent)
  - 4 x 3-bed houses (all 4 to be Affordable Rent)
- 3.31. The proposed affordable housing mix can be secured via legal agreement.

Landscaping

- 3.32. Although detailed planting schedules is usually a matter for planning conditions, the accompanying Structural Landscape Strategy provides an overview of the landscape principles to be applied. The strategy's objectives include:
1. A deliberate design objective for this scheme has been that it will act as a soft landscaped transitional buffer between 'our neighbours' on Harpers Road and the denser housing, and railway bridge to be constructed to the west, along with the rest of allocated site 'A31' to the west and south of our site.
  2. The underlying principles of the landscape strategy is to retain, enhance and manage the wooded area in the centre of the site.
  3. Retention of the existing landscape framework.

4. New native species hedgerows will be planted, which link to the existing enhanced hedgerows, and landscape areas to create wildlife corridors and connectivity around the boundaries.
5. Additional tree planting will be introduced.
6. New native planting will include fruit and seed bearing species to provide foraging opportunities. Formal planting areas will include plants beneficial to invertebrate pollinators. Log piles will be created to provide foraging opportunities for reptiles, bats and birds.
7. Within the northern part of the site the proposed houses are to be interspersed between the TPO trees, [respecting and avoiding their Root Protection Areas]. New trees and landscaping are to be planted to the boundary to Harpers Road to form a tree landscape band. Residential landscaping.
8. The site is to remain open with an informal planting layout.
9. For the southern part of the site the houses have been designed to reflect the discussions and layout requested by the Planning Officers'.
10. The houses to the far south have been located behind native hedging to directly view over the new access road.
11. To the boundary with Harpers Road the existing trees will be retained. The hard landscaping will be removed and replaced with an enlarged tree buffer.
12. A substantial planted area will be formed adjacent to plot 14, 16 and Oakside Cottage. The existing planting and trees will be retained, bramble removed and supplemented with additional planting. Trees and planting zones adjacent to plots 4 and 5, garages to plots 3-5 and plots 15 and 16 will provide a vista to the new drive which leads to the pedestrian and cycle path beyond.
13. Within the central woodland area, the invasive understorey species [and particularly the holly (ilex)] will be removed in accordance with the Biodiversity Management and Enhancement Strategy and Woodland Management Plan. Further details are contained within the submitted Woodland Management Plan and Biodiversity Management and Enhancement Strategy.

- 3.33. It is envisaged that the public spaces will be managed and maintained through the establishment of a Management Company, whilst the residential curtilage landscaping will be the responsibility of each plot owner.

Density

- 3.34. With a gross site area of 1.26ha, the density figure for the site is 19.2dph. This has been agreed through the pre-application process as being acceptable.

## 4. PLANNING HISTORY

- 4.1. The Application Site has been subject to two previous applications of relevance to this application.
- 4.2. The first is an outline application for the erection of 24 new houses to consider access, layout, and scale (LPA Ref: 17/P/02616). This application was dismissed at appeal on the 20th August 2019 for reasons which can be summarised as follows:
- 1) Harm to the character of the area
  - 2) Harm to the integrity of the Thames Basin Heath SPA
  - 3) Unacceptable impacts upon local infrastructure
- 4.3. There have been a material changes in circumstance affecting the site since this application was refused. Namely, the adoption of the LPDMP in 2023 and the approval and construction of several sites forming the wider A31 policy allocation in the LPSS. However, a number of comments made by the Inspector in this decision remain relevant and will be discussed throughout this statement.
- 4.4. The second application of relevance is an outline application for the demolition of the existing house and outbuildings and erection of 22 new dwellings with associated parking and creation of new vehicular access (all matters reserved except access, layout and scale (LPA Ref: 22/P/00977)).
- 4.5. Despite the proposal being formulated in a collaborative manner with Council officers, and there being no objection from any statutory consultee, this outline application for 22 dwellings was refused on the 26th June 2023 for the following reasons:
- 1) *Due to the nature and characteristics of Harpers Road, which is a narrow, rural road, the increased vehicle movements would create a dangerous environment for pedestrians and cyclists. The additional movements along Harpers Road created by the application would exacerbate and worsen the existing highway safety concerns. The proposal would therefore result in an unacceptable impact on highway safety, contrary to Policies ID3 and A31(10) of the Guildford Borough Local Plan: strategy and sites 2015 – 2034, the Strategic Development Framework SPD (2020), and NPPF paragraphs 110 and 111.*

- 2) *The proposed development would result in a material loss of privacy and overlooking to the occupants of Oakside Cottage which is located to the east of the site. The proposal would therefore result in an unacceptable impact on the amenity of this property, contrary to Policy D5(1a, b)(2b) of the Guildford Borough Local Plan: Development Management Policies (2023).*
- 3) *In the absence of a completed planning obligation the application fails to mitigate its impact on infrastructure provision. This includes the following:*
  - A. *the delivery of 8 (eight) affordable housing dwellings;*
  - B. *provision of SAMM contributions;*
  - C. *provision of SANG land to mitigate the impact of the development on the Thames Basin Heaths Special Protection Area;*
  - D. *contribution towards early years, primary and secondary education projects;*
  - E. *contribution towards open space provision infrastructure in the area;*
  - F. *contribution towards highway safety improvements and pedestrian and cyclist infrastructure improvements in the area;*
  - G. *contribution towards Ash Road Bridge; and,*
  - H. *provision that the Applicant, and successor in Title, gives free and unfettered access to the estate roads, pathways, and cycleways.*

*The proposal is therefore contrary to Policies P5, H2, ID1, ID3 and A31 of the Guildford Borough Local Plan: strategy and sites 2015-2034, saved Policy NRM6 of the South-East Plan (2009), Policy ID6 of the Guildford Borough Local Plan: Development Management Policies 2023, the Council's Planning Contributions SPD (2017), and the guidance contained within the NPPF paragraphs 55-57.*

- 4) *The site lies within the 400m to 5km zone of the Thames Basin Heaths Special Protection Area (TBHSPA). In the absence of a completed planning obligation, the Local Planning Authority is not satisfied that there will be no likely significant effect on the Special Protection Area and is unable to satisfy itself that this proposal, either alone or in combination with other development, would not have an adverse effect on the integrity of the Special Protection Area and the relevant Site of Special Scientific Interest (SSSI). The application would be contrary to the objectives of Policy P5 of the Guildford Borough Local Plan: strategy and sites 2015-2034, the Thames Basin Heaths Avoidance Strategy SPD, and saved Policy NRM6 of the South East Plan (2009). For the same reasons, the application would fail to meet the requirements of Regulation 63 of The Conservation of Habitats and Species Regulations (2017) as amended, and as the application does not meet the*

*requirements of Regulation 64, consequently the Local Planning Authority must refuse to grant planning permission.*

- 4.6. An appeal has been lodged to the Planning Inspectorate for application 22/P/00977 and is due to be considered by an informal hearing scheduled for February 2024.
  
- 4.7. In the following sections, this planning statement will outline how the proposed development has taken account of the material change in site circumstances and the previously given reasons for refusal resulting in a form of development that accords with the development plan when taken as a whole.



## 5. PLANNING POLICY ASSESSMENT

### General

- 5.1. This section summarises the planning policy position against which the acceptability of the scheme is determined.
- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out a requirement that planning applications are to be determined in accordance with the Development Plan unless other material considerations indicate otherwise. This represents the s.38(6) 'balance'.
- 5.3. The first test, and the statutory starting point is whether the application is *'in accordance with the plan'*, which is a phrase that has been the subject of debate in the High Court in the context of Section 54A of the Town and Country Planning Act 1990.
- 5.4. In his judgment of 31 July 2000 (R v Rochdale Metropolitan Borough Council ex parte Milne [2001] Env. L.R. 22), Mr Justice Sullivan concluded as follows:
- “...I regard as untenable the proposition that if there is a breach of any one Policy in a development plan a proposed development cannot be said to be “in accordance with the plan”...**
- ‘For the purposes of Section 54A, it is enough that the proposal accords with the development plan considered as a whole. It does not have to accord with each and every policy therein.’**
- 5.5. The Rochdale judgment is applicable to the interpretation of Section 38(6) of the 2004 Act such that the decision maker must reach a decision as to whether the proposal is in accordance with the development plan when it is considered as a whole, which position is set out below.
- 5.6. Such matters (the tensions between development plan policies) have more recently been considered in Corbett v Cornwall County Council [2020] EWCA

Civ 508 (Case No. C1/2019/2179) (April 2020). This judgment reaffirms the position that it is enough that the proposal accords with the development plan considered as a whole, such that a proposal does not have to accord with each and every policy therein in order to be development plan compliant.

- 5.7. For the reasons set out below, it is submitted that the Application Scheme accords with the development plan when taken as a whole, such that the presumption in s. 38(6) of the Planning and Compulsory Purchase Act 2004 is in favour of the development.
- 5.8. Additionally, the NPPF is a material consideration of particular standing in the determination of planning applications. This includes the context provided by paragraph 11 concerning the presumption in favour of sustainable development.
- 5.9. Section 39 of the 2004 Act identifies the requirement for decision-makers to exercise their functions with the objective of contributing to the achievement of sustainable development.
- 5.10. These requirements must be considered in light of the NPPF, including the three roles of sustainability set out at paragraph 8 (economic, social and environmental). However, and as set out at paragraph 9 of the NPPF, the three roles are not a checklist and their values are considered below in light of that context.

### **The Development Plan**

- 5.11. At the local level, the development plan for the purpose of S38(6) comprises as follows:
  - Guildford Borough Local Plan: Strategy and Sites 2015-2034 (LPSS) (2019)
  - Guildford Borough Local Plan: Development Management Policies (LPDMP) (2023)
  - The South East Plan (2009): (revoked 2013); retained policy NRM6 Thames Basin heath Special Protection Area (SPA)

Guildford Borough Local Plan: Strategy and Sites 2015-2034

- 5.12. The LPSS was adopted in April 2019 and sets out the overarching strategy in seeking to meet development needs in the period 2015-2034.
- 5.13. The LPSS requires a minimum of The Local Plan requires a minimum of 10,678 dwellings over the period 2015-2034, to be delivered in the Borough. As such, Guildford Borough’s housing requirement equates to 562 dwellings per annum.
- 5.14. The Application Site is allocated in the LPSS, under Policy A31, for residential uses. Whilst the Application Site only forms part of the A31 policy allocation, the allocation as a whole is relied upon to deliver 1,750 dwellings.
- 5.15. A summary of the relevant policy considerations is set out below.

Local Plan: Strategy and Sites Policy	Policy Summary and Assessment
Policy S1: Presumption in Favour of Sustainable Development	<p>This policy sets out how the Council will approach decision making. Namely, approving development that accords with the development plan without delay or, where the most important policies are out of date, granting permission unless material considerations suggest otherwise.</p> <p><b>The application site forms part of the A31 policy allocation for housing. As such, the principle of development of the site is established. As is detailed in the remainder of this policy assessment, the proposed development accords with the development plan, when taken as a whole, and therefore benefits from the presumption in favour of sustainable development.</b></p>
Policy S2: Planning for the Borough – Our Spatial Strategy	<p>This policy details the housing requirement over the plan period, 10,678 dwellings, and outlines where development will be directed throughout the borough to achieve this.</p> <p><b>As stated, the proposed development would be located upon an allocated site. The proposal therefore complies with Policy S2</b></p>
Policy H1: Homes for All	<p>Policy H1 requires new development to provide a mix of dwelling sizes in accordance with the latest published evidence base and that all dwellings meet nationally described space standards</p>

	<p><b>The proposed development will result in a net gain of 23 dwellings which includes the following mix of dwellings:</b></p> <p><b>2 no. 1 bed flats</b>  <b>4 no. 2 bed houses</b>  <b>14 no. 3 bed houses</b>  <b>2 no. 4 bed houses</b>  <b>2 no. 4/5 bed houses.</b></p> <p><b>This is broad range of dwelling sizes which will deliver a wide choice of homes to meet a range of accommodation needs. This reflects the comments made at paragraph 48 in the Inspector’s Final Report on the LPSS:</b></p> <p><i>“as regards housing mix, the policy is not prescriptive but seeks a mix of tenure, types and sizes of dwelling, which the text indicates will be guided by the strategic housing market assessment. The policy also seeks an appropriate amount of accessible and adaptable dwellings and wheelchair user dwellings”</i></p> <p><b>Moreover, when assessing the previous application for 22 dwellings (LPA Ref: 22/P/00977), at paragraph 7.2.9 said:</b></p> <p><i>“While it is acknowledged that the proposed mix is slightly different to the SHMA guidance, it is noted that the SHMA mix is to be achieved over the whole of the housing market area and over the lifetime of the Plan. The flexibility set out in the policy must be used to achieve an acceptable mix across the borough. The application is not likely to cause any material harm to the Council's ability to deliver a compliant SHMA mix on a wider basis and overall, the proposed mix is deemed to be acceptable.”</i></p> <p><b>It is considered that the proposed dwelling mix would not prejudice the Council’s ability to secure the SHMA mix over the plan period and is acceptable in its own right.</b></p> <p><b>The supporting floor plans evidence that each of the proposed dwellings will meet nationally described space standards. As such, the proposal accords with all applicable criteria of Policy H1.</b></p>
<p>Policy H2: Affordable Homes</p>	<p>Policy H2 of the requires H2(2) <i>‘the Council seeks at least 40% of the homes on application sites to be affordable’</i>; and, H2(4) <i>‘the tenures and number of bedrooms of the affordable homes provided ...must contribute, to the Council's satisfaction, towards meeting the mix of affordable housing needs identified in the Strategic Housing Market Assessment 2015, or subsequent affordable housing needs evidence’</i> as concluded with the Council’s Housing Officer.</p> <p><b>The proposed development will provide 9 affordable dwellings, being 40% of the 23 net additional dwellings</b></p>

	<p><b>created on an allocated site within the settlement boundary. The proposal complies with Policy H2.</b></p>
<p>Policy P4: Flooding, Flood Risk and Groundwater Protection Zones</p>	<p>Policy P4 requires all development proposals to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off.</p> <p><b>As detailed in the supporting FRA, surface water runoff will drain into a series of geo-cellular soakaways located within the landscaped areas of the Site. The size of these soakaways is sufficient to cater for the 1 in 100 year plus 40% climate change event. Such an arrangement was considered acceptable by the LLFA when assessing previous application (22/P/00977) and the 24 dwelling scheme (17/P/02616)). As such, it is considered the proposal accords with Policy P4.</b></p>
<p>Policy P5: Thames Basin Heaths Special protection Area</p>	<p>Policy P5 requires new development to avoid adverse effects upon the integrity of the Thames Basin Heath Special protection Area.</p> <p><b>An Appropriate Assessment is included at Appendix 6 of the supporting Ecological Impact Assessment. This assessment concludes that subject to the payment of a SAMM contribution, and the securing of a minimum of 0.44ha of SANG capacity, the proposed development will not result in adverse effects upon the integrity of the Thames Basin Heaths SPA.</b></p> <p><b>When assessing the previous schemes, it was considered an acceptable approach to impose a Grampian condition to secure the necessary SANG. It is considered that such a mechanism is suitable for this proposal.</b></p> <p><b>Regarding the SAMM contribution, this can be secured via legal agreement.</b></p> <p><b>It is considered that, with the imposition of a Grampian condition and the signing of a legal agreement, the proposed development will not result in an adverse effect upon the integrity of the Thames basin heaths SPA in accordance with policy P5.</b></p>
<p>Policy D1: Place Shaping</p>	<p>Policy D1 Place (LPSS) shaping, requires all new development to: ‘...achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set’</p> <p><b>The design of the proposed development has been arrived at through a collaborative process with Council Officers involving pre-application prior to the submission of application 22P/00977, during the consideration of application 22/P/00977, and prior to submitting this scheme proposal with meetings held in September 2023.</b></p> <p><b>In the northern parcel of the site, it is proposed that the dwellings fan around a large retained oak tree with outward</b></p>

facing frontages. The southern parcel is arranged in a more traditional 'L' shape with gardens facing outwards toward neighbouring development. Across both parcels, parking provision has been sited between dwellings to ensure the resulting development does not appear cluttered – a design feature that was supported by Officers when assessing the previous 22 dwelling scheme. The layout for the north part of the site was considered acceptable by the appeal inspector for 17/P/02616. (see paragraph 10 of the decision letter dated 20 August 2019).

By virtue of the wider A31 Policy allocation covering most of the neighbouring landscape, it is inevitable that the local landscape will change – a sentiment acknowledged in part 5) of this policy. However, it is recognised that, due to its edge of settlement location, the proposed development should act as a transition between the existing countryside to the east and new development to the west and south. As such, retention, reinforcement, and enhancement of landscaped buffers along the eastern and northern site boundaries are proposed to soften the development in the wider landscape.

As evidenced by the supporting proposed elevation plans, similar house types, materials and landscaping details to that forming the Wildflower Meadow are proposed to help create a more cohesive pattern of development. This has the benefit of allowing development to be read as a singular extension rather than as fragmented parcels.

Footway/cycle linkages are proposed along the western and southern site boundaries to link into the neighbouring developments forming the wider A31 policy allocation. A pedestrian footway through the small patch of woodland that runs through the site will link the northern and southern parcels together. This link will benefit from natural surveillance provided by dwellings in both parcels of the proposed development. The same is true of the internal road network, with active frontages addressing the roads and pedestrian links to neighbouring development.

Care has been taken to ensure each of the proposed dwellings maximises solar gain by being orientated in a predominantly east/west direction or with significant south facing elevations and roof planes.

Regarding infrastructure to create smart places, facilities to allow easy upgrade of broadband/fibre services will be incorporated on site.

Overall, it is considered the proposed development creates a high-quality environment that is adaptable to future technological changes. As such, the proposed development accords with policy D1.

<p>Policy D2: Climate Change, Sustainable Design, Construction and Energy</p>	<p>Policy D2 requires that (4) ‘Proposals for major development are required to set out in a sustainability statement how they have incorporated adaptations for a changing climate...’ and, (9) ‘New buildings must achieve a reasonable reduction in carbon emissions of at least 20 per cent measured against the relevant Target Emission Rate (TER) set out in the Building Regulations 2010 (as amended) (Part L).’</p> <p><b>The desire to maximise energy efficiency is a core tenant of the proposed development. As detailed in the accompanying Energy Statement, the proposal has incorporated measures in accordance with the energy hierarchy, namely:</b></p> <p><b>Be lean – A passive design ‘fabric first’ approach has been taken with the dwellings incorporating energy-efficient materials such as double-glazing and insulative wall materials. In addition, and as previously discussed in this statement, the orientation of the proposed dwellings is such that solar gain is maximised.</b></p> <p><b>Be Clean – Certain dwellings, where the installation photovoltaics is not feasible, will be serviced by air source heat pumps.</b></p> <p><b>Be Green – Conversely, dwellings will incorporate photovoltaics where feasible.</b></p> <p><b>Both Solar PV &amp; ASHP technologies, along with an efficient building fabric, would provide a sufficient DER/TER improvement to satisfy Building Regulations Part L 2021, and thus meet the requirements of Planning Policies D2 (Climate Change, Sustainable Design, Construction &amp; Energy) &amp; D16 (Carbon Emissions from Buildings).</b></p>
<p>Policy D3: Historic Environment</p>	<p>Policy D3 seeks to conserve and enhance the historic environment. If a proposal results in harm to a designated heritage asset, the benefits of the scheme will be weighed against the identified harm in accordance with the NPPF.</p> <p><b>The site is within the vicinity Grade II listed York House and Ash Manor. As detailed in the supporting heritage statement, the proposed development would have a ‘low negative impact’ upon these heritage assets.</b></p> <p><b>The Local Planning Authority has with previous proposals confirmed that the impact of the proposals to be less-than-substantial harm identified at the lower end of the spectrum.</b></p> <p><b>As harm to a heritage asset has been identified, albeit a low level of harm, the benefits of the proposed development must be weighed against the purported harm to the heritage asset in accordance with paragraph 202 of the NPPF.</b></p> <p><b>It is of relevance that the previous application for 22 dwellings was not refused on heritage grounds and the</b></p>

	<p><b>balancing exercise undertaken in the determination of that application is of relevance here. Below is a list of the benefits previously identified by council officers:</b></p> <ul style="list-style-type: none"> <li>- The provision of 22 dwellings in a mix generally compliant with the development plan.</li> <li>- The delivery of 8 affordable houses</li> <li>- The delivery of a network of pedestrian and cycle routes through the development</li> <li>- Retention and enhancement of the woodland and stream on-site</li> <li>- The provision of an extensive woodland habitat and framework surrounding the development that will increase biodiversity</li> <li>- Financial contributions towards the Ash Road Bridge scheme and community facilities in the area.</li> </ul> <p><b>Similarly the previous proposal for 24 dwellings determined in 2019, the above considerations would have been considered.</b></p> <p><b>This proposal enhances some of these benefits by providing additional dwellings (24), an additional affordable dwelling (9) and increased financial contributions towards off-site infrastructure. This proposal also retains the connectivity and biodiversity benefits previously identified too.</b></p> <p><b>It is considered that the benefits of the proposed development clearly outweigh the identified harm to a heritage asset in accordance with paragraph 202 of the NPPF. As such, the proposed scheme accords with Policy D3.</b></p>
<p><b>Policy ID3: Sustainable Transport for New Developments</b></p>	<p><b>Policy ID3 requires new development to contribute to the delivery of an integrated, accessible, and safe transport system, maximizing the use of sustainable transport modes.</b></p> <p><b>Permeability has been entwined into the design of the proposed development. As already discussed, the proposed layout features a number of pedestrian/cycle links into neighbouring development, helping to create a sustainable linkage through the wider A31 policy allocation towards Ash.</b></p> <p><b>As shown on the proposed site plan (Drawing no. 6502-PL-01M), each of the proposed dwellings will benefit from on-plot secure cycle storage in the form of garden sheds except for plots 12 &amp; 13 which benefit from a shared cycle store located adjacent to their allocated parking spaces.</b></p> <p><b>The proposed site plan also details how policy compliant levels of parking provision can be accommodated on-site.</b></p> <p><b>The supporting transport statement details the sustainability merits of the proposed development by identifying the wide</b></p>



	<p>range of public transport options available within the vicinity of the site.</p> <p>In addition, improvements to local transport infrastructure, in particular the Ash Road Bridge scheme, can be secured via S106 agreement.</p> <p>It is considered that these measures combined satisfy the requirements of Policy ID3.</p>
<p>Policy ID4: Green and Blue Infrastructure</p>	<p>This policy requires new development to protect and enhance the blue and green assets of the site in which it is located. It also requires for new development to provide, or contribute to, the provision of public open space.</p> <p>The site is not within or adjacent to a Biodiversity Opportunity Area and matters regarding the Thames Basin Heath SPA have been addressed in the proposal's assessment against Policy P4 (see above). Nor is the site located upon designated Open Space.</p> <p>The LPSS was subject to a Habitats Regulation Assessment which concluded that, given the site is allocated within the Local Plan, development of the site will not have a significant effect upon the nearby Thursley, Ash, Pirbright &amp; Chobham SAC. This SAC designation also covers the nearby Ash to Brookwood Heath SSSI.</p> <p>Regarding biodiversity, a Biodiversity Management and Enhancement Strategy has been produced in support of the proposed development. This strategy has been informed by a suite of surveys including, but not limited to, badgers, reptiles, birds, dormouse, flowers and fauna. The strategy also looks ahead to the forthcoming requirements of the Levelling Up and Regeneration Bill which will require development to achieve a minimum 10% net gain in biodiversity. The strategy states that:</p> <p><i>“The Layout of the Site has ...the additional provision of newly created woodland habitat south of the existing woodland to be retained by way of compensating for this small loss. Following the revised layout an updated Biodiversity Net Gain Metric 4 calculation has been undertaken. The Site now demonstrates a biodiversity net gain of 15.79% for habitat units and 139.00% hedgerow units.”</i></p> <p>In order to achieve a 20% net gain as per the requirements of the Guildford Borough Local Plan an additional 0.2 habitat units are required. The appropriate number of biodiversity units will need to be secured with a local offset provider</p> <p>The proposal also incorporates measures to enhance the recreational value of the watercourse that runs through the site. Additional planting will reinforce the existing</p>

	<p><b>surrounding woodland, enhancing the ecological value of the watercourse.</b></p> <p><b>As such, it is considered that the proposal fully complies with Policy ID4</b></p>
<p>Policy A31: Land to the South and East of Ash and Tongham</p>	<p>This Policy details the criteria that development upon this allocated site must meet. Including, but not limited to matters of interconnectivity, design and landscaping.</p> <p><b>The proposed development can secure proportionate contributions towards the identified infrastructure projects by way of a suitably worded legal agreement. In addition, the development will secure a significant CIL contribution which can be utilised for off-site infrastructure improvement projects.</b></p> <p><b>As already discussed, the proposal includes interconnectivity and permeable pedestrian/cycle routes to link into the wider A31 allocation.</b></p> <p><b>By virtue of compliance with Policy ID4, the proposal accords with the landscaping and biodiversity elements of this policy.</b></p> <p><b>The sustainable transport and interconnectivity requirements are addressed by way of compliance with Policy ID3</b></p> <p><b>The supporting Flood Risk Assessment confirms that appropriate surface water management infrastructure can and will be incorporated into the proposed development (see response to Policy P4 above).</b></p> <p><b>It is therefore considered that the proposal accords with the requirements of Policy A31.</b></p>

5.16. In the circumstances, the presumption in favour of sustainable development is applied on account of the proposed development according with the development, when taken as a whole, as prescribed by paragraph 11(c) of the NPPF.

Guildford Borough Local Plan: Development Management Policies

5.17. Whilst the LPSS sets out the broad planning framework for the area, the LPDMP sets out the detailed proposals and policies in order to implement the development objectives for the borough.

Local Plan: Development Management Policy	Policy Summary and Assessment
Policy H7: First Homes	<p>This Policy requires that 25% of provided affordable housing must be provided as First Homes.</p> <p><b>The proposed development will secure 9 affordable houses (being 40% of the 23 net additional dwelling provided). A policy compliant number of these affordable houses can be secured as First Homes by way of a S106 legal agreement.</b></p> <p><b>As such, the proposal complies with Policy H7.</b></p>
Policy P6: Protecting Important Habitat and Species	<p>Policy P6 seeks to preserve and protect irreplaceable and priority habitats and species.</p> <p><b>It is confirmed in the assessment of the previous scheme for 22 dwellings that there are no veteran trees within the Site. However, the northern part of the site is subject to a Tree preservation order (GBC TPO 3 2017). This application is supported by an Arboricultural Impact Assessment, Tree Protection Plan and an Arboricultural Method Statement which concludes that:</b></p> <p><b><i>“The proposed houses can be built with minimal impact [on the tree] surrounds. Full provision can be made for the protection of existing trees to ensure their continued viability following the completion of construction works”</i></b></p> <p><b>An Ecological Impact Assessment has also been produced in support of this application. This assessment includes a suite of species surveys including, but not limited to, badgers, reptiles, birds, dormouse, flowers and fauna. The report concludes that, subject to mitigation measures (which can be secured via condition), the proposed development would not result in any adverse effects upon protected or notable species identified on and near the site.</b></p> <p><b>The proposal therefore complies with Policy P6</b></p>
Policy P7: Biodiversity in New Developments	<p>Policy P7 requires new development to enhance the biodiversity value of a development through a design led-approach. Where possible, existing habitats of value are to be retained and any proposed landscaping scheme should enhance the biodiversity value of the site.</p> <p><b>As detailed when discussing Policy ID4 (see above), the proposed development can achieve the required on-site biodiversity net gain.</b></p> <p><b>Regarding site design, a comprehensive landscaping strategy seeks to maximise the quality of on-site habitat. The central woodland is to be enhanced and supplemented with native planting ensuring policy compliant levels of canopy</b></p>

	<p>cover, as is the case for the on-site hedgerows. As can be seen on the submitted site layout plan (Drawing no. 6502-PL-01M) the proposed landscaping creates a connected and cohesive habitat corridor across the site.</p> <p>As detailed when assessing the proposal against Policy P4 (above), the SuDS strategy for the site has been incorporated into the landscaping of the development.</p> <p>The supporting Ecological Impact Assessment prescribes the installation of bird and bat boxes which can be included on the proposed dwellings.</p> <p><b>Overall, it is considered the proposal accords with Policy P7.</b></p>
<p>Policy P9: Air Quality and Air Quality Management Areas</p>	<p>This policy requires new development to, where possible, improve air quality.</p> <p>It is pertinent to recall comments made by the Council's Environmental Health Officer in response to the previous application for 22 dwellings, who, in their consultation response said:</p> <p><i><b><u>“if the application is being considered for approval, I will ask the developer to submit an Air Quality Report. The report does not need to carry out modelling/monitoring exercise to assess the air quality impact of the proposed development, but must focus on air quality measures to control emissions during construction phase and good design principles ( air-qualityplanning-guidance.pdf (iaqm.co.uk) ) so that the proposed development will have least impact on the existing air quality in the area’. (our emphasis)</u></b></i></p> <p>It is considered that such an approach to an air quality assessment is applicable to this application. Such measures to mitigate air quality impacts can be incorporated into a construction and environmental management plan (CEMP) which can be secured via condition.</p> <p><b>As such, it is considered the proposal complies with Policy P9.</b></p>
<p>Policy P10: Water Quality, Waterbodies, and Riparian Corridors</p>	<p>Policy P10 requires development, where applicable, to retain and enhance the value of waterbodies on/near the development site.</p> <p><b>By virtue of compliance with policies ID4, P7 and P6, the proposed development complies with Policy P10</b></p>
<p>Policy P11: Sustainable Surface Water Management</p>	<p>Policy P11 requires new development to effectively manage surface water runoff. This is to be achieved through the implementation of drainage schemes and SuDs strategies.</p> <p><b>Environment Agency mapping identifies the site as being wholly located within Flood Risk Zone 1, placing it at the lowest end of the flood risk scale. Environment Agency mapping also identifies that the site has a less than 1 in 1000 annual probability of river flooding.</b></p>

	<p>The supporting Flood Risk Assessment and Drainage strategy details how the proposed SuDS strategy will achieve runoff rates and volumes consistent with greenfield conditions.</p> <p>As detailed in the supporting FRA, surface water runoff will drain into a series of geo-cellular soakaways located within the landscaped areas of the Site. The size of these soakaways is sufficient to cater for the 1 in 100 year plus 40% climate change event. Such an arrangement was considered acceptable by the LLFA when assessing previous application (22 dwelling ref). As such, it is considered the proposal accords with Policy P11</p>
<p>Policy D4: Achieving High Quality Design and Responding to Local Distinctiveness</p>	<p>This policy seeks to secure high-quality design that responds to, and enhances, the character of its locality.</p> <p><b>As discussed in response to policies D1 and A31 (see above), the proposal will secure a high-quality design that will respect and enhance the local landscape.</b></p>
<p>Policy D5: Protection of Amenity and provision of Amenity Space</p>	<p>Policy D5 requires new development to provide sufficient internal and external amenity space for future occupiers. It also requires that new development does not prejudice the amenity and privacy of existing neighbouring properties.</p> <p><b>It is acknowledged by virtue of reason for refusal 2 given against the previous outline application for 22 dwellings (LPA Ref:22/P/00977) that the protection of amenity of Oakside Cottage is a matter to be considered. A detailed comparison between the previously proposed layout and that proposed here is undertaken in the ‘Main Issues’ section of this statement.</b></p> <p><b>To ensure the amenity of existing dwelling, Oakside Cottage, is retained, a number of design measures have been implemented. Such measures have been informed by the Council’s Residential Design Guide, principles from the Council’s residential Extension SPD and collaborative pre-application discussions with Council Officers. As assessment of the amenity impacts is discussed in Section 6.</b></p> <p><b>Regarding private amenity space, particular regard is had to paragraph 5.31 of the LPSS which states:</b></p> <p><b><i>“Private outdoor amenity space should be sufficient to accommodate a table and chairs, a garden shed/storage box if there is no additional storage provided as part of a garage, refuse and recycling bins, an area to dry washing, circulation space, areas for planting and, for family homes, an area for children to play in.”</i></b></p> <p><b>Proposed dwellings 1-11 and 14-24 will be serviced by private gardens whilst the 1-bedroom flats (plots 12 &amp; 13) will</b></p>

	<p>benefit from a shared outdoor amenity space. Care has been taken to ensure that all amenity space serving these dwellings benefits from access to direct daylight and that all can accommodate the requirements of paragraph 5.31 relative to the size of dwelling they will serve. Each garden serving a house is no smaller than the footprint of the dwelling it will serve. Each of the proposed gardens are largely rectangular to ensure the amenity space provided is functional.</p> <p>To secure the amenity of these private gardens, careful consideration has been taken regarding the orientation and layout of the proposed dwellings. In the northern part of the site, the dwellings are set at oblique angles to each other, and intervening landscaping is proposed to minimise invisibility. Plots 17 and 22 achieve a rear to rear separation distance of approximately 28m and proposed tree planting in the gardens of these dwellings will further obscure intervisibility.</p> <p>In the southern part of the site, plots 3-11 are arranged in typical groupings of semi-detached pairs. Such an arrangement is wide-spread and will not give rise to adverse effects upon the amenity of each property. Plots 3 and 4 will face toward the garden of plot 1, separated by approximately 20m. In addition to this significant separation distance, garaging serving plots 3-5 and a car barn serving plot 1 will occupy the space between these dwellings, further reducing intervisibility.</p> <p>The proposed development will respect and maintain the amenity of existing dwellings whilst securing ample amenity for each of the proposed dwellings. As such, the proposal accords with <b>Policy D5</b>.</p>
Policy D6: External Servicing Features and Stores	<p>This policy seeks to secure sufficient cycle storage, bin storage and EV charging points to service a proposed development. It also requires the design of such features to be high-quality and sensibly located.</p> <p><b>As evidenced by the proposed site layout plan (Drawing No. 6502-PL-01M), all houses will benefit from large gardens and sheds which can accommodate bin and cycle storage. The plan also shows EV charging points serving each of the dwellings.</b></p> <p>The flatted units are serviced by a shared shed/bike storage unit located to the east of the parking space serving plot 12. A small bin collection point for these dwellings is located within a landscaped verge to the south of the parking space serving plot 13. The scale of this provision is proportionate to the number of dwellings it will serve and has been sensitively designed and sited so as not to result in any adverse effects upon the visual amenity of the development.</p>

	<b>The proposal therefore complies with Policy D6.</b>
Policy D7: Public Realm	<p>This policy requires new development to provide and secure the maintenance of a high quality public realm that is informed by the local context.</p> <p><b>This is a requirement of Policy A31. As such, It is considered the proposal fully meets the criterial of Policy D7.</b></p>
Policy D11: Noise Impacts	<p>Policy D11 seeks to mitigate the impacts of noise generated by development upon sensitive receptors.</p> <p><b>When consulted upon the previous scheme for 22 dwellings, the Council's Environmental Health Officer raised no objection to the scheme on noise grounds. The officer report detailed the scope of the acoustic survey required to be focused upon the impacts during construction and good design principles. The mitigation measures during construction can be secured as part of a CEMP whilst the deign principles of the development have been discussed in detail in this wider policy assessment. It is considered the proposal complies with Policy D11.</b></p>
Policy D12: Light Impacts and Dark Skies	<p>Policy D12 requires development to incorporate a sensitive lighting strategy that will minimise obtrusive light upon sensitive receptors (neighbouring properties, habitats).</p> <p><b>Such a strategy can be secured via planning condition to ensure compliance with Policy D12.</b></p>
Policy D14: Sustainable and Low Impact Development	<p>Policy D14 requires new development to achieve high levels of sustainability by incorporating a range of energy and water efficiency design measures.</p> <p><b>The supporting energy statement details how a fabric-first approach to energy efficiency has been taken. Measures proposed to reduce the energy consumption of the proposed dwellings include:</b></p> <ul style="list-style-type: none"> <li>- <b>Insulation to reduce heat loss</b></li> <li>- <b>Installation of low energy lighting, energy efficient boilers and appliances</b></li> <li>- <b>The installation of air source heat pumps or photovoltaic panels (the most appropriate option per dwelling)</b></li> <li>- <b>Orientation of the dwellings to maximise solar gain</b></li> </ul> <p><b>Where possible, building materials will be sourced locally and sustainably to mitigate carbon impacts during development and across the lifespan of the building.</b></p> <p><b>A Site Waste Management Plan can be secured as part of a CEMP.</b></p> <p><b>Water use will be a maximum of 110 litres per occupant per day, which complies with Policy.</b></p>
Policy D15: Climate Change Adaption	<p>Policy D15 requires new development to be resilient and adaptable to handle the expected impacts of climate change over the lifetime of the development.</p>

	<p><b>By way of compliance with policies D2, D14 and P11 (see above), the proposal complies with the requirements of Policy D15</b></p>
Policy D16: Carbon Emissions from Buildings	<p>This policy requires new development to meet the standards of Part L of the Buildings Regulations and, where possible, to utilise low/zero carbon and decentralised energy sources.</p> <p><b>As discussed in response to policies D2, D14 and D15, the proposed development will secure highly energy efficient and low carbon housing</b></p>
Policy D18: Designated Heritage Assets	<p>Policy D18 requires proposals constrained by a heritage asset to be accompanied by a heritage statement detailing the harm, if any, to the asset. If harm is identified to a heritage asset, a balancing exercise must be undertaken in accordance with national policy.</p> <p><b>As detailed in the response to Policy D3 (see above), a balancing exercise has been undertaken which concludes the benefits of the scheme clearly outweigh the identified harm to nearby heritage assets. The proposal therefore complies with Policy D18.</b></p>
Policy ID6: Open Space in New Developments	<p>Policy ID6 requires that ‘Development proposals that would result in a net increase in number of residential units are required to provide or fund open space based on the expected occupancy of the new development and the quantity standards set out in Table ID6a and ID6b</p> <p><b>When assessing the previous application for 24 dwellings (LPA Ref: 17/P/02616) the case officer determined that the provision of small areas of amenity green space at the northern edge of the site created an “attractive pedestrian connection” and the omission of on-site play equipment is acceptable due to the close proximity of Harper’s recreational ground. The design of the northern section of the site remains the same here and therefore is acceptable. The proposal complies with policy ID6.</b></p>
Policy ID9: Achieving a Comprehensive Guildford Borough Cycle Network	<p>Policy ID9 requires development to incorporate cycle routes and infrastructure to contribute towards the wider Guildford Borough Cycle Network.</p> <p><b>By virtue of compliance with Policy A31, which requires interconnectivity to surrounding development, the proposed development will create additional cycle links through the site in accordance with Policy ID9.</b></p>
Policy ID10: Parking Standards for New Developments	<p>This policy requires development to provide resident and visitor parking spaces in accordance with the parameters listed in Appendix B of the LPDMP.</p> <p><b>As evidenced by the supporting site layout plan, the proposed development provides the requisite resident and visitor parking provision. The proposed therefore accords with Policy ID10.</b></p>



### Summary

5.18. As outlined throughout this statement, the scheme provides a number of significant benefits upon an allocated site. As such, it is considered that the proposed development accords with the development plan, when taken as a whole, and benefits from the presumption in favour of sustainable development a set out at paragraph 11 (c) of the NPPF.

### **Material Considerations**

5.19. There are a number of material considerations relevant to the assessment of the application, including, but not limited to the following:

- The NPPF
- The PPG
- The National Design Guide
- Guildford Borough Council SPDs
- Appeal Decisions and Case Law
- Five Year Housing Land Supply
- Affordable Housing Need and Supply

5.20. The material considerations are considered below.

### **National Planning Policy Framework**

5.21. The National Planning Policy Framework (NPPF) was most recently updated in September 2023. It is a material consideration of particular standing in the determination of planning applications.

5.22. The content of the NPPF as it relates to the proposed development of the application site is addressed in the order set below:

- The presumption in favour of sustainable development
- Decision making

- Delivering a sufficient supply of homes
- Promoting sustainable transport
- Achieving well-designed places
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment

5.23. Paragraph 8 of the NPPF identifies that there are three dimensions to sustainable development, comprising (i) economic, (ii) social; and (iii) environmental.

#### Economic Role

5.24. The economic role requires the planning system to, inter alia, ensure that sufficient land of the right type is available in the right places and at the right time to support growth. This is achieved with the application scheme on the basis that it is located within a sustainable location, within walking and cycle distance to local services and facilities. The scheme also provides for housing development of the type and mix required to meet identified needs.

5.25. The scheme further addresses the economic role in terms of increased LPA Revenues, Construction impacts (increased GVA, jobs etc.) and increased expenditure in local area.

#### Social Role

5.26. The social role requires the planning system to provide the supply of housing required, creating a high-quality built environment, accessible to local services and reflecting the community's needs. All these requirements can be achieved with the application scheme.

### Environmental Role

- 5.27. The environmental role requires the planning system to protect and enhance the natural, built and historic environment. This can be achieved with the proposal in a location that will not result in any significant adverse effects upon the character of the surrounding area, including in landscape terms.

### Decision Making

- 5.28. Section 4 of the NPPF sets out the approach to decision making. Paragraph 38 makes it clear that decision-makers at every level should seek to approve applications for sustainable development where possible.
- 5.29. The Application Site is located in a sustainable location, on an allocated site, and will improve the economic and social conditions of the area. It will also help to provide public open space and enhanced biodiversity habitats, both on and off site.

### Delivering a Sufficient Supply of Homes

- 5.30. Paragraph 60 sets out the Government's objective of significantly boosting the supply of homes.
- 5.31. Paragraph 61 sets out the approach to determining the minimum number of homes needed, which should be informed by a local housing need assessment conducted using the Standard Method in national planning guidance – unless an alternative approach is justified. It is also added that any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 5.32. Paragraph 68 sets out the need to provide a five-year supply of deliverable sites for housing. It also requires sites for years 6-10 and beyond.

### Promoting Sustainable Transport

- 5.33. Section 9 sets out the approach to providing for sustainable growth.

5.34. Paragraph 104 requires transport issues to be considered from the earliest stages of development proposals in order to, inter alia, identify opportunities to promote walking, cycling and public transport use are identified and pursued.

5.35. Paragraph 105 states as follows.

**“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making’.**

5.36. Paragraph 110 requires applications for development to take opportunities to promote sustainable transport modes, achieve safe and suitable access and to mitigate the impacts of trip generation on the highway network.

5.37. Paragraph 111 makes it clear that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

5.38. In highway and accessibility terms, the Site is located on an allocated site, within walking distance to local services and facilities, and within reach of larger settlements via readily accessible public transport. The supporting TS also demonstrates the acceptability of the Scheme in sustainability and highway terms, concluding in relation to the acceptability of the trip rates from the proposal upon the highway network. Accordingly, the Scheme is consistent with section 9 of the NPPF.

#### Achieving Well-Design Places

5.39. Section 12 of the NPPF sets out the aspirations for well-designed places, requiring beautiful and sustainable buildings.

- 5.40. The desire for well-designed places requires careful consideration of what makes ‘the place’ and how schemes can be designed to embrace the building beautiful agenda.
- 5.41. One element of well-designed places includes the requirement for landscaped masterplans and provision of tree-lined streets.
- 5.42. As set out at paragraph 134 of the NPPF, development reflecting local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides attracts significant weight.
- 5.43. The accompanying DAS comprehensively explains the appropriateness of the overall design response in the content of the design approach advocated in the NPPF and the Council’s design guides and policies.

#### Meeting the Challenge of Climate Change and Coastal Change

- 5.44. Section 14 sets out the approach to supporting the move towards a low carbon future as well as the approach to the management of development and flood risk.
- 5.45. These requirements are addressed in the accompanying Energy and Sustainability Statement and the Flood Risk Assessment and Drainage Strategy.

#### Natural Environment

- 5.46. Section 15 sets out the approach to conserving and enhancing the natural environment.
- 5.47. Paragraph 174 states that planning policies and decision should contribute to and enhance the natural and local environment including by inter alia,

protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan.

- 5.48. Paragraph 180 sets out the approach to avoiding significant harm to biodiversity when determining planning applications.
- 5.49. The supporting technical work confirms that the Application Site is not a valued landscape, and the Scheme results in an overall net gain in biodiversity.

#### **National Planning Practice Guidance (March 2014) (as amended)**

- 5.50. The Planning Practice Guidance (“PPG”) supplements the content of the NPPF, including in relation to technical considerations.
- 5.51. The Scheme is submitted in accordance with the applicable PPG considerations, including in relation to inter alia, air quality, design, highways, noise, planning obligations and meeting local housing need.

#### **DCLG Announcements**

- 5.52. The NPPF should also be read in the context of a number of DCLG and Ministerial Statements which have emphasised the importance on the timely delivery of housing development. These announcements include: ‘Laying the Foundations: A Housing Strategy for England’ (Nov 2011); the Ministerial Statement ‘Planning for Growth’ (March 2011); and the Ministerial Statement ‘Housing and Growth’ (6 September 2012) with the latter confirming that the need for new homes is ‘acute’, that supply remains constrained and that a proactive approach was required to support growth.
- 5.53. Government announcements have repeatedly confirmed the need to increase the supply of housing.
- 5.54. As far back as 2013 the Government referred to the existence of a nationally identified housing crisis<sup>1</sup>. This further supports the need to significantly increase the supply of housing.

---

<sup>1</sup> In the House of Commons Debate on 24 October 2013, the Planning Minister, Nick Boles, reaffirmed that there is a national housing crisis.

5.55. The message relating to the need to boost the supply of housing and the associated economic benefits that arise have been carried forward in the more recent Statement produced in July 2015 by HM Treasury “Fixing the Foundations: Creating a More Prosperous Nation.”

5.56. Paragraph 9.1 states in relation to house building as follows:

**“The UK has been incapable of building enough homes to keep up with growing demand. This harms productivity and restricts labour market flexibility, and it frustrates the ambitions of thousands of people who would like to own their own home.”**

5.57. Paragraph 9.7 adds in relation to the planning system and the need for increased house building:

**“There remains more to do. As the London School of Economics (LSE) Growth Commission found, ‘under-supply of housing, especially in high-growth areas of the country has pushed up house prices. The UK has been incapable of building enough homes to keep up with growing demand<sup>2</sup>.’**

5.58. The announcements explain the importance of the need to *boost significantly* the supply of housing land which matter is a material consideration in relation to the assessment of housing supply.

5.59. More recently, the House of Commons Committee of Public Accounts (19<sup>th</sup> June 2019) (paragraph 1 of summary) concluded:

“The Department has a highly ambitious target to deliver 300,000 new homes per year by the mid-2020s but does not have detailed projections or plans on how it will achieve this. Meeting the target of 300,000 new homes a year will need **a significant step-up in the level of house building**. Current levels are not promising: the number of new homes has increased every year since 2012–13, with 222,000 new homes in 2017–18, but the average number in the period 2005–06 to 2017–18 was still only 177,000 a year. The Department accepts that it will need to transform the housing market to get more new homes built and says that achieving the target would be “very challenging”. Despite having introduced some projects to help, including encouraging small builders through the small builders guarantee scheme and reforming the planning system, the Department simply does not have the mechanisms in place to achieve the 300,000 target. This is compounded by lack of

---

<sup>2</sup> Investing for Prosperity, London School of Economics Growth Commission, September 2013

detailed rationale as to why this target was chosen in the first place. It also lacks year-on-year projections on how it will ramp up house building, only illustrative projections which are not in the public domain. **To make this even more concerning, the target does not align with the Department's new method for calculating the need for new homes which shows that just 265,000 new homes a year are needed.**"

- 5.60. The Committee of Public Accounts also noted with respect of affordable housing (paragraph 5), that:

**"The Department acknowledges that it will need to sustain and increase the numbers of affordable housing built to help it achieve the target of 300,000 new homes but cannot say how many and what types of affordable homes are needed.** The Department has not detailed its expectations for numbers of these types of homes to be built as part of its 300,000 target for new homes. It is encouraging greater numbers of affordable homes to be built through the Affordable Homes Programme; and its reforms to the planning system aim to deliver more homes in areas of high unaffordability, such as London and the South East. At local level, local authorities detail the numbers of types of affordable housing needed in their local plans including social housing, affordable rent, built to rent, and that provided by Housing Associations. However, these planned numbers can be undermined as developers renegotiate section 106 agreements to provide less affordable housing than originally agreed with local authorities. The Department believes that its reforms to section 106 agreements would help the provision of affordable homes."

- 5.61. The announcements explain the importance of the need to support the *Government's objective of significantly boosting the supply of homes* (NPPF paragraph 60) which matter is a material consideration in relation to the assessment of housing supply. Within this boosting of the supply of housing is a clear recognition of the importance of providing affordable homes (NPPF paragraph 62) as this will help meet the needs of specific groups (paragraph 60).

#### **Housing White Paper (Aug 2020)**

- 5.62. The content of the White Paper is a further material consideration relevant to the assessment and determination of the proposal.
- 5.63. It expands upon certain of the above publications, highlighting the fact that the country does not have enough homes and that the housing market is broken.



The introduction identifies the cause as being very simple: the lack of supply. Accordingly, the proposals set out how the Government intends to boost housing supply.

- 5.64. These recent publications and announcements highlight the importance and therefore weight to be given to increasing the supply of housing land.

#### NPPF – Consultation Changes

- 5.65. Draft changes to the NPPF were published for consultation at the end of December 2022. However, and for the reasons set out in PINS NOTE 14/2022, the starting point for decision making remains extant policy. The suggested changes only carry limited if any weight.

- 5.66. There may be further updates that may need consideration during the determination of the application.

#### **Guildford Borough Council**

- 5.67. There are also a number of supplementary planning documents and development management advice notes which represent material considerations in the determination of the Application.

- 5.68. Those relevant to determining the Application comprise as follows:

- Strategic Development Framework SPD (July 2020)
- Residential Design Guide SPD (July 2004)
- Climate Change, Sustainable Design, Construction and Energy SPD (September 2020)
- Parking Standards for New Development SPD (March 2023)
- Thames Basin Heaths Special Protection Area Avoidance Strategy SPD (July 2017)
- Planning Contributions SPD (2017)
- Planning Contributions for Open Space and Special Protection Area

### Strategic Development Framework SPD

- 5.69. This document expands upon the adopted LPSS and provides a more detailed explanation of how the Council expects its strategic allocations for housing, of which the Policy A31 allocation is one, to be brought forward. It provides guidance on master planning and the planning and development of these strategic sites so that high quality development is secured. Regard has been had to this document throughout the evolution of the scheme design.
- 5.70. The Application Scheme responds to the requirements of this SPD through the careful attention to scheme design which has been evolved in collaboration with the Council's planning officers.
- 5.71. In this regard, the following salient points are set out:

— **Paragraph 7.6.3. Figures 51 and 52 highlight the key connections to and within the site for all modes of travel. The figures include current infrastructure as well as interventions it would be expected the developer would deliver or contribute to. The developer may also improve current infrastructure.**

—

- 5.72. Figure 51 identifies Harpers Lane as an off-site vehicular route.
- 5.62. Figure 51 also identifies on-site vehicular routes which includes the Ash Road Bridge. The applicant will make a significant contribution towards enabling the delivery of the Ash Road Bridge.

### Residential Design Guide SPD

- 5.63. This SPD characterises the settlements that make up Guildford Borough, detailing many architectural stylings and urban grains that can be found and make each place unique.
- 5.64. The SPD provides guidance on the many considerations that must be factored into any new residential development including, but not limited to:

- Density
- Housing tenure, type and size
- Amenity and Privacy
- Affordable and Special Needs Housing
- Designing out Crime
- Energy Conservation and Sustainability

5.65. Much like with the Strategic Development Framework SPD, the proposed development responds to the requirement of this SPD by virtue of its considered design.

#### Climate Change, Sustainable Design, Construction and Energy SPD

5.66. This SPD expands upon the sustainability and energy efficiency policies within the development plan. It details the energy and waste hierarchies and details what is expected of developers in order to meet policy requirements.

5.67. The supporting Energy Statement and Sustainability Statement detail how the requirements of this SPD have been incorporated into the Scheme's design, resulting in an energy-efficient, resilient and adaptable development.

#### Parking Standards for New Development SPD

5.68. This SPD sets out the parking provision requirement for dwellings and developments of a certain size. Compliance with the standards set out in the SPD are evidenced by the proposed site layout plan.

#### Thames Basin Heaths Special Protection Area Avoidance Strategy SPD

5.69. It is detailed throughout this statement that off-site SANG will be procured and an appropriate SAMM contribution will be secured via S106 legal agreement. As such, the proposal accords with the requirements of this SPD.

### Planning Contributions SPD

- 5.70. The Planning Contributions SPD confirms that Guildford Borough is not currently a CIL charging authority and that required infrastructure contributions will be secured via legal agreement.

### Planning Contributions for Open Space and Special Protection Area

- 5.71. This document sets out the latest tariffs that will be imposed to mitigate the impacts of development upon the SPA and to secure sufficient public open space.

### **Relevant Planning Decisions (and Case Law)**

#### **Previous Proposal for 24 Dwellings on the Site.**

- 5.72. Under LPA Reference 17/P/02616, outline planning permission was sought on the site for the erection of 24 new houses with associated parking and creation of new vehicular access. The LPA refused planning permission on 5 November 2018.
- 5.73. Subsequent to the LPA refusal, the scheme for 24 dwellings was considered at appeal. Reference is made to the following paragraphs of the Appeal Decision dated 20 August 2019.

**3 - Following the determination of the planning application and the consideration of this appeal, the Council have adopted the Guildford Borough Local Plan: Strategy and Sites 2019 (LPSS). Whilst the LPSS is now part of the development plan for the purposes of decision making, some policies of the 2003 Local Plan have been saved. The relevant policies of both documents are set out in the Council's statement on which the appellant has had opportunity to comment. I have referred to the development plan as it is at the time I make this decision.**

**4 - One of the reasons the Council refused planning permission was concerned with the loss of deciduous woodland that would, as a result, cause unacceptable damage to wildlife habitat and protected species. Following the submission of additional information in this respect the Council's evidence suggests they**

***no longer wish to defend the reason for refusal on the grounds that any direct effect can be suitably mitigated though the use of conditions. I have no compelling reason to disagree. I have proceeded on this basis.***

***5 - With the above in mind, there are three main issues in the determination of this appeal. These are the effect of the proposed development on a) the character and appearance of the area; b) the Thames Basin Heaths Special Protection Area (TBHSPA); and c) whether the proposed development would make adequate contributions towards infrastructure having regard to its impacts and the requirements of the development plan.***

***7 - The appeal site is part of a housing allocation in the recently adopted LPSS (Policy A31).***

***10 - the appeal site is part of a wider housing allocation and thus the principle of housing development in the general area is acceptable but this does not mean at the cost of the defining characteristics of this semi rural part of the settlement edge. New housing across the remainder of the allocation will, as the appellant has pointed out, change the character of the area to one more built up. However, and as I have said, the appeal site is where most of the eastern edge of the allocation abuts the edge of the settlement and Harpers Road, the remainder of the allocation would be set noticeably back and behind the lower density rural style housing development I have mentioned. The appeal site is therefore more sensitive in character and visual terms and whilst I do not object particularly to how the northern section of the appeal site has been treated, I feel that the southern section, for the above reasons, would be harmful to the character and appearance of the area.***

***14 - There appears to be two key parts to the contributions sought in respect of improvements to highways infrastructure and they are commuted sums. The first is a £25,000 contribution for what is described as a road safety improvement scheme in the vicinity of the site. Looking into the evidence in support of this, there appears to be an existing safety issue at the junction of Harpers Road and Ash Green Road. A safety scheme seems to have been designed and costed. There appears clear indication this is what this contribution would be directed at and given the proximity of the junction to the appeal site, it is likely that the additional traffic generated by it would use the junction. I am content therefore, taking the above into account, that this contribution is justified.***

***15 - The second part to the highways improvements relates to the provision of a new road bridge. Referred to in the evidence as the Ash Road Bridge, the project is a multi million pound highways improvement scheme intended to alleviate the additional traffic***

**load that will arise out of the Policy A31 housing allocation, reduce delays through the closure of a level crossing and reduce rat running along other local minor routes by keeping traffic on the A323. The justification for the need for the bridge was investigated during the examination for the LPSS. The Inspector found that the provision of the bridge was necessary for the allocation to proceed having regard to the evidence presented. Noting that the appeal site is part of the Policy A31 allocation and falls along one of the rat running routes referred to during the examination, I agree that it would be reasonable for the scheme to make some form of contribution towards the provision of the road bridge.**

**20 - The Council, in their reasons for the refusal of planning permission, refer to the wider and aforementioned housing allocation and how the appeal scheme would represent piecemeal development of the allocation and not permit clear linkages between it and the remainder of the allocated land south of Ash and Tongham. In so doing, the Council feel that the appeal scheme would not make the best use of the allocated land or comprise sufficiently comprehensive development.**

**21 - I disagree. The layout appears to show that footpath and possible cycle linkages to an adjacent site and onto the built up parts of the settlement would be possible and the nature of the roads within the site would be such that I can see further possibilities an adjacent site could be linked by them. I am also mindful of the fact that the appeal site is contextually small and contained when compared to other segments of the allocation which, it also has to be borne in mind, are as likely to come forward separately as they would together. With these factors in mind, it seems eminently possible to ensure that the appeal site would not be isolated from the rest of the allocation albeit equally, given its size and degree of containment, it does not strike me as wholly unacceptable if it were not should all other issues be found to be acceptable.**

**25 – I note the appeal site is in a good location with regards to the ready access future residents would have to a range of services on which they would rely for day to day living, there would be no harm to the living conditions of existing or future occupiers and appropriate drainage could be provided. Be this as it may, this would all represent a lack of harm which would be neutral in any balance. It could not be used to weigh against harm.**

- 5.74. The findings of the Inspector in paragraph 25 where the site is in a good location with regards to the ready access future residents would have to a range of services on which they rely for day to day living and there would be no harm to the living conditions of existing or future occupiers weighs in support of the current proposals.

5.75. The council (and for that matter, the highway authority), did not put forward a highway reason for refusal for the 24 dwelling scheme. The Inspector considered the site has a good location with regards to ready access. The Appeal Inspector did not consider there was a highway issue and was fully aware that the site is part of a housing allocation in the (then) recently adopted LPSS (A31).

### Decisions in Guildford Borough

5.76. There have been a number of decisions relating to proposals for housing within the wider A31 policy allocation.

5.77. The applications comprise as follows (with the decisions included):

- Land at May and Juniper Cottages (LPA Ref: 18/P/02308)
- Land at May and Juniper Cottages (LPA Ref: 21/P/01211)
- Land South of Guildford Road (LPA Ref: 16/P/01679)
- Land North of Grange Road (LPA Ref: 17/P/02158)
- Land South of Ash Lodge Drive (LPA Ref: 17/P/02592)
- Land at Orchard Farm (LPA Ref: 22/P/01083)

LPA Reference	Dwellings	Decision	Decision Date
22/P/01083	51	Granted	18/08/2023
18/P/02308	100	Granted	18/02/2020
16/P/01679	154	Granted	01/05/2019
17/P/02158	60	Granted	29/03/2019
17/P/02592	481	Granted	29/03/2019
Total	810		

Table 1: Dwellings Granted on A31 Policy Allocation

5.78. Common themes from the above decisions include as follows:

1. There were no statutory or technical consultee objections to these applications.
2. All were presented to committee with a recommendation for approval.

5.79. Overall, these surrounding planning decisions highlight that development is supported in the A31 allocation.



## Land at Orchard Farm

- 5.80. Under LPA reference 22/P/01083, an application for the Erection of 51 dwellings with associated open space, landscaping and parking was submitted in June 2022.
- 5.81. On 18/08/2023, the appeal against non-determination was allowed and planning permission granted for the erection of 51 dwellings with associated open space, landscaping and parking.
- 5.82. This Inspector's report reached a number of conclusions that are pertinent to this Scheme. Firstly, regarding highways impacts upon Harpers Road, the Inspector concluded at paragraph 28 of their report that:

**"The proposal would not lead to a material increase in traffic movement along Harpers Road, which would remain lightly trafficked...I note, moreover, that the Highway Authority does not maintain an objection to the proposal"**

- 5.83. This rationale behind this conclusion on traffic generation along Harpers Road was detailed in paragraph 19 of the appeal decision where the number of vehicular movements along Harpers Lane was deliberated:

**"housing is proposed on land at 22 Streamside for 22 dwellings with access from Harpers Road, and a parcel of land further south (known as Big Acre) is contained between the appeal site and Harpers Road. There is no certainty...housing will come forward and be permitted on the latter site...The LPA has calculated that, taking these sites into account, the number of vehicular movements on the northern part of Harpers Road would increase to 118-138 during the morning peak, with 100-110 during the afternoon peak. However, this calculation includes 30 dwellings at Big Acre, whereas that figure is the estimated capacity for that site and Streamside...I consider...the appellants ranges of 98-118 and 83-93 vehicles for the morning and afternoon peak periods more likely to occur.**

- 5.84. As is evidenced by the above extracts from the Inspector's report, the traffic generation from Streamside was factored into a future year cumulative assessment and that the inspector found the highways impact arising from Orchard Farm to be acceptable and certainly not severe.

5.85. The next point of note to be taken from the appeal decision is the inspector's comments regarding housing land supply at paragraph 41 of the decision which reads:

**"The LPA's most recent assessment of housing land supply gives a level of provision sufficient for 6.46 years...In any event the site forms part of an allocation for housing, although the proposal would contribute to boosting delivery".**

5.86. It is clear that the housing land supply position is not a reasonable argument to manifest in opposition to development on the A31 policy allocation.

5.87. The impacts upon the amenity of Oakside Cottage was also assessed. The Inspector, at paragraph 45 of the appeal decision determined that, as existing tree cover within the curtilage of Oakside Cottage would be retained, the proposal would not result in the loss of privacy to the occupiers of Oakside Cottage.

5.88. At paragraph 49 of this appeal decision, the Inspector assesses the proposed affordable housing provision secured by the scheme with regard to Policies H2 and H7 of the Local Plan and concludes:

**"provision broadly consistent with these policies would be secured by planning obligations, and the LPA is satisfied that the proposal would be policy compliant in this respect".**

5.89. The Inspector concluded in paragraph 50 that all planning obligations, including the aforementioned affordable housing provision, met the statutory tests in regulation 122 of the Community Infrastructure Levy Regulations.

5.90. The overall conclusion to the Inspector's assessment of the Orchard Farm scheme can be found in paragraph 59 and 60 of the appeal decision which read:

**"59. This is a proposal which would contribute to the delivery of housing in a strategic allocation of the Local Plan and support the provision of an important piece of highway infrastructure. It would provide an appropriate mix of housing, including affordable dwellings. These matters carry significant weight. The economic benefits arising from development on the site merit moderate weight, and I also attribute moderate weight to the net gain in biodiversity and the opportunity for existing residents to use pedestrian and**

**cycle links through the development to reach Ash. The public benefits clearly outweigh the minor harm to the significance of the listed buildings.**

**60. No other harm would arise from the proposal and there are no material considerations which support a decision being taken other than in accordance with the Development Plan considered as a whole”**

- 5.91. The findings by the inspector in the Orchard Farm appeal are a material consideration in the assessment of this Scheme. It stands to reason that, due to the many similarities between the scheme, that planning permission for the current 24 dwelling scheme should be granted.

### **Five Year Housing Land Supply**

- 5.92. The site’s status as an allocated site means that it is taken into consideration as part of the Council’s land supply for the delivery of housing. As stated in the Orchard Farm Appeal Decision dated 18 August 2023, (paragraph 41):

**“The LPA’s most recent assessment of housing land supply gives a level of provision sufficient for 6.46 years...In any event the site forms part of an allocation for housing, although the proposal would contribute to boosting delivery”.**

### **Affordable Housing**

- 5.93. The Application Scheme proposes the on-site provision of 9 affordable dwellings, which amounts to 40% of the total number of net additional dwellings to be provided, in compliance with Policy H2.
- 5.94. Paragraphs 20 and 62 of the NPPF sets a strong emphasis on the delivery of sustainable development including affordable homes, whilst paragraph 60 clearly sets out the Government’s aim to “boost significantly the supply of homes.
- 5.95. The need for affordable housing and their importance in achieving sustainable development is emphasised in many government publications, including House

of Commons Committee of Public Accounts – Planning and the Broken Housing Market (19th June 2019).

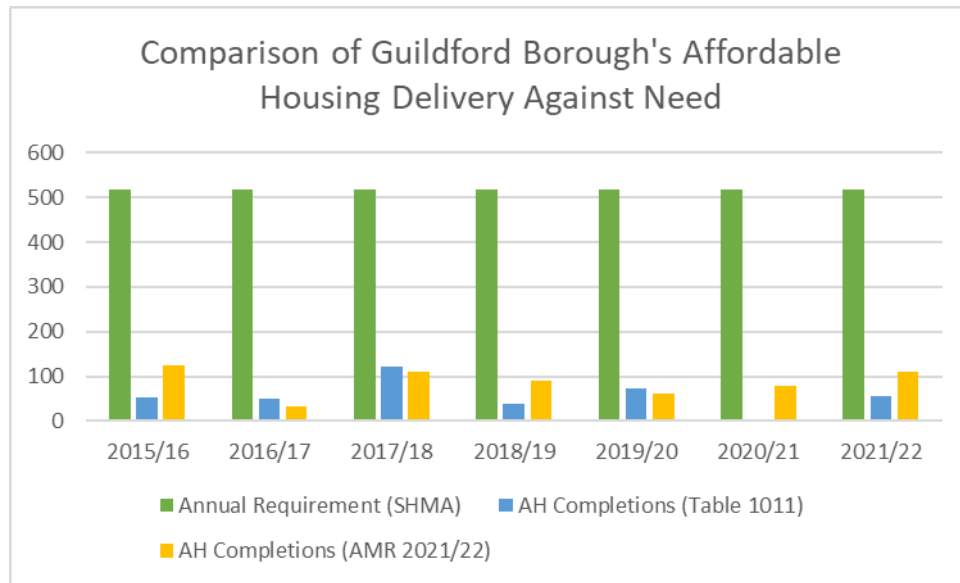
- 5.96. Paragraph 60 of the NPPF requires the needs of groups with specific housing requirements to be addressed. Paragraph 61 confirms that one of the specific groups relates to those requiring affordable housing.
- 5.97. The failure to meet the identified needs of affordable housing is a dire situation indicating that the Authority is not fulfilling the objectives in paragraph 60 of the NPPF.
- 5.98. The Council’s most recent Strategic Housing Market Assessment<sup>3</sup> (SHMA) identifies a current need for 517 affordable homes per annum in the Borough.
- 5.99. As indicated in Table 2 (sourced from the Government’s Affordable Housing Delivery Statistics<sup>4</sup> ), the Council have delivered 393 affordable homes in the period April 2015 to March 2022. This is equivalent to an average rate of 56.1 affordable dwellings per annum since 2015. This is compared with the lowest assessment of affordable need for the Borough as calculated in the SHMA.

Year	Annual Requirement (SHMA)	AH Completions (Table 1011)	Annual Shortfall/Surplus (Table 1011)	AH Completions (AMR 2021/22)	Annual Shortfall/Surplus (AMR 2021/22)
2015/16	517	53	-464	125	-392
2016/17	517	51	-466	32	-485
2017/18	517	121	-396	111	-406
2018/19	517	39	-478	89	-428
2019/20	517	74	-443	62	-455
2020/21	517			78	-439
2021/22	517	55	-462	110	-407
<b>Total</b>	<b>3619</b>	<b>393</b>	<b>-2709</b>	<b>607</b>	<b>-3012</b>

*Comparison of affordable housing delivery in Guildford Borough against the requirements detailed in the Council’s SHMA (2017)*

- 5.100. As the table above indicates, despite the disparity in the two sets of completion figures, there is a clear under-delivery of much needed affordable housing which is affecting Guildford Borough and how it functions in an economic, social and environmentally sustainable way.

5.101. The information in the table above is illustrated in the chart below.



5.102. On the basis of the available evidence, it is clear that there is a significant need for additional affordable homes and the delivery of affordable housing against the identified need has been woeful.

#### Future Affordable Housing Supply

5.103. The impacts that the Council's poor delivery of affordable housing has had upon those in need is further illustrated by the continuing significant need as indicated through a review of the Council's housing register as indicated in the table below.

#### *Extent of housing waiting list in Guildford Borough<sup>3</sup>*

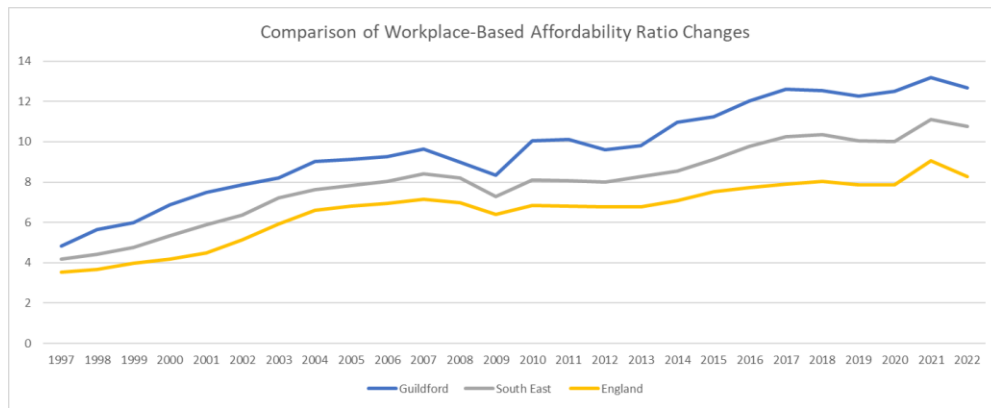
	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
Households on waiting list	2,249	2,157	2,197	2,194	1,913	1,979	1,859
Households in reasonable preference category	2,031	1,991	2,027	2079	1,842	1,908	1,802
Homeless	0	0	0	0	0	0	0

<sup>3</sup> Data from [Local authority housing data - GOV.UK \(www.gov.uk\)](https://www.gov.uk/local-authority-housing-data).

- 5.104. As noted, above the figures from April 2022 indicate that there were 1,859 households on the Council's Register, this situation has subsequently deteriorated with 1910 people on the joint housing needs register as of 31 March 2023. It is clear that the demand has not reduced as delivery has been insufficient to address needs. The average waiting time for an affordable house is more than 6 years.
- 5.105. Paragraph 60 of the NPPF requires that needs of groups with specific housing requirements to be addressed. Paragraph 61 confirms that one of the specific groups relates to those requiring affordable housing.
- 5.106. The future delivery of affordable housing in Guildford Borough is highly uncertain. Whilst the Council have taken steps to increase supply by way of large housing land allocations as part of the Strategy & Sites Local Plan, there is an over-reliance on larger applications to bring forward new stock which often take a considerable amount of time to build and are more susceptible to delays. This has the potential to make the situation even more severe not just for Guildford Borough's vulnerable position on affordable housing land supply, but for the significant number of households currently on the Council's Housing Register<sup>4</sup>. As indicated in the table above, the Government's figures indicate that in 2022 there were 1,859 households on the Council's Register. The Council's own published data, suggests that on 31 March 2023, the number of people waiting for an affordable dwelling to live in, is 1,910.
- 5.107. The acute affordable housing need reinforces the merits of the Scheme with the on-site provision of 9 affordable dwellings, securing desperately needed affordable housing.
- 5.108. The failure to meet the identified needs of affordable housing is a dire situation indicating that the Authority is not fulfilling the objectives in paragraph 60 of the NPPF. The under delivery of market housing has contributed to the worsening of the affordability ratios in the Borough as indicated in the chart below.

---

<sup>4</sup> [Local authority housing statistics data returns for 2019 to 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/local-authority-housing-statistics-data-returns-for-2019-to-2020).



**Affordability ratios in Guildford Borough**

- 5.109. The chart also shows that median workplace-based affordability ratios in Guildford Borough District more than doubled between 1999 and 2022 from 5.99 to 12.67 and have consistently been higher than regional and national ratios. This more than doubling in the affordability ratio has occurred because of a failure to deliver sufficient homes to meet market and affordable need in the Borough.
- 5.110. The under supply of housing impacts people and communities and is a contributory factor in the unaffordability of housing. The introduction of the affordability ratio to calculate housing need is intended to help with the significant affordability issues across much of the country. The formula applies an increase where the affordability ratio is above 4, or put another way, where the cost of purchasing a home exceeds 4 times annual earnings. A ratio of 4 is therefore deemed to be the level above which unaffordability occurs.
- 5.111. Within the Foreword of the 'Fixing our Broken Housing Market' White Paper (Feb 2017), the former Prime Minister made reference to the national average house prices being eight times that of average incomes, representing the highest ever affordability ratio. This reflects people on average incomes seeking an average priced property. The forward added that the broken housing market is one of the greatest barriers to progress in Britain today. It also states that whether buying or renting, the fact is that housing is increasingly unaffordable – particularly for ordinary working-class people who are struggling to get by.

5.112. A step change in the delivery of affordable housing is therefore required if the Council is to get anywhere near the local housing need figure and begin to address the imbalance in the local housing market between housing need and supply, including in relation to affordable housing delivery. Such a step change would be consistent with the thrust of paragraph 60 of the NPPF, to boost significantly the supply of homes.



## **6. Assessing the Acceptability of the Scheme**

6.1. This section assesses the acceptability of the Scheme in the context of 38(6) as well as relevant material considerations.

6.2. We have carried out this assessment using a series of main issues. We then draw our findings together in order to undertake the planning balance.

6.3. Our assessment and planning balance has been informed by the case put forward in the supporting Transport Statement.

6.4. The main issues to be considered are set in the paradigm that this site is allocated for residential development in the adopted local plan. Whilst previous schemes have not been supported by the Council, this application scheme has evolved through a positive collaborative process with the Council's planning officers that ensures:

- The Transport Statement (cognisant of the statutory highway authority position for 24 dwellings) demonstrates the traffic generation from the proposed development is acceptable.
- The scheme design complies with policies and guidelines to ensure the amenities of existing surrounding residents and the amenities of future residents are protected.
- The mechanisms under Section 106 of the Town and Country Planning Act to deliver the provision of on-site affordable housing.
- The mechanisms under Section 106 of the Town and Country Planning Act to deliver identified necessary mitigation measures in respect of:
  - i. A SAMM contribution**
  - ii. The provision of SANG**
  - iii. Contributions towards education projects (early years, primary and secondary)**
  - iv. Contributions towards open space provision in the area**
  - v. Contributions to highway safety improvements and pedestrian/cycle infrastructure improvements**
  - vi. A contribution towards the Ash Road Bridge scheme**

- vii. free and unfettered access to the estate roads, pathways, and cycleways; and**
- viii. securing mitigation measures to ensure no adverse impact upon the Thames Basin Heaths SPA**

6.5. The applicant is willing to enter into a legal agreement securing all appropriate developer contributions.

#### Highway Safety

6.6. The site has reasonable access to the local public transport network and there are a variety of local facilities within reach of the site. Ash Station is located approximately 400m to the west and provides links into Guildford, Farnham, Redhill, and Reading. Visibility from the site's two access points can be provided in both directions in line with the recommendations in Manual for Streets.

6.7. The proposals would likely only result in a moderate increase in traffic flows on the local highway with around 14 two-way movements during the morning and evening peak hours. The level of increase in vehicle movements is not considered to have any material impact on the safety or operation of the local highway network.

6.8. The proposals will generate a similar level of traffic the recently refused application on the site, which Surrey County Council raised no objection to on highways grounds. On the basis of the above it is concluded that the proposals accord with national and local transport related policies. The development will not have a detrimental impact on the surrounding highway networks, and we see no reason to refuse the application on traffic or transportation grounds.

#### Loss of Amenity to Oakside Cottage

6.9. To alleviate concerns regarding the potential impacts upon the amenity of Oakside Cottage, the Applicant has engaged in pre-application discussions with Council Officers to amend the design of the proposed scheme.

6.10. First, it is pertinent to recall comments made by officers when assessing the previous scheme's impact upon neighbouring amenity. In Paragraph 7.5.4 of their report to committee, the case officer stated that:

**“Oakside Cottage is separated from the applicant site by mature treed hedgerows, trees, and a domestic garden. Due to the considerable mature landscape enclosure, and retention and enhancement of this screen planting, impact from the application on this dwelling in terms of a) - c) above will be very limited.”**

6.11. The case officer then concluded, at paragraph 7.5.5 of their report that:

**“It is considered that the application will have no to very limited impact in terms of a) Privacy and overlooking; b) Visual dominance and overbearing effects of a development; and, c) Access to sunlight and daylight, as so assessed. In terms of issues d) – f), the layout has been assessed as acceptable,**

6.12. Whilst there was Officer support for the previous scheme layout and its impacts upon neighbouring amenity, amendments to the design of the southern parcel of the site have been made. The extracts below provide a comparison between what was previously proposed and that proposed here.

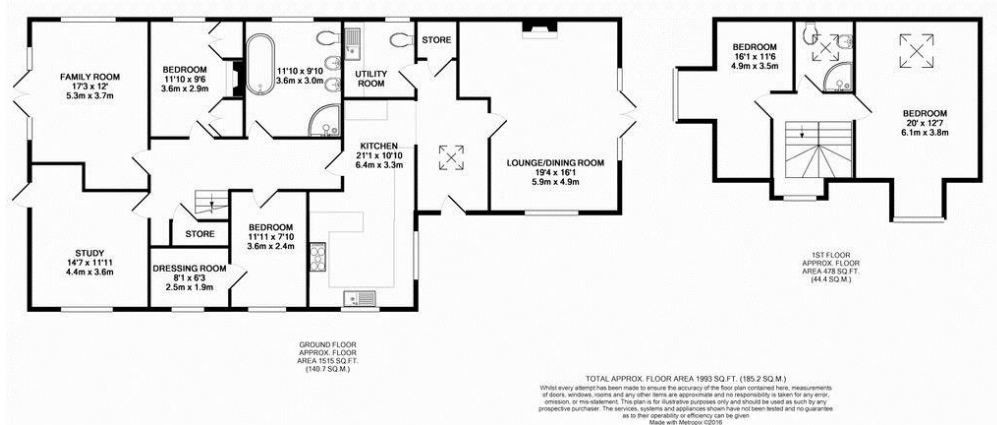


Previously Proposed Layout



**Currently Proposed Layout**

- 6.13. As can be seen on the extracts above, the scale and massing of plots 1 & 2 to the north of Oakside Cottage have been reduced. Both of these plots have also been reconfigured so that the proposed dwellings are less apparent in the views to the north achievable from within the garden of Oakside Cottage.
- 6.14. The landscaped buffer between Oakside Cottage and plot 14 has been enhanced to further mitigate to further reduce intervisibility. As referenced already in this Planning Statement, such a measure is recommended in the Council's Residential Design SPD.
- 6.15. The below extract of Oakside Cottage's floorplan shows that along its western elevation, which will face the proposed development, there are only four windows at ground floor level. It is against these that the 45-degree rule must be applied to determine any adverse effects by way of loss of light.



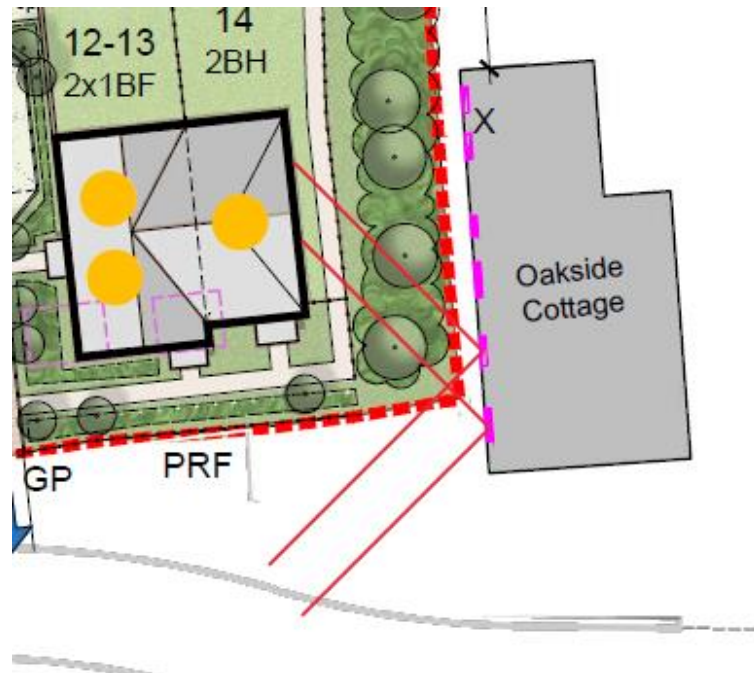
Oakside Cottage Floorplan (source: Zoopla)

- 6.16. The Council's Residential Design Guide SPD does not offer a definition of what constitutes a habitable room or an explanation of how the Council applies the 45-degree rule. As such, the principles from the Council's Residential Extensions and Alterations SPD have been utilised.
- 6.17. The Extensions and Alterations SPD defines habitable rooms as *"the main living areas in a home including bedrooms and sitting rooms."* On this basis, the windows serving the bathroom and utility rooms can be discounted from this part of the amenity assessment. The extract below defines how the 45-degree rule should be applied.



- 6.18. It must be noted that the Council's SPDs offer no guidance on the minimum distance the 45-degree rule must be unobstructed in order to be considered acceptable, so a level of professional judgement is required. Otherwise, as the

guidance is written, these lines could carry on in perpetuity which is neither feasible nor reasonable.



Annotated extract of site location plan showing 45-degree lines

- 6.19. The proposed site plan has been annotated to show 45-degree lines drawn from the centre of the identified habitable rooms on Oakside Cottage (see extract above). The 45-degree lines meet the side elevation of plot 14 at a distance of 12 metres, an entirely acceptable relationship between properties. This is not before boundary planting intervenes. However, the photograph below shows that this is the existing situation at Oakside Cottage. The lines expanding to the south of these windows show unobstructed access of daylight. As such, the proposed development can be considered to not exacerbate this existing situation.



**Image showing significant western boundary planting at Oakeside Cottage  
(source: Zoopla)**

6.20. The annotated extract (in 6.186) also shows two windows at the northernmost section of Oakeside Cottage's western elevation. Cross referenced with the floor plan of the property (see section 6.15 above); it is apparent these windows would appear to serve a living room. However, as evidenced by the photograph below, these windows are not in-situ on the dwelling. As the windows do not exist, no assessment is required.



Image showing living room of Oakside Cottage  
(source: Zoopla)

- 6.21. As detailed in this assessment, having regard to local planning policy and published design guidance, it is clear that the proposed development would have no adverse effects upon the amenity of Oakside Cottage by way of overlooking or overbearing impacts, loss of light or loss of privacy.
- 6.22. The proposal would not lead to a material increase in traffic movement along Harpers Road. The development will not have a detrimental impact on the surrounding highway networks. This ensures that development of much needed homes on an allocated site, when the waiting time for affordable house to be available for people in exceptional need to be housed, is more than 6 years.
- 6.23. This application scheme has no material harm either in terms of loss of privacy, overlooking or loss of light to existing neighbouring residential amenity.
- 6.24. As such, on these issues of highway safety and effect on neighbouring residential amenity, the development can be supported.

### Summary

- 6.25. The above considerations funnel towards four main issues for this scheme:

6.26. **Main Issue 1:** *Affordable housing need.*

**Main issue 2:** *Assessment of the scheme in the context of the increase in traffic and whether this impacts upon the safety of pedestrians on the shared pedestrian/vehicle use of Harpers Road.*

**Main Issue 3:** *Securing the necessary contributions towards local infrastructure.*

**Main Issue 4:** *Benefits of the scheme, development plan compliance and overall planning balance*

### Main Issue 1: Housing and affordable housing need

- 6.27. Our analysis in section 5 confirms the acute need for affordable homes. Furthermore, as the site is an allocated site in the Development Plan it follows that planning permission should be granted in accordance with the provisions



of Paragraph 11 of the NPPF.

- 6.28. Including for the reasons set out in Main Issue 4 below, we place very substantial weight upon the provision of housing and affordable homes.

**Main Issue 2: Assessment of the scheme in the context of the increase in traffic and whether this impacts upon the safety of pedestrians on the shared pedestrian/vehicle use of Harpers Road.**

*The Transport Statement summarises and concludes:*

*The proposed development is for the demolition of the existing dwelling and the erection of 24 dwellings in the land adjacent to Harpers Road, specifically for 22 houses and 2 x 1 bed flats. The adjacent Orchard Farm development will provide safe and well-maintained footways and cycle paths that will increase the permeability of this application site and allow easier access to Guildford Road and the facilities beyond, including the railway station. This will ensure that pedestrians and cyclists do not need to use Harpers Road as a means of access.*

*Site layouts for the development have been prepared to show how the 24 dwellings and parking required to meet current policy can be accommodated. Secure cycle storage or garages/car barns will also be provided for each property in compliance with local policy.*

*The site has reasonable access to the local public transport network and there are a variety of local facilities within reach of the site. Ash Station is located approximately 400m to the west and provides links into Guildford, Farnham, Redhill, and Reading. Visibility from the site's two access points can be provided in both directions in line with the recommendations in Manual for Streets.*

*The TRICS database was interrogated to establish the existing and proposed trips for the site. Census data was assessed to understand car usage and ownership in the area and then the modal split was applied to the trip data to understand the level of traffic the development might generate. The proposals would likely only result in a moderate increase in traffic flows on the local highway with around 14 two-way movements during the morning and evening peak hours. The level of increase in vehicle movements is not considered to have any material impact on the safety or operation of the local highway network.*

*The proposals will generate a similar level of traffic the recently refused application on the site, which Surrey County Council raised no objection to on highways grounds. On the basis of the above it is concluded that the proposals accord with national and local transport related policies. The development will not have a detrimental impact on the surrounding highway networks, and there is no reason to refuse the application on traffic or transportation grounds.*

**Main Issue 3: Securing the necessary contributions towards local infrastructure.**

- 6.29. Matters of detail, including in relation to the likely financial contributions will be secured in the form of a planning obligation(s).
- 6.30. Subject to meeting the necessary tests at paragraph 57 of the NPPF, it is considered that the following may be provided for in a legal agreement (consistent with the approach contained in section 7.15 of the Officer's report or 22/P/00977 in June 2023:
- Financial contributions to provide for satisfactory mitigation of the effects that the increase in residential units on the site would cause through increased recreational disturbance on the Thames Basin Heaths Special Protection Area;
  - Financial contributions towards highway improvements to the highway network resulting from impacts of the development;
  - Provision of additional SANG capacity (0.4ha)
  - Pedestrian and cycle access to adjoining land;
  - Developer contributions towards the provision of primary and secondary school education;
  - The delivery of 8 of the permitted dwellings as a mixture of on-site affordable housing.
- 6.31. Accordingly, as a satisfactory legal agreement will be completed securing the necessary contributions for on and off site provision of facilities and infrastructure, this addresses the requirements at policies P5, H2, ID1, ID3 and A31 of the Guildford Borough Local Plan: Strategy and Sites and saved Policy NRM6 of the South-East Plan (2009).

**Main Issue 4: Benefits of the scheme, development plan compliance and overall planning balance**

General

- 6.32. The Site is allocated for residential development in the Guildford Borough Local Plan: Strategy and Sites under Policy A31.

- 6.33. The Scheme has evolved through a collaborative process with Council Officers and no technical consultees raised an objection to the scheme.
- 6.34. The Council has approved numerous planning applications on land forming the wider A31 Policy allocation to help meet identified housing needs across the plan period.
- 6.35. There are no conflicts with the development plan when taken as a whole. The case for this is comprehensively addressed in this Statement and supporting technical reports. .
- 6.36. On the basis of the foregoing, whilst under the application of 38(6), there is no conflict with the development plan.

#### The Planning Balance: Assessing Sustainability

- 6.37. This section assesses the significant merits of the scheme in relation to the three sustainability tests set out at paragraph 8 of the NPPF and clearly shows that whilst there are considered to be some slight adverse impacts, these considerations are plainly incapable of outweighing, let alone significantly and demonstrably outweighing, the many benefits of the scheme.
- 6.38. Paragraph 9 of the NPPF states (amongst other things) the assessment of the sustainability roles should not be undertaken in isolation, because they are mutually dependent.
- 6.39. A planning balance exercise has been carried out in accordance with the guidance at paragraph 9 of the NPPF and sets out a combined analysis in relation to the sustainability roles (economic, social and environmental).

#### Economic

- 6.40. The scheme satisfies the economic role of sustainability including through the provision of housing to support growth and the associated provision of infrastructure, to be secured through preparation of the S106 agreement and by on-site provision of affordable housing.

- 6.41. The Scheme generates a series of local and Borough-wide economic benefits including through (i) construction of the scheme and the range of employment generated as a result; and (ii) the on-going expenditure from the households purchasing and occupying the new homes.
- 6.42. The principal economic benefits arising from the scheme are summarised below:
- (i) Increased house building in an area where there is a demand for new housing that in turn drives economic growth further and faster than any industry. In this regard the proposals will contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is being made available in the right place and at the right time to support growth.
  - (ii) The provision of up to 24 new homes in the Borough where there is an identified need.
  - (iii) The application scheme will deliver much needed affordable homes that will meet the acute need for affordable housing within the Borough (section 5 above).
  - (iv) Meeting general housing needs is a significant benefit, consistent with the Government's objective of significantly boosting the supply of housing.
  - (v) In order for the economy to function, sufficient housing is required in the right locations and at the right time. This site represents a location where there would be no significant impact upon the landscape nor on the amenity of neighbouring properties.
  - (vi) Based upon a multiplier of 2.3 jobs per new home<sup>5</sup>, the 24 dwelling Application Scheme is estimated to create approximately 55 new jobs.
  - (vii) Increased expenditure in the local area will support local FTE jobs.
  - (viii) Helping to deliver a significant boost to the local economy through 'first occupation' expenditure of £140,000<sup>6</sup>. This is expenditure on new furniture and other household goods that residents spend as one offs when moving into a new home.
  - (ix) Generating a further significant economic boost of £66,537 from residents moving into the Borough's existing housing stock which were vacated so that the owners could move into the new homes proposed on land at

---

<sup>5</sup> See page 13 of the Homes Builders Federation "Economic Footprint of UK Housebuilding " (July 2018) - [https://www.hbf.co.uk/documents/7876/The\\_Economic\\_Footprint\\_of\\_UK\\_House\\_Building\\_July\\_2018\\_LR.pdf](https://www.hbf.co.uk/documents/7876/The_Economic_Footprint_of_UK_House_Building_July_2018_LR.pdf)

<sup>6</sup> Research carried out by OnePoll on behalf of Barratt Homes (August 2014); <https://www.barratthomes.co.uk/the-buying-process/home-buying-advice/>).

Streamside, Ash. This is a result of the spending on renovations, household goods, removals, surveys, estate, and legal fees that are associated with the purchase of existing rather than new homes within the Borough's housing stock<sup>7</sup>.

- (x) In terms of household expenditure, data from ONS Family Expenditure Survey 2021-22<sup>8</sup> shows that the 'average UK household spend' is £528.80 per week (or £27,497.60 per year), whereas in South East England it is 18% higher than the UK average (Table A33). This means average weekly spend per household is £624.20 (or £32,458.40 per annum). For this scheme, the total gross expenditure is estimated to be £779,001.60 per year to the economy. A proportion of this household expenditure is anticipated to be spent in local shops and services and will help sustain the existing services in Ash and Tongham. The expenditure will include that a proportion of that spent on areas including food & non-alcoholic drinks (£71.60 per week); alcoholic drinks (£14 per week); recreation and culture (£73.90 per week), household goods and services (£41.20) and miscellaneous goods and service i.e. hairdressing & beauty treatments (£47.70 per week).<sup>9</sup> Given the current economic challenges facing the UK these are significant economic benefits.

- 6.43. By providing land of the right type, in the right place, and at the right time to support economic growth, the development of 24 no. dwellings on the site satisfies the objectives at paragraph 8 of the NPPF and assists in the aims of the NPPF in helping to build a strong and competitive economy.
- 6.44. This is further emphasised in the Government's November 2011 Paper 'Laying the Foundations: A Housing Strategy for England' where paragraph 11 states *"getting house building moving again is crucial for economic growth – housing has a direct impact on economic output, averaging 3 per cent of GDP in the last decade. For every new home built up to two new jobs are created for a year"*.
- 6.45. The economic benefits are to be accorded substantial weight in the planning balance.

---

<sup>7</sup> Research by HBF and Knight Frank on "Economic Benefits of housing market activity" which shows a contribution per house sale/purchase transaction of £9,560 - [https://content.knightfrank.com/research/2121/documents/en/knight-frankhbf-economic-benefits-of-housing-market-activity-2020-7616.pdf?pk\\_campaign=newsletter\\_4034](https://content.knightfrank.com/research/2121/documents/en/knight-frankhbf-economic-benefits-of-housing-market-activity-2020-7616.pdf?pk_campaign=newsletter_4034). The 2011 Census indicates that 34.8% of owner occupied or shared ownership households in Guildford Borough that had moved within previous year, had lived within the authority.

<sup>8</sup>[Family spending in the UK: April 2021 to March 2022](#)

<sup>9</sup> [Figures based upon SE Regional data in Table A33](#)

### Social

- 6.46. The Scheme satisfies the social role, in helping to support strong, vibrant and healthy communities, including through providing the supply of housing required to meet identified needs in open market and affordable sectors. This is a significant benefit. In addition;
- 1) Future residents will be in an easy walking and cycling distance to a wide range of other uses including the shops and services in Ash.
  - 2) The scheme will provide a range of housing types and size.
  - 3) The scheme secures high quality residential environment consistent with development plan policy.
  - 4) The scheme would deliver a policy compliant 9 affordable homes on site to help meet acute identified local needs.
- 6.47. Overall, the social benefits of the scheme can be afforded very substantial weight in the overall planning balance.

### Environmental

- 6.48. In terms of the environmental role, the site is not located on land designated for its landscape value. The reports submitted with the application demonstrate that the scheme will not have any significant impact on existing ecology.
- 6.49. The proposals provide an extensive woodland habitat and framework surrounding the development which will increase biodiversity, provided new native hedgerows on the site, and installing a range of ecological features including bat boxes. The proposal would therefore improve the ecological value of this part of the site and improve open space provision for the existing site and local community. A biodiversity net gain of 15.79% for habitat units and 139.00% hedgerow units can be provided on site.
- 6.50. The proposals would deliver sustainable homes allowing the fulfilment of this important objective.

- 6.51. On the basis of the above, there are environmental benefits which would arise from the proposals, to which, moderate positive weight should be attached to in the overall planning balance.

## **7. Summary and Conclusion**

- 7.1. This full planning application has been informed by a collaborative pre-application process undertaken with the LPA. The site is sustainably located on an allocated site, within walking distance from local services and facilities.
- 7.2. The proposal provides for a mix of housing types and tenures to cater for a wide range of local demand. This includes the provision of 9 much needed affordable homes in an area where housing is becoming increasingly unaffordable. Such provision attracts substantial weight.
- 7.3. As discussed above, the proposed development will secure a high-quality development that is respectful of its surroundings and will not give rise to any adverse effects upon neighbouring properties.
- 7.4. There are also the economic benefits, generated both during and post-development, which attract moderate weight as well as the environmental benefits generated through biodiversity enhancements which also attract moderate weight.
- 7.5. The supporting assessments evidence that there are no technical limitations to the site regarding highways, trees, flood risk, sustainability, and energy efficiency. In addition, the many benefits of the scheme clearly outweigh the limited heritage harm identified.
- 7.6. As detailed throughout this statement, the proposed development is fully compliant with the development plan (when taken as a whole) and therefore benefits from the presumption in favour of sustainable development as prescribed by paragraph 11(c) of the NPPF.
- 7.7. Overall, the Scheme secures a range of substantial benefits in a sustainable manner, upon an allocated site, which justify the granting of planning permission.