



PLANNING STATEMENT

**Innisfree Estate
Woodlands Drive
East Horsley
KT24 5AS**

February 2024

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1 INTRODUCTION

- 1.1 This Planning Statement is submitted in support of a planning application (“the Application”) for replacement of the existing 2 storey dwelling at the Innisfree Estate, Woodlands Drive, East Horsley KT24 5AS (“the Site”).
- 1.2 The current house was built in the mid-1960s in a chalet style that features a distinctive horseshoe footprint. This gives the building a very understated and plain front elevation that encircles the front courtyard parking area, but with a more open and visually interesting rear elevation that maximizes views south across the extensive Innisfree estate.
- 1.3 The current house, which is largely original save for a side extension granted in the early 1980s, suffers from a poor internal layout, with various level changes, low ceilings – all of which hinder accessibility. The old fabric of the building is hugely energy inefficient and is considered unviable to retrofit insulation, new windows or roofing – given the inbuilt dysfunctional layout and poor accessibility. Thus, the applicant has decided to consider the comprehensive redevelopment of the building to create an energy-efficient, carbon-neutral, light-filled home that maximizes the unique lakeside situation.
- 1.4 The design of the proposed replacement house has been carefully considered in relation to its relationship with the immediate and wider context – with diligence given to ensuring that the proposed building integrates with the expansive 57 hectare Innisfree estate.

SITE AND SURROUNDINGS

- 1.5 Innisfree is situated within the East Horsley Neighbourhood Area. **Figure 1** below provides aerial imagery of the immediate curtilage of Innisfree and **Figure 2**, the red line boundary of the entire Application Site. The extent of the 'red line' site area is 41,230m² or 4.1 hectares, with the full extent of the Innisfree Estate (i.e. the other land owned by the applicant and outlined with a blue line) is 571,434m² or 57.1 hectares. The Site has primary access from Woodlands Drive to the north but also benefits from two secondary points of access located (west) via Pine Walk/Lynx Hill and (south) via Dirtham Lane.



Figure 1 - Aerial Imagery showing Site Location (Pin Location is Innisfree)

1.8 These full extent of the application site can be seen in Figure 2 – the site plan - above.

1.9



Figure 3 - Existing Residential Dwelling at the Site – Front and Rear Elevations

PROPOSED DEVELOPMENT

- 1.10 The proposal comprises the demolition of the existing two-storey house and its replacement with a two-storey, 7-bedroom dwelling house.
- 1.11 The proposals also include the erection of a ground mounted PV arrays (located 150m east of the house) to provide renewable energy for the new house and help achieve a carbon neutral home.
- 1.12 The current horseshoe layout of the house has been adapted into a H-plan, based on two principal wings that are joined by the central link that serves as the main entrance to the house within a double-height atrium. Semi-internal courtyards front and rear provide a thresholds for entrance into the house and to the rear gardens and swimming pool.
- 1.13 Integrated within the central link will be a basement plant room and wine cellar.

Solar PV Arrays

- 1.14 The proposals include the erection of 104 solar PV panels (each measuring 2023mm x 1134mm). These panels will be ground mounted in two locations, approximately 150 metres east of the house, on the site of a disused tennis court (i.e. previously developed) and partially within an area of one of the paddocks.
- 1.15 The array to be located on the paddock will be visually screened by a perimeter hedge.
- 1.16 The array on the former tennis court is set within the fringes of the adjacent woodland (also owned by the applicant) which also provides a visual screen and backdrop.



View north east across the tennis court



View south from tennis court to paddocks

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Figure 4 - Photographs of the dilapidated tennis courts to be used for the PV arrays .

Photo shows the adjacent orchard

1.17 The panels will be attached to individual ‘spikes’ driven into the ground, which will allow the panels to be adjusted to a position 750-800mm high. This mounting system does not require a hard standing (concrete or gravel) base and has been selected to minimize the effect on the openness of the green belt.

1.18 Full details of the PV panels and the mounting system can be found on drawing ref: 1153-LA01-P1.



Figure 5- Proposed Site Plan (including PV array)

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Accommodation Schedule

- 1.19 Compared to the existing house, which has a footprint of **550m²**, an internal area of **743m²** (GIA) and a volume of **2,992m³**, the proposed dwelling house has a footprint of **565m²**, an internal area of **827m²** (GIA) and a volume of **3,868m³**.
- 1.20 Clear from the above figures, the proposed dwelling is evidently larger than the existing dwelling. In terms of percentages, this equates to an **11%** increase in above ground floor area (GIA) and a **29%** increase in above ground volume.

Job number	1153_Mathias House, Innisfree				
Site Address	Woodland Drive East Horsley, Inn Innisfree KT24 5AS				
Doc Ref:	1153_sA_300 - Area				
Revision:	I5				
Date:	19/01/2024				
Existing					
	GIA (m2)	GIA (ft2)	GEA (m2)	GEA (ft2)	Volume (m3) HdAr
Basement	19.50	209.92	39.46	424.75	
Ground	510.18	5,491.53	549.71	5,917.09	
First	232.91	2,506.99	253.82	2,732.06	
Total (Minus Basement)	743.08	7,998.52	803.53	8,649.15	2,992.00
Current Option 11/11/23					
	GIA (m2)	GIA (ft2)	GEA (m2)	GEA (ft2)	Volume (m3)
Basement	61.10	657.68	80.60	867.58	
Ground	460.80	4,960.05	521.00	5,608.04	
First	366.50	3,945.01	530.60	5,711.38	
Total (Minus Basement)	827.30	8,905.06	1,051.60	11,319.42	3,868.00
Total		9,562.74			
			% increase (Above ground GIA) =	11%	29%
			% increase (Above ground GEA) =	31%	

Figure 6 - Accommodation Schedule

- 1.21 Further details on the design strategy are set out in the Design and Access Statement submitted in support of the Planning Application.



Figure 7 - Proposed Dwelling House (rear elevation)

- 1.22 The proposed site layout can be seen in Figure 7. The replacement dwelling will be carefully sited on the existing dwelling footprint, albeit moved slightly farther forward (south) and to the side (east) to align more comfortably with the retained swimming pool.
- 1.23 No trees will be affected by the proposals – be it demolition or construction of the new house and solar PV array.



Figure 8 - Proposed Site Plan

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- 1.24 The Site is located within the Green Belt and outside of the settlement boundary of East Horsley. No other landscape designations apply to the site.
- 1.25 The nearest settlement is East Horsley, (which is approximately 0.5km west of the Site) and this settlement offers a range of services and facilities including school, rail and bus services, sports facilities and shops.
- 1.26 None of the buildings on the Site, or those immediately surrounding, are statutory listed.
- 1.27 The Site is within Flood Zone 1 (lowest risk of fluvial flooding). Pockets of the immediate curtilage of the site (in front of the house) are indicated on the EA LiDAR maps as being at higher risk of surface water flooding.

PLANNING HISTORY

- 1.28 The current lawful use of the site is residential. While the application site has some more recent (circa 2011) planning history relating to the equestrian buildings on the site, the house (Innisfree) itself has very limited planning history. The most relevant planning application was a domestic extension, which pertained to:
- A two-storey side extension to the house was granted in July 1983 (Reference 83/P/00672).

2 PLANNING POLICY CONTEXT AND MATERIAL CONSIDERATIONS

- 2.1 Section 70 of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 require that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

PLANNING POLICY CONTEXT

- 2.2 The relevant parts of the Development Plan, against which the Application is to be assessed, include:
- The National Planning Policy Framework (2023)
 - Guildford Local Plan: Strategy and Sites (2015-2034) (Adopted 2019);

- Guildford Borough Local Plan: Development Management Polices (adopted March 2023)
- East Horsley Neighbourhood Plan (Made in 2018).

2.3 The following policies (assessed further below) are of particular relevance to the Application:

National Planning Policy Framework (2023)

2. Achieving Sustainable Development

11. Making effective use of land

12. Achieving well-designed and beautiful places

13. Protecting Green Belt land

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

15. Conserving and enhancing the natural environment

16. Conserving and enhancing the historic environment

Guildford Borough Local Plan: Development Management Polices

Policy P6: Protecting Important Habitats and Species

Policy P7: Biodiversity in New Developments

Policy P11: Sustainable Surface Water Management

Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness

Policy D5: Protection of Amenity and Provision of Amenity Space

Policy D7: Public Realm

Policy D11: Noise Impacts

Policy D12: Light Impacts and Dark Skies

Policy D14: Sustainable and Low Impact Development

Policy D15: Climate Change Adaptation

Policy D16: Carbon Emissions from Buildings

Policy D17: Renewable and Low Carbon Energy Generation and Storage

Policy D23: Non-designated Heritage Assets

Policy ID10 Parking Standards

Guildford Local Plan: Strategy and Sites (2015-2034) adopted 2019

Policy S1: Presumption in favour of Sustainable Development

Policy S2: Spatial Development Strategy

Policy P2: Green Belt

Policy D2: Climate Change, Sustainable Design, Construction and Energy

East Horsley Neighbourhood Plan (2018)

Policy EH-S1: Spatial development in East Horsley

Policy EH-EN5: Flooding

Policy EH-H7: East Horsley Design Code

2.4 As indicated above, the Site is within the Green Belt.

MATERIAL CONSIDERATIONS

KEY ISSUES FOR DETERMINATION

Principle of Development in the Green Belt

- 2.8 The site is located within the Green Belt. Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open as the essential characteristics of Green Belts is their openness and their performance. Para 143 of the NPPF sets out the five Green Belt purposes.com
- 2.9 Policy P2 (Green Belt) of the Local Plan (2015-2034) (2) of this policy states that the ‘construction of new buildings in the Green Belt will constitute inappropriate development, unless that buildings fall within the list of exceptions identified by the NPPF. For the purpose of this policy, the following definitions will apply to those exceptions: Replacement buildings (b) A new building will only constitute a “replacement” if it is sited on or in a position that substantially overlaps that of the original building, unless it can be clearly demonstrated that an alternative position would not increase the overall impact on the openness of the Green Belt’.

The Proposed Replacement Dwelling

- 2.10 The proposed replacement dwelling would partially overlap the footprint of the existing house, being positioned a maximum of 7 metres south and a maximum of 4 metres east.
- 2.11 The repositioning was led by a desire to set the house a little further from the southern bank of Pennymead Lake and also to align the proposed H-plan layout and rear courtyard centrally with the retained swimming pool. This relocation would thereby reduce the potential visibility of the building in the surrounding landscape – particularly against the rear backdrop of Ridings Wood and Garden Grove [woods] to the north and east respectively. This minor relocation would not result in spatial harm to the openness of the Green Belt, while in visual terms it is arguable there might be a reduced impact.
- 2.12 The NPPF at paragraph 154 states that ‘*a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: (d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces’.*
- 2.13 This criterion of para 154 is most relevant as we are seeking permission for the replacement of one building. The proposed replacement building would be in the same use (residential C3) as its current use. Materially larger is not defined within the NPPF, nor within the Guildford Local Plan.

- 2.14 Figure 5 above, provides the area schedule figures (sqm/sqft) for the existing, and proposed dwelling (including or excluding the basement).
- 2.15 Based on the quoted areas/volumes (not including the basement), based on GIA existing/proposed and volume existing/proposed, there would be an 11% increase in floor area and a 29% increase in volume.
- 2.16 Guildford Borough Council do not quantify what is 'materially larger', from our experience of residential green belt development, a rule of thumb would be a range between a 30-40% increase being acceptable (of course subject to other relevant planning policies).
- 2.17 On the basis of a comparison of floorspace, improvement of visual impact by taking the built form marginally further away from the most prominent lake side the proposed development will have a neutral impact on the openness of the Green Belt. It does not, therefore, comprise "inappropriate development" in the Green Belt, and falls within the exception set out in Paragraph 154(d) of the NPPF. As such, the proposed development does not need to satisfy the 'very special circumstances' test of Paragraph 153 NPPF. The proposal also complies with Policy P2 of the Local Plan 2019, and will not compromise any of the aims of Green Belt policy, as set out above (and in Paragraph 143 NPPF).

The Solar PV array

- 2.18 Paragraph 156 of the NPPF states that in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases, developers/applicants will need to demonstrate 'very special circumstances' to support the proposals. The NPPF suggests that such benefits may include the wider environmental benefits associated with increased production of energy from renewable sources.
- 2.19 Paragraph 163 of the NPPF states that when determining planning application for renewable and low carbon development, LPAs should not require applicant to demonstrate the overall need for renewable or low carbon energy and recognize the value of small-scale projects that provide a valuable contribution to significant cutting of green house gas emissions.
- 2.20 Paragraph 164 of the NPPF states that in determining planning application, LPAs should give significant weight to the need to support energy efficient and low carbon heating improvements to existing buildings, including the installation of solar PVs here PD rights cannot be utilized.
- 2.21 Therefore, with consideration of paragraph 156 of the NPPF, if other considerations are

considered to outweigh any identified harm, including harm to the Green Belt, then very special circumstances will exist, and renewable energy developments can be permitted in the Green Belt. This is consistent with paragraph 163 which states that applications for renewable and low carbon [energy] should be approved if impacts are or can be made acceptable.

2.22 Local Plan policy D2 recognises that *“The Southeast of England is likely to face significant challenges from a changing climate and changing weather patterns”* and that *“A significant percentage of our carbon emissions come from our homes (32 per cent in our borough).”* Energy from renewable and low carbon sources is therefore encouraged.

2.23 The following *Very Special Circumstances* are material to the proposed PV array:

- The solar array is modest in scale given the context of the application site.
- It will provide energy solely for use by the occupiers of Innisfree.
- It would make a valuable contribution to cutting greenhouse gas emissions.
- Its positioning on previously development land and against the backdrop of a dense woodland help to minimise any visual impact and preserve openness.
- There is scope to provide new screening to mitigate visual harm to openness and enhance biodiversity [through the planting of native species hedges].
- The ground mounted solar array is freestanding and therefore easily removable from the site when [if] no longer required. As such, the works can be considered wholly and reversible, and the land is capable of being returned to its former state.

2.24 On balance, it is considered that the environmental benefits are sufficient to outweigh the limited harm to the openness of the Green Belt. Consequently, Very Special Circumstances exist and the scheme does not conflict with the relevant Green Belt policies of the NPPF.

Design

2.25 Policy D1 of the Local Plan 2019 seeks to promote high quality design, which is responsive to distinctive local character.

2.26 Policy D4 of the Local Plan: DM polices 2023 sets out how development proposals should achieve the ten characteristics of well-designed places, as set out within the National Design Guide.

- 2.27 A key component of the policy is paragraph 4, which states that the use of innovative design approach, including the use of material sand construction techniques will be supported where this presents an opportunity to create new or complementary identities that contribute to and enhance local character.
- 2.28 Policy EH-H7 of the East Horsley Design code [set out in the Neighbourhood Plan] sets out the requirements for the design of new houses and bungalows.
- 2.29 In response to this policy context, the design process started from an appraisal of the existing house, which concluded that it was nearing the end of its design life, lacking energy efficiency and failing to meet the requirements of the long term occupiers. While renovation and extension was considered, it was ruled out as being unviable practically (uneven floor heights, inferior materials) and financially.
- 2.30 Through a thorough site analysis and client discussions, the existing site's main advantages were selected and these included its seclusion, its open and unhindered views of the Surrey landscape to the south and west, and the presence and number of high quality mature tree specimens. The main disadvantages highlighted by the client were that the existing dwelling suffered very poor energy-efficiency, relative proximity to the lake [damp] and poor access to natural light.
- 2.31 The proposed design for the new house aims to relocate the dwelling away from the lake, creating an energy-efficient, carbon-neutral, light-filled home while preserving and enhancing the surrounding gardens openness of the grounds.
- 2.32 The proposed building maintains the current Innisfree's form, being divided into three elements, which is a design that echoes the existing structure, preserving its essence while incorporating new features.
- 2.33 The proposed building retains the scale, bulk and massing of the existing building, but reimages it within a H-plan layout that optimises the interior spaces within through thoughtful design. Balconies and double-height rooms enhance the client's enjoyment of the open landscape vistas south and across the Pennymead lake. Whilst mature trees, strategic positioning, and distances mitigate any potential overlooking issues, ensuring privacy for neighbours.
- 2.34 In term of height, the proposed design is dictated by the ridge height of the existing building, the neighbouring [albeit very distant] buildings and the surrounding trees.

- 2.35 The existing building is a two storey building, albeit with a partly inhabited roof space comprising three distinct elements. The central element features a higher ridge than the two flanking elements and incorporates three dormers.
- 2.36 The new building is arranged over ground and first floor, with the parapet of the central block and eaves of the two wings that are marginally higher than the ridge height of the existing house.
- 2.37 The proposed building features a duality within its fenestration, with a shielded entrance courtyard providing a sheltered introduction; visitors are guided into the central entrance, which opens to reveal the lightfilled spaces beyond.
- 2.38 The rear of the property features large areas of glass to make the most of the surrounding views and allow as much natural light as possible. Large expanses of openable glass create a seamless transition for the outside in.
- 2.39 The proposed building echoes the existing Innisfree house in massing and form while enhancing energy efficiency, client enjoyment, and site positioning.
- 2.40 Large areas to the rear of the property will enable the client to make the most of the surrounding views and allow as much natural light as possible, and creating a seamless transition from the outside in.
- 2.41 Contemporary construction methods will be utilised to reduce construction time and minimise disruption to neighbours.
- 2.42 The final design incorporates standing seam “Boat House Blue’ zinc cladding, showcasing a blend of tradition and modernity for a visually appealing and efficient structure.

Flood Risk and Drainage Strategy

- 2.43 Local Plan policy P11: Sustainable Surface Water Management states that development proposals are required to intercept as much rainwater and runoff as possible, including runoff from outside the site. The design proposals should maximize the use of permeable surface across the site.
- 2.44 Development proposals are required to follow the discharge hierarchy and prioritise the use of Natural Flood Management (NFM) and Sustainable Drainage Systems (SuDS) for all surface water that is not captured for later use.

2.45 When designing SuDS, development proposals are required to:

- a) follow the SuDS sustainability hierarchy;
- b) comply with the technical standards and design requirements set out in Defra's non-statutory technical standards for sustainable drainage systems;
- c) comply with guidance produced by the Lead Local Flood Authority;
- d) ensure that surface water runoff is managed as close to its source as possible;
- e) maximise biodiversity and amenity value, taking full advantage of opportunities for habitat creation and enhancement and improvements to water quality;
- f) incorporate a management treatment train to minimise risk of pollution to ground and surface waterbodies; and
- g) ensure that runoff from all hard surfaces receives an appropriate level of treatment.

2.46 The planning application submission is supported by a Drainage Strategy, prepared by Fairhurst, which evaluates surface water runoff, and the use of Sustainable Drainage Systems (SuDS) is assessed, and a suitable strategy set out to ensure no increase in flood risk offsite as a result of the development. Foul drainage is also assessed.

2.47 Surface water would be discharged in line with the drainage hierarchy set out in the PPG, which in this case would be to a surface water body – i.e. the Pennymead Lake, which is owned by the applicant and is located 20 west of the site for the new dwelling.

2.48 Foul water would be discharged via the existing private foul drainage to the 150mm public sewer north of the site within the Tennis Club.

2.49 In terms of SuDS, the proposals will make use of previous pavement materials, trees and soft landscaping and a bespoke attenuation storage tank.

2.50 In line with local planning policy, it is proposed to restrict runoff to the green field rate for all storms up to the design storm (1 in 100 plus climate change). The greenfield runoff rate has been calculated using the IH24 method and based on the proposed drained area of 0/1358ha to be 0.26 l/s as included in appendix D of the DS report. This value is low and poses a risk of blockage, so 2.0 l/s has been adopted.

- 2.51 Surface water runoff would be discharged to the Pennymead Lake via a new outfall.
- 2.52 In order to restrict surface water runoff to the rates set out above table a hydrobrake flow control chamber shall be installed upstream of the outfall to Pennymead Lake. Excess flow shall be contained within below ground attenuation tank and the tanked permeable paving. Causeway flow quick storage calculations have been undertaken which show that approximately 80m³ of storage would be required. Quick Storage calculations takes into account of a 40% increase in rainfall intensity to account for climate change.
- 2.53 The proposed drained area is 0.1358ha compared to 0.1365ha in the existing scenario. There would therefore be a reduction in runoff volume as a result of the development.
- 2.54 The proposed surface water drainage strategy is shown on Fairhurst Drawing ref: DRAINAGE STRATEGY. This drawing also includes indicative exceedance flow routes.
- 2.55 In addition to the proposed geocellular attenuation tank, permeable paving has been proposed (as set out in Table 4 of the DS). This would provide water quality and water quantity benefits.
- 2.56 In term of foul drainage, it is understood that foul flows from the existing house discharge to the Thames Water foul sewer to the west of the site. Proposed foul flows from the site would connect to the same sewer, utilizing the existing connection. To be confirmed by survey post planning.
- 2.57 In conclusion, it is proposed that surface water runoff would discharge to the Thames Water surface water sewer network at a proposed runoff rate of 2.0 l/s. In order to restrict runoff it is proposed that a bellow ground cellular attenuation tank would be provided, located in in the rear garden in a position clear of any tree root protection areas. This has been sized to accommodate the 1 in 100 year plus 40% climate change event with no flooding.
- 2.58 Appropriate treatment would be incorporated into the surface water drainage system to ensure that the quality of water discharged is acceptable. This would be achieved through the incorporation of a treatment train of SuDS including permeable paving. If required proprietary treatment systems would be incorporated, this would be confirmed at the detailed design stage. The proposed drainage network and SuDS would be privately managed and maintained for the lifetime of the development, ensuring that they remain fit for purpose and function appropriately. The management company/operator would be appointed post-planning. It is considered that the proposed development would be manage surface water runoff appropriately through the incorporation of SuDS. It is considered that the information

provided within this report satisfies the requirements of the NPPF, and local policy.

Lighting

- 2.59 Policy D12) of the Local Plan DM Polices requires that external lighting is designed to minimise glare and the spillage of light from the site and expects to see energy efficient lighting which reduces light scatter and complies with ILP guidance for lighting in rural areas.
- 2.60 No external lighting is proposed so there is no conflict with these policies.

Ecology and Biodiversity

- 2.61 Policy P6 (Protecting Important Habitats and Species) of the Development Management Policy Document looks to protect sites that contain or are adjacent to irreplaceable habitats, priority habitats and sites designated for their biodiversity value. Policy P7 (Biodiversity in New Developments) of the Development Management Policies seeks to ensure protected species are not harmed by new development. The policies also look to secure new native planting to enhance the biodiversity on sites.
- 2.62 A Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain Assessment (BNG) has been undertaken (prepared by JW Biodiversity Management) which identifies the immediate curtilage of the site as being mostly well manicured gardens, including a swimming pool, with numerous mature trees. A larger area of semi-improved grassland is located to the south, which has been left to grow for ecological purposes. Surrounding the site are large areas of woodland (north and northeast), with extensive paddock lands to the south and south east.
- 2.63 Notwithstanding the above description, the Site is of overall low ecological value, with the species recorded being common or abundant, with no evidence of any protected species recorded. There are no habitats of international, national, county or local importance that would be directly affected by the proposals.
- 2.64 The proposed demolition of the existing house and construction of a new replacement house on broadly the same footprint has warranted careful assessment of the existing house for evidence of protected species (primarily roosting bats) living within the house and immediate curtilage.

2.65 The recommendations of the PEA are set out below:

Recommendation	Action	Justification
Additional species surveys*	Surveys conducted in 2023. Not bat roosts detected.	
Retention and enhancement of habitats*	Retention and enhancement of majority of the habitats on site.	This will ensure that important habitat is protected.
Protection of breeding birds*	Carry out vegetation clearance (if required)/ building demolition outside of breeding bird season or under supervision of ecologist following a breeding bird survey	The buildings are likely providing several opportunities for breeding birds.
Appropriate lighting for bats*	Avoid illuminating bat foraging and commuting habitat- woodland/ scattered trees. During and post development.	This will help limit disturbance to bat species in the longer term.
Remove vegetation in stages*.	Cut down tall vegetation, if required, in stages to reduce risk of impacting protected/ notable species.	This will allow small mammals, reptiles or amphibians, if present to leave the area safely.
Join GCN district licence scheme*	Apply to NatureSpace to join district licence scheme.	This will ensure compliance with legislation and planning permission.
Follow badger protection measures*	Follow badger protection measures during construction.	This will stop badgers becoming potentially trapped.
Screen adjacent woodland with hording	Place hording along border with woodland habitats.	This will protect woodland from disturbance during construction.
Root and crown protection for trees. Soft fell trees	Ensure retained trees have adequate root and crown protection. Soft fell trees if required to be removed.	This will protect trees and protected species during development.
Adequate pollution control	Habitats on site should be adequately protected to ensure no polluted runoff in on site or adjacent land. All oils, fuels and chemicals should be adequately stored on site in bunded contains with appropriate spill kits and emergency procedures in place.	This will protect habitats on site and those in the nearby landscape.
Inclusion of bird and bat boxes in the development/ landscaping	Place boxes in suitable locations within the landscaping.	This would benefit local bird and bat populations on the site and within the local area.
Develop detailed planting plan.	Develop detailed planting plan as per BNG assessment.	This will provide a greater longer-term benefit for wildlife and ensure the project achieves the required net gain.

2.66 The key recommendation from the PEA are that with regard to Great Crested Newts (GCN), the applicant must apply to enter into a District Level License scheme (DLL) operated by NatureSpace to ensure that development is carefully undertaken to minimize impact on GCN.

2.67 Other measures include bat-friendly external lighting, the installation of bat and bird boxes within the fabric of the dwelling, tree protection measures during demolition and construction and careful clearance of vegetation.

Biodiversity Net Gain

2.68 A Biodiversity Net Gain assessment has been conducted by a competent ecologist and recommendations have been made to ensure the projects achieves a net gain

2.69 With reference to the compelled biodiversity metric (further details are in the appendix of the PEA) the proposed project will achieve a net gain of over 40% for habitat units. Hedgerow units will be increased by over 40%. This would meet the aim of achieving a 20% net gain.

2.70 The net gain is largely achieved by retaining and enhancing habitats on site, in particular

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grassland habitats. The hedgerow units show a significant increase due to the enhancement of existing tree lines on site. These habitats will help to provide an ecological benefit on site as well as providing additional bat foraging and commuting habitat.

- 2.71 This is in line with local and national planning policies. Recommendations have also been made in relation to protected and notable species.

Trees

- 2.72 The application site contains numerous mature trees, as detailed in the supplied Tree Survey and Constraints Plan prepared by AD Tree Consulting. However, none of the trees within the application site are covered by Tree Protection Orders. The site is also outside of any Conservation Areas that might afford supplemental tree protection.

- 2.73 Notwithstanding the above, the proposed development has been carefully considered to have no adverse impact on any of the existing trees within the site.

- 2.74 The supplied Arboricultural Impact Assessment has appraised the likelihood of impacts arising from demolition, groundworks and construction and concluded that the from an arboricultural perspective, the development is acceptable. This includes the proposed PV array, which will be sited on the dilapidated tennis courts that are already cleared of overhanging trees and branches.

Amenity

- 2.75 Policy D5 (Protection of Amenity and Provision of Amenity Space) of the Development Management Policies requires proposals to avoid having an unacceptable impact on the living environment of existing residential properties or resulting in unacceptable living conditions for new residential properties.

- 2.76 The proposed dwelling is set within a very substantial site (the immediate curtilage include house and garden is over 4 hectares). As such, there is sufficient distance between the proposed house and the nearest neighbouring houses (located north and south west) preventing there being an amenity impact from loss of privacy, overlooking etc. The new dwelling would not be overbearing of any sensitive neighbours by reason of this isolation within the wider Innisfree Estate.

- 2.77 The internal space of the house would meet and exceed the national space standards and there would be sufficient outside space for the residents of the replacement dwelling.

2.78 The proposal therefore would meet the requirements of the policy.

Heritage

2.79 The application site includes an existing dwelling, *Innisfree*. The building is not a designated heritage asset, and there are no statutorily listed buildings within the vicinity. The site is not within or directly adjacent to a conservation area. The house is not locally listed (GBC maintain a local list) but it is located within the *Historic Park and Garden* named *Horsley Towers*, a 'non-designated asset' identified by GBC. It is within an area of land that was once part of the Horsley Towers estate (Horsley Towers are now listed grade II*; List UID: 1294810).

2.80 In accordance with the requirements of Paragraph 200 of the National Planning Policy Framework (2023) a separate Heritage Impact Assessment has been prepared to describe the significance of the identified heritage assets (Horsley Towers Park and Howsley Towers themselves), followed by an appraisal of the effects of the proposals upon these heritage assets with consideration given to local and national policy and guidance.

2.81 Section 5 of Heritage Assessment presents an assessment of the impact of the proposed works on the significance of the identified heritage assets and concludes that the proposals would not harm the significance of either the non-designated park or the designated Horsley Towers. This is due to its negligible visual impact and the fact that it would not affect the appreciation of the listed building itself or any features that contribute to the significance of the former park.

2.82 In summary, the proposed works within the setting of the listed building is considered to be proportionate and compliant with relevant policies contained within Section 16 of the NPPF and relevant local planning policy and guidance. There would be preservation for the purpose of the decision maker's duty under section 66 of the Planning (Listed Building and Conservation Area) Act 1990.

2.83 The proposals would also be compliant with paragraph 209 of the NPPF and local planning policy.

Sustainability

2.84 The planning application is supported by a Energy and Sustainability Statement, prepared by Cudd Bently.

2.85 There is policy support for zero carbon development (Policy D2 Local Plan 2019), which

requires that new buildings 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). The current house was built in the 1960s and later extended, and it is expected that the replacement dwelling, being a new build subject to current Building Regulations, will achieve a significantly higher degree of energy efficiency than the existing dwelling, with the use of a high efficiency ground source heat pump to heat the new dwelling. The SAP Calculations predict an energy efficiency rating of 93 (Rating A) and an environmental impact (CO₂) rating of 100 (Rating A) which significantly improves upon the existing dwelling.

3 PLANNING BALANCE AND CONCLUSIONS

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. Policy S1 of the Local Plan 2019 (and Saved Policy G1 of the Local Plan 2003) provides that planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
- 3.2 The Proposed Development has been carefully considered against the relevant local contained in the Development Plan and also application national policy which is a material consideration.
- 3.3 The Site is located within the Green Belt, but the proposals are not “Inappropriate development” in the Green Belt, as it forms part of the exceptions set out in paragraph 154(d) & (g) of the NPPF – that is, the proposal involves the replacement of a building, providing the new building is in the same use and is not materially larger than the one it replaces; and that the redevelopment of previously developed land (PDL) [with more specific reference to the Solar PV array] would not have a greater impact on the openness of the Green Belt than the existing development.
- 3.4 The proposed solar PV array, while sited on PDL and benefiting from visual screening, is supported by Very Special Circumstances to justify the innate harm to openness of the greenbelt. These include the solar array is modest in scale given the context of the application site; will provide energy solely for use by the occupiers of Innisfree; will make a valuable contribution to cutting greenhouse gas emissions; is positioning on previously development land and against the backdrop of a dense woodland help to minimise any visual impact and preserve openness; there is scope to provide new screening to mitigate visual harm to openness and enhance biodiversity [through the planting of native species hedges]; and finally, the ground mounted solar array is freestanding and therefore easily removable from the site when [if] no longer required. As such, the works can be considered wholly and reversible, and the land is capable of being returned to its former state.
- 3.5 The Green Belt status of the site notwithstanding, the Site is located *outside* of the Surrey Hills AONB and AGLV. No major development is proposed; the proposal involves one replacement dwelling on the Site and has been designed to deliver visual improvement on the Site by removing built form further away from the western boundary [with the Pennymead Lake] and can make better use of the screening provided by retained trees and the backdrop of the woodland.

- 3.6 Whilst the Site is outside of any settlement boundary, and therefore in the countryside, there is no net increase in the number of dwellings proposed, simply offering a one-for-one replacement, which offers an improvement in design quality and substantial environmental performance.
- 3.7 The Ecological Appraisal submitted with the Application confirms that the Site is of overall low ecological value, with no evidence of protected species. There are no habitats of international, national, county or local importance that would be directly affected by the proposals.
- 3.8 The Application is therefore compliant with both the Development Plan and the NPPF. On this basis, it should therefore be approved.