



To: Planning & Regulatory Committee
By: Planning Development Manager
District(s) Guildford

Date: 23 April 2025

Electoral Division(s):

Worplesdon

Mr Witham

Case Officer:

Katie Rayner

Purpose: For Decision

Grid Ref: 495312 153161

Title: Minerals/Waste GU/24/CON/00011

Summary Report

Land at Merrist Wood Golf Club, Holly Lane, Worplesdon, Surrey, GU3 3PB.

The importation and deposit of inert materials and soils on 55 hectares of land to construct and remodel the existing golf course, with associated water features and the creation of heathland and wetland habitat.

The application site is situated to the north-west of Guildford Town Centre and is accessed off Holly Lane to the south-east which links onto the A323 (Aldershot Road). The application site forms part of an existing 18-hole Golf Course, covering an area of approximately 90 hectares(ha) in total.

The site lies within the Metropolitan Green Belt, where inappropriate development is by definition harmful to the Green Belt and should not be permitted except in very special circumstances. Whilst the site does not fall within any local level nature conservation, heritage or landscape designations, two Grade II Listed properties are located either side of the access to the application site and immediately to the north of the site is the Ash to Brookwood Heaths Site of Special Scientific Interest (SSSI). The Ash to Brookwood Heaths SSSI is also designated as part of the Thames Basin Heaths Special Protection Area (SPA) and the Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC), for its complex of wet and dry heathland and bog habitats. The Merrist Wood Site of Nature Conservation Importance (SNCI) also lies to the north and north-east of the site.

Planning permission is sought for the importation and deposit of some 369,038 cubic metres (m³) of inert waste material from Construction, Demolition and Excavation (C,D&E) sources, alongside 58,753m³ of site derived soils (cut and fill), to remodel approximately 55ha of the existing Golf Course at Merrist Wood, comprising holes 1 to 18.

To date, 109 letters of representation have been received in response to the proposal, comprising 107 objections and two letters of support. The concerns raised predominately relate to the number of HGV movements generated by the proposal, and flood risk following increased flooding experienced in the area. Concerns are also raised by Guildford Borough Council and Normandy Parish Council. In support, letters raise that the proposal will bring the opportunity for an improved facility, and that the traffic generated is considered insignificant to that already experienced in the area. Further Worplesdon Parish Council support the proposal, subject to several measures including a Section 106 agreement to secure funds to cover the completion of the development and a new pedestrian crossing.

The proposal is considered inappropriate development in the Green Belt. In this regard, it is necessary to consider whether very special circumstances exist which **clearly outweigh** the harm to the Green Belt and any other harm. Issues relating to heritage, landscape and visual amenity, noise, dust, flooding and traffic have also been carefully considered.

With regard to the management of waste within the County, the proposal would result in the diversion of a significant volume of C,D & E waste material from existing consented facilities in proximity to the site. It is also not adequately demonstrated that the proposal would not prejudice the availability of fill material in the county, and that there is a beneficial need for the proposal, that it could not be met in any other way and importantly that the minimum volume of material necessary to achieve the proposal is proposed.

The County Highway Authority has advised that the applicant has not provided sufficient information to adequately assess the implications of the development on the local highway network and appears to have miscalculated the number of vehicle trips likely to occur per hour. It is also not demonstrated how the junction at Holly Lane on to Coombe Lane will be safely managed.

The County Historic Buildings Officer has raised concern regarding the impact on the identified heritage assets from the industrial nature of the vehicles movements, detracting from their rural and country estate setting. Merrist Wood College have also raised concern regarding the impact of the proposal on the shared access and their users. Consequently, Officers are not satisfied that the proposed development would not have an unacceptable impact in respect of highway safety, traffic and access and on the historic environment contrary to the Development Plan policy.

Technical consultees including the Environment Agency, Lead Local Flood Authority, County Ecologist, and the County Geotechnical Consultant have also advised that the applicant has not provided sufficient information to enable a full assessment of the effects of the proposal, and where necessary, identify appropriate mitigation measures to minimise or avoid any material adverse impact with regard to flood risk and drainage, noise, air quality, ecology, landscape and visual amenity and contamination.

With regard to ecology and biodiversity, it is noted that all habitat and protected species survey work submitted in support of the application is now considered to be out of date and overall, there is insufficient detail to demonstrate the appropriate protection, mitigation and compensation measures for habitat and ecological receptors, including great crested newts and bats. **Such information is required prior to the determination of the application.**

The development is inappropriate and by definition harmful to the Green Belt and does not preserve the openness and would conflict with the purpose of protecting land within the Green Belt. Officers consider that it is not demonstrated that factors alone or in combination exist in this case, that amount to very special circumstances, which **clearly outweigh** the harm to the Green Belt, by reason of inappropriateness and loss of openness, and the other harms identified resulting from the proposal. As such the proposal does not comply with Development Plan policy in this regard.

Given the insufficient nature of the information submitted with the application, Officers cannot be certain that the proposed development would not have an unacceptable impact in relation to the highways, traffic and access, heritage, flood risk and drainage, landscape and visual amenity, air

quality, noise and ecology and biodiversity and the Green Belt, and that planning conditions could mitigate or otherwise overcome the relevant harms. As such Officers consider that the proposed development is unacceptable in the context of its location and does not accord with the Development Plan.

The recommendation is that the application should be REFUSED for the reasons set out at the end of this report.

Application details

Applicant

VV Contractors Ltd (formerly known as Lavershots Oaks Limited)

Date application valid

19 February 2024

Period for Determination

10 June 2024, extension of time agreed until 30 April 2025.

Summary of Planning Issues

This section identifies and summarises the main planning issues in the report. The full text should be considered before the meeting.

	Is this aspect of the proposal in accordance with the development plan?	Paragraphs in the report where this has been Discussed
Principle of the Development in the Green Belt	No	63-80
Waste Management	No	81-106
Highways, Traffic and Access	No	107-127
Impact on Heritage	No	128-147
Surface Water Drainage and Flood Risk	No	148-173
Landscape and Visual Impact	No	181-195
Noise	No	196-209
Air Quality and Dust	No	210-229
Ecology and Biodiversity	No	230-263
Contamination and Soils	No	264-274
Green Belt – Very Special Circumstances	No	275-289

Illustrative material

Site Plan

Plan 1

Aerial Photographs

Aerial 1 – Surrounding Area

Aerial 2 – Application Site

Appended Documents & Plans

Drawing No: 865.02 Rev E, Proposed Layout & Grading Plan, dated 01/02/24

Drawing No: 864.20 Rev A, Soil Footprint Plan, dated 30/08/23

Drawing No: 864.99, Contour Heat Map, dated 01/02/2024

Habitats Regulation Assessment Report dated 3 April 2025

Background

Site Description

1. The application site forms part of an existing 18-hole Golf Course, covering an area of approximately 90 hectares(ha) in total. This proposal relates to 55ha of the course, covering the area of play and associated water features and landscaping.
2. The application site is located just outside of the urban edge of Guildford, approximately 4 kilometres (km) to the north-west of Guildford town centre, in close proximity to the residential area of Fairlands. The village of Worplesdon is located approximately 1.25km to the north-east of the site. The site is accessed to the east via Coombe Lane, a private road, which also serves as the entrance to the Merrist Wood College Campus, Merrist Wood Equine Arena and the associated College facilities. Coombe Lane joins the public highway to the south at Holly Lane, and is also classified as a Public Right of Way (PRoW) (footpath 463). Holly Lane links to the A323 (Aldershot Road) to the south via a roundabout junction and the A322 to the north.
3. The Golf Course is accessed via a long tarmac access track measuring approximately 600m, extending from Coombe Lane and terminating at the Golf Course club house and car park, situated in the south-east corner of the site. Merrist Wood College Campus is located immediately to the east and north-east of the site and provides education in land-based sectors such as animal management, arboriculture, wildlife and conservation. The main College campus buildings are located approximately 240 metres (m) to the north-east of the site and the Equine Arena is located approximately 220m to the east. To the south of the application site, along Aldershot Road, there is a combination of residential, industrial, and commercial developments.
4. The nearest residential properties to the application site are located immediately to the south of the site, at Halifax Close, Pine Park Caravan Site and Fair Oaks Caravan Site and to the south-west at Cobbetts Hill Road comprising the Ash Bridge Caravan Site and Clasford Bridge Caravan Site at Cobbetts Hill Close. Two residential properties are also present either side of the shared access to the site off Holly Lane, 250m from the main site entrance to the Golf Course. These properties comprise two Grade II Listed Lodge Houses. An existing waste transfer and materials recovery facility, referred to as Sunnyside, also adjoins the site to the south-west off Aldershot Road and the Cobbett Hill Earth Station which comprises a number of industrial style businesses including the processing of waste, is located approximately 230m to the north-west of the site.
5. The northern boundary of the site is enclosed by woodland associated with Cobbett Hill Common. A PRoW (footpath 646), and the Fox Way circular route, also run parallel to the northern boundary of the site. Cobbett Hill Cottage, a residential property adjoins the application site to the north and is accessed via the public right of way along the northern boundary of the site from Cobbett Hill Road to the west. To the north-east of the site are

pockets of Ancient Woodland, including Merrist Wood, which is 0.4ha in size and is situated approximately 150m to the east of the application site boundary. The western and southern boundaries of the site are enclosed by Cobbett Road and the A323 Aldershot Road. Two areas of common land, Clasford Common and Littlefield Common, adjoin the edge of the site to the south.

6. The site is located within the Metropolitan Green Belt and immediately to the south of the Ash to Brookwood Heaths Site of Special Scientific Interest (SSSI). This SSSI is designated as part of the Thames Basin Heaths Special Protection Area (SPA), for the presence of breeding populations of the Dartford Warbler, the European Nightjar, and the Woodlark. The SSSI is also designated as part of the Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC), for its complex of wet and dry heathland and bog habitats. To the north and north-east of the proposed development site is the Merrist Wood Site of Nature Conservation Importance (SNCI).

Planning History

7. Planning permission (Ref.91/P/0546) for the development of the Golf Course was originally granted by Guildford Borough Council on 23 September 1991, for the development of two 18-hole Golf Courses and a Driving Range. In terms of the second 18-hole Golf Course and the driving range a Section 106 agreement was secured between Guildford Borough Council and Merrist Wood College dated 1 February 1996, to ensure that the second course was not built on the site. Details of the layout of the single 18-hole Golf Course and associated infrastructure were subsequently approved on 1 February 1996 under planning permission Ref.95/P/01564.

The proposal

8. The proposal comprises the importation and deposit of some 369,038 cubic metres (m³) of inert waste material, alongside 58,753m³ of site derived soils (cut and fill) to remodel approximately 55ha of the existing Golf Course at Merrist Wood, comprising holes 1 to 18. The development would amount to the construction of a new Golf Course facility and the works would comprise:
 - Repositioning, reprofiling and enlarging all 18 fairways and greens
 - Increasing the number, size and height of tees
 - Increasing the size of putting greens
 - Reprofiling the practice range outfield
 - Erecting bunding along the southern boundary
 - Constructing an above ground storage lagoon along part of the northern boundary
 - Constructing a new water body in the south-east of the site
 - Extending two existing water bodies in the central area of the site
 - Installation of a range of pumps, pipes and drains to facilitate rainwater harvesting and irrigation
 - Constructing mounding in various locations across the Golf Course and practice range outfield.
9. The design also includes heathland habitat, acid grassland and wildlife corridors between the fairways and around the course. The applicant has suggested that there is also potential for enhanced public access, including community groups and general public access, through the potential addition of new footpath routes.
10. In order to facilitate the proposal it is proposed to import inert waste material, sourced from Construction, Demolition and Excavation (C,D& E) waste sources. It is anticipated that site derived material would also be utilised, and sourced from the proposed lake on the proposed 18th hole, the extension of the pond on the proposed 9th hole and the

irrigation storage lagoon adjacent to the proposed 15th hole. The total gross fill proposed to be utilised is therefore anticipated to be 427,791m³.

- 7
11. There is also some discrepancy within the submitted documentation with regard to the anticipated timescale for the works. Whilst the Planning Statement states that the works could take up to two years, other application documentation refers to a three-year construction period. Importation is anticipated to take place up to 256 days a year and the works are proposed take place Monday- Saturday, with no working on Sundays, Bank or Public Holidays. The proposed works are anticipated to take place in five phases due to the scale of the project as shown on submitted Drawing No: 864.06, Phasing Plan, dated 08/09/2023.
 12. The applicant has stated that the proposal would generate 141 Heavy Goods Vehicle (HGV) movements each working day. These HGV movements would be in addition to other vehicle movements associated with the development such as those associated with site/construction contractors. The vehicle movements are proposed to be split 50/50, with 50% accessing the site from the north via Junction 3 of the M3 Motorway, and 50% accessing the site from the south travelling north on the A3.
 13. The applicant sets out within the submission that the purpose of the development is to rebrand the Golf Course/club to a high quality state of the art facility, whilst also addressing the deterioration of the course, which has a poor reputation and underlying design defects. The design defects as suggested by the applicant, include areas of the Golf Course (including the practice range outfield) being prone to excessive waterlogging and seasonal closure (affecting the viability of the facility) and public safety issues from vandalism and trespassing associated with the housing along the southern boundary of the site. In addition, it is proposed to install rainwater harvesting (from the practice range outfield) and lagoon storage to make the Golf Course self-sufficient in the supply of water for irrigation purposes.

Consultations and publicity

District Council

14. **Guildford Borough Council** - Concern regarding control over the development during two-year period given proximity to residential properties including mobile residences. Concerns also raised regarding stray golf balls, risk of land contamination, noise from vehicles, hours of working and air quality.
15. **Guildford Borough Environmental Health Officer** - No views received.

Consultees (Statutory and Non-Statutory)

16. **County Ecologist** - The survey data provided is outdated. Specifically, updates for UK habitat surveys, bat surveys, and badger surveys are required. There is insufficient information regarding protected species and habitat details, including locations of trees with bat roost potential, Great Crested Newt breeding ponds, and known badger setts. Several sections of the submitted technical notes are also incomplete, requiring clarification and updates, including the presentation of a plan showing protected species locations. For bat surveys, it's unclear whether trees to be felled, have roosting potential, further surveys are therefore required. Bat activity surveys also need to be updated to include spring surveys and follow established guidelines. The absence of invertebrate surveys, especially for terrestrial and aquatic species, needs justification. Impacts on aquatic invertebrates from pond changes also need assessment.

Invasive plant species such as New Zealand Pygmyweed, Rhododendron, and Himalayan Balsam are present on site, and their impacts and management to avoid

spread haven't been properly assessed within the submission. Although a biodiversity net gain of 5.49% has been demonstrated, gains for hedgerow and watercourse habitats were not included. Additional information is required to show how the development aligns with the Ash, Brookwood, and Whitmoor Heaths Biodiversity Opportunity Area objectives. Further details required on habitat creation, imported materials, and their suitability for proposed habitats are needed to ensure successful mitigation and enhancement.

17. **County Arboricultural Officer** - Further information required from the applicant prior to being able to provide a substantive response. The information provided is not consistent in terms of the number of trees likely to be removed as a result of the proposal.
18. **Active Travel England** - No views received.
19. **County Archaeological Officer** - No archaeological concerns regarding the current proposals for the site.
20. **County Highway Authority** - Further information is required to assess the impact of the proposal, on the site access junction with Holly Lane. The calculations within the submitted Transport Statement (TS) only represent one-way movements. The correct modelling including Passenger Car Units (PCU) needs to be undertaken. Additional modelling is also required to assess the impacts on the A323 roundabout junction with Holly Lane, as no certainty can be provided in terms of vehicle routing, this assessment should assume that 100 per cent of vehicles will route south via this junction in order that the assessment is suitably robust.

The vehicle tracking provided in the TS demonstrates that the existing access junction is of insufficient width for two large vehicles to pass. Coombe Lane does not form part of the public highway, it is a ProW (footpath 463) and the lack of suitable carriageway width to accommodate HGV movements and the high risk of multiple HGVs needing to pass each other presents a potentially severe risk to the safety of any pedestrians on the footway.

21. **County Enhancement Officer** - Objection, this development will divert material from the restoration of mineral sites contrary to Policy 5. Further evidence of the prolonged high water table and restrictive playing conditions is required. No assessment of the alternatives considered in developing the proposal to overcome the concerns raised. A Soil Resource and Management Plan would need to be secured by condition, detailing the existing soils on site, whether imported soils (i.e. for the final layer above any imported waste) are in fact needed together with relevant volumes, and these should be matched to the proposed profiles of the habitat areas (including woodland areas, heathland and acid grass land) to be created. This should also include soil handling, storage and movement methods, designated haul routes etc. A more specific habitat creation scheme should be sought in an updated LEMP, which could be conditioned. Permissive use of footpaths in terms of time of day, number of days of the week or year needs to be provided. Experience at other sites is that the level of access proposed is not always provided as promised or expected.

Part D of the ES (Land Quality) states that much of the Agricultural Land was Grade 3a prior to the creation of the Golf Course but is now likely to be no more than 3b. Even if this is the case the existing soils are likely to still be of good quality, and using existing soils needs to be properly established as the preference should be to strip and re-use these. In addition, importing clay rich soils may work against the overall aim of improving the drainage. This applies to both topsoils and subsoils.

22. **Environment Agency** - Object, to the scheme on two matters, flood risk and impact on fisheries and biodiversity. The submitted Flood Risk Assessment (FRA) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and the checklist. To overcome the flood risk concerns the applicant should submit a revised FRA (which meets the points set out in the EA's letter).

The submitted scheme is also inadequate with regard to the assessment and mitigation of the risks to nature conservation. This is supported by paragraphs 174 and 180 of the NPPF. To ensure the project minimises its impact on biodiversity and complies with relevant policies, the following are required:

- Detailed impact assessment
- Completed watercourse metric
- Updated ecological surveys – aquatic and semi aquatic mammals.

23. **County Environmental Assessment Officer** - No views received.

24. **Forestry Commission** - No views received.

25. **Geotechnical Consultant** - Inconsistencies in the information presented, regarding the proposed volumes of materials to be imported and the area of land the proposal will affect.

Land Quality and Water Quality - The application does not adequately define the baseline or address the potential impacts on land and water quality. There is no site-specific information on current land and water quality provided, and a lack of information regarding the likely nature and composition of the materials proposed to be imported. The ES should include an assessment of the likely impacts of the development on the quality of the underlying aquifer, and this has not been attempted. Instead, the application recognises the potential for impacts and mitigation proposed within the CEMP, however the outline CEMP does not provide any details which can be included in an impact assessment.

Hydrogeology - There is no evidence or justification provided for the qualitative assertions that the site experiences poor drainage and is vulnerable to waterlogging. This baseline information is needed to support the application and inform the environmental impact assessment. Further, the application does not appear to consider the potential impacts and effects of this on the underlying secondary aquifer, in relation to reduced infiltration/recharge.

Flood Risk and Drainage - The Flood Risk Assessment and ES Chapter the Water Environment do not meet the requirements set out in the SCC EIA scoping opinion dated February 2022 and the Environment Agency screening/scoping opinion dated March 2022, as they do not fully assess the impacts of the proposed development on fluvial and pluvial flood risk and the proposed surface water drainage system.

The Applicant indicates that the re-profiling works are to be located only within Flood Zone 1, this cannot be confirmed as there is no analysis of the EA's hydraulic modelling for the Clasford and Wood Street Brooks to refine the fluvial flood extents and determine the impact on the proposed wetland facilities. Until this is done, the baseline has not been adequately or appropriately established and therefore the impact assessment may not be considered robust.

More information is required to assess the impacts of the enlarged/new open surface water/wetland features in relation to flood risk and drainage, and to assess the impacts on the floodplain. It is also important that the application demonstrates that the proposed surface water drainage system is adequately sized to accommodate the anticipated increase in surface water runoff for the design event. The Applicant has not provided

evidence/justification of the likely changes in surface water runoff, that the proposed surface water drainage system has been adequately designed, and that significant effects are therefore unlikely.

Water Framework Directive Assessment – It has not been demonstrated that there will be no impact on the WFD objectives.

Soil Resources - No sufficient baseline information or assessment of the potential impacts to soil resources. Soil resources within the site need to be fully assessed by a soil scientist or agronomist, and that the application supported by a Soil Conservation and Management Plan for the site, prepared as an ES Technical Appendix, that forms the basis for the management and mitigation measures that will be assessed in the prediction of effects.

Stability and Settlement - No information on how the fill material will be assessed in relation to geotechnical properties, how much settlement is predicted, how this will be controlled, and how this may impact the intended drainage at the site, nor how the material will be placed and compacted has been provided. The scoping opinion described that the application would need to be supported by a stability assessment.

- 26. **County Historic Buildings Officer** - Concern is raised with regard to the number and frequency of vehicle movements and whether these are possible given the access width and lack of available space for vehicles to pass or wait, or if a new entrance will be required for the proposals.

The proposal has been assessed in accordance with paragraphs 201 and 205 of the NPPF and is found to be a low level of less than substantial harm to the Grade II Listed North and South Merrist Lodges. This is specifically through the industrial nature of the lorry movements detracting from their rural and country estate setting. This harm will need to be weighed against the benefits of the scheme under paragraph 208 of the NPPF.

- 27. **County Landscape Architect** - Inconsistencies identified with the Contour Heat Map and Cross Section Plans, which are requested to be rectified before full comments can be made on the submitted Landscape and Visual Impact Assessment:
 - The Planning and Design and Access Statements refer to the need for new irrigation reservoirs to be sited above the prevailing ground level. The proposed reservoir in the north-west of the site is shown as above the prevailing ground level on the Contour Heat Plan, which would be consistent with this reasoning. However, as shown on Cross Section D1 -D2 the proposed reservoir is shown below the existing ground level, which appears to contradict the other map and the reasoning.
 - Section line C1 – C2 on the plan view does not seem to correspond with what is shown on the cross-section. For example, the cross-section shows the green at Hole 17, but this is not within the section line C1 – C2 on the plan view.
 - There are two sets of red lines indicating existing topography on Cross Sections A1 – A2 and E1 – E2.
 - There is a red line floating in mid air within Section line C1 – C2, which is assumed to be an error.

Further,

- Hole 14, which is assumed to be in the far north-west corner of the site, is not marked as such on any plans.
- With regard to the proposed water feature at Hole 18, can it please be clarified that this is only a water feature rather than an irrigation reservoir, as the level of this is shown below existing ground levels within Section line E1-E2 of the cross section plan and on the Contour Heat Map.

Where changes are made please can written commentary be provided to clarify these changes so there is no ambiguity.

28. **Lead Local Flood Authority** - Object, the proposed surface water drainage scheme does not meet the requirements set out in the NPPF, its accompanying planning practice guidance (nPPG) and the Non-Statutory Technical Standards for sustainable drainage systems. Further information is required including full details of the surface water drainage and sustainable drainage systems, soakage tests and if infiltration is proposed confirmation of ground water level should be submitted. The application documents also need to demonstrate that the proposal is in accordance with Technical Standards S2, S3 and S9 and how the systems will be maintained for the lifetime of the development.

Following the publication of the Aldershot Road Section 19 Report Ref: 97761, the LLFA confirm that the information provided with the application is insufficient to demonstrate the proposal will not lead to an increase in surface water flood risk to the site and surrounding area.

29. **Natural England** - No specific concerns regarding the impacts upon the adjacent Ash to Brookwood Heaths SSSI which is also part of the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC. The impact of such works on these sites would be most likely to be managed through appropriate working practices on site including a CEMP to account for noise/dust etc and when work is carried out to move soil on to the site and re-profile the course.

Further information is required regarding the soils on site as there appears to have been a large area of grade 3a soil. A detailed Agricultural Land Classification Survey is therefore required.

30. **UK Power Networks** - No views received.

31. **Scottish & Southern Energy** - No views received.

32. **Scotia Gas Networks SGN** - No views received.

33. **County Rights of Way Officer** - On review of the application footpath 463 Worplesdon runs along part of the access route. This has been considered by the applicants and no objections are raised from the perspective of Rights of Way.

34. **County Air Quality Consultant** - Satisfied with the submitted Air Quality Assessment. It is recommended that a Dust Management Plan for the construction phase mitigation measures is secured by condition. It is advised that the applicant uses the measures from the Institute of Air Quality Management (IQMA) 2016 Guidance on the Assessment of Mineral Dust for Planning and IAQM 2014 Guidance on the Assessment of Dust from Demolition and Construction.

35. **County Noise Consultant** - The assessment identifies that noise and vibration from on-site activities will not cause a significant adverse effect on existing noise sensitive receptors. It has been recommended by Anderson Acoustics, that the speed bump at the entry to the Golf Course is removed. As such this should be conditioned.

The assessment of off-site activities is not appropriate. This should be undertaken in accordance with the appropriate technical standard. The assessment does not include any noise sensitive receptors which are located away from the site but could be affected by development led vehicles (e.g. receptors on Holly Lane, St Michael's Avenue, Fairlands Road, Aldershot Road etc). The methodology utilised in the report therefore does not follow a conventional approach.

36. **County Lighting Consultant** - No lighting details have been provided as part of the application documentation.

37. **Surrey Wildlife Trust** - No views received.
38. **Affinity Water Ltd** - No views received.
39. **Thames Water** - No views received.
40. **Great Crested Newt Officer** - Not satisfied that the applicant has adequately demonstrated that there will be no impact to Great Crested Newts (GCN) and/or their habitat as a result of the proposed development. Therefore in line with the guidance from Natural England¹ there is a reasonable likelihood that GCN will be impacted by the development proposals and therefore, the applicant must either:
- Submit a NatureSpace report or Certificate to demonstrate that the impacts of the proposed development can be addressed through Surrey County Council's District Licence or
 - Provide further clarification and ecological information to support a European Protected Species Licence (EPSL) application – this may involve further surveying GCN in the surrounding ponds and submitting a mitigation plan to the LPA to show how impacts on the species can be adequately addressed. This should be submitted prior to determination.
41. **Heathrow Airport Safeguarding** - No airport safeguarding objection to the proposed development.
42. **Minerals and Waste Planning Policy Team** - The development would make use of around 33% of the total volume of C,D&E waste likely to arise in Surrey for one of the two years in which it is to take place. Over the two-years, the volume of C,D&E waste proposed to be deposited on the application site would amount to some 16% of the total volume of C,D&E waste to arise in Surrey over the same period. The proposal would involve diversion of a significant volume of inert C,D&E waste that could otherwise be recycled by Surrey's C,D&E recycling facilities contrary to the Waste Hierarchy (recycling should be prioritised over recovery to land) and SWLP 2020 Policy 1. No evidence appears to be offered by the applicant to demonstrate how the proposed development is likely to impact existing and lawful aggregate or soil recycling facilities in the county (and some 30km of the application site) which rely on C,D&E feedstock. In the absence of any evidence to demonstrate otherwise, the proposed development is likely to be prejudicial to the continued operation of such facilities contrary to SWLP 2020 Policy 7. Further the proposal is contrary to SWLP 2020 Policy 5, as it has not been demonstrated the proposal would give to significant benefits, that the proposal cannot practicably and reasonably be met in any other way and that the minimum volume of C,D&E waste would be used to facilitate the development.

Parish/Town Council and Amenity Groups

43. **Normandy Parish Council** - Object to the proposal on the grounds that excessive vehicle movements will have a large impact on the village and there is no pedestrian crossing for students
44. **Worplesdon Parish Council**- Supports the application subject to:
- The requirement for a banksman at all times during the approved hours of operation
 - The provision of a Construction Traffic Management Plan
 - The provision of a Construction Method Statement
 - The requirement for all construction traffic to enter and leave the college ground by turning left only.

¹ https://naturespaceuk.com/wp-content/uploads/2021/06/DLL-Guidance-Document-for-LPAs-NatureSpace-Partnership_March2021.pdf

- All mud to be swept from the road on a weekly basis, or more frequently, if necessary for highway safety purposes

Additionally, it is requested that a Section 106 bond is obtained to ensure that if the developers enters insolvency during the construction project, sufficient monies will be available to complete the project. A Section 278 Agreement is also requested to secure the funds for a new Toucan crossing near the entrance to Merrist Wood College. In a further comment the Parish seek a view as to whether it would be possible to secure a temporary alternative access into the College to alleviate potential conflict between all users of the college entrance.

45. British Horse Society - No views received.

Summary of publicity undertaken and key issues raised by public

46. The application was publicised by three site notices and an advert in the local newspaper. A total of 421 owner/occupiers of neighbouring properties were directly notified by letter.
47. To date a total of 109 letters of representation have been received in response to the proposal. Of these 107 raise objection and 2 support the proposal. The views expressed are summarised below:

Need

- Dispute the fact that a world class facility is required.
- Inappropriate use of land, no desperate need for this type of facility.
- No benefit to the local community.
- Sheep grazing on course at the moment, no demand for this use.
- There is no 'genuine need for this development' nor does it provide 'significant benefit that would outweigh any significant adverse impacts'.
- Amount of material being brought in will look like they are using the site to dump waste material.
- No consideration to alternative means of remodelling utilising the existing site material to give greater undulations resulting in higher and drier areas and increased designed to be flooded areas.
- Previous golf courses have failed commercially in the area (including Rokers across the road).
- The proposal does not give assurances that the works are not preparing the site for another use.
- A 'pay as you play' offering is not unique locally, therefore does not justify the significant level of disruption.
- It is not clear why so much material is needed.
- No information on the long-term viability of this proposal.
- This is green belt and whilst being put forward as enhancing a Golf Course should be seen for what it is a landfill operation.

Highways, Traffic and Access

- Increased congestion and damage to road surfaces.
- The Transport Studies underestimate the complex nature of the Holly Lane Junction in practice.
- The proposal will increase the risk of injury and potential anxiety for a wide range of users travelling to and from Merrist Wood College and the surrounding neighbourhood, including horse riders, pedestrians and cyclists.
- Proposal fails to recognise the seasonal aspects of Merrist Wood College and the higher traffic levels.
- In the winter the roads are poorly lit, and the visibility splays are limited.

- Visibility splays at the site exit onto the public highway are obscured by an established tree not under the ownership of the applicant.
- The scale of the development exceeds what is reasonable for a joint access road.
- The number of vehicle movements proposed is intolerable without a nuanced management and communication plan.
- The Transport Statement falls to consider all the bus routes including Bus 20, which is a frequent service.
- Accidents on the main road have caused vehicles to crash through the fencing of the residential properties, the risk of which would be increased.
- A pedestrian crossing close to Coombe Lane and Holly Lane should be provided to facilitate access to the most frequently used bus stops.
- The Transport Statement does not account for the Merrist Wood Equine Arena and the carriage rides provided to disabled and neurodiverse users on Wednesday mornings.
- The local roads are already hazardous with speeds in excess of 40mph.
- An alternative access should be considered.
- Two primary Schools near the A323 and many Merrist Wood College students walk alongside and cross the A323 from the bus stop at Fairlands Estate, increased danger to these users.
- Four mini roundabouts on the short section of the A323 and A3 Holly Lane, unsuitable for frequent/additional HGV movements.
- Coombe Lane cannot accommodate two HGVs passing each other. What measures will be put in place to ensure that only one vehicle will pass along Coombe Lane at any time in order to avoid congestion.
- There is no where for HGVs to park should access to the site be blocked for any reason.
- The impact of several lorries arriving at once could cause major grid lock on the roads surrounding the proposed entrance.
- The exit for traffic from the nearby Fairlands Estate is left only, with all traffic having to go around the roundabout at Aldershot Road (end of Holly Lane). Should traffic be at a standstill as a result of this proposal, residents will struggle to enter and exit their homes.
- Coombe Lane is bordered by a narrow footpath on each side of the road from the main gate for a short distance inside the gates. There is no raised kerb along this length, and given the width of the road lorries would mount the path. This will destroy the footway and every 2.5 minutes there will be no safe space for pedestrians entering or leaving the College on to Holly Lane.
- Dirt/mud on the road will be unavoidable, regular sweeping will be needed.
- HGVs travelling through villages and in close proximity to residential properties which line the roads on the route to the site, will cause excessive vibration to houses.
- Holly Lane is not a major Road being only about 4m wide.
- The Traffic Management Plan sets out routes and directions that do not make sense, this coupled with the request by Worplesdon Parish Council that all traffic turns left on exiting Merrist Wood, appears to direct all traffic through Perry Hill.
- Traffic route should be changed to prevent local grid lock.
- There are network of footpaths and private tracks close to the development, which are used for horse riding, walking and to access fields for maintenance and recreation. Merrist College would like to ensure that these routes are retained.

Green Belt

- The proposal should not be considered appropriate development in the Green Belt, as very special circumstances do not exist to allow a world class facility.
- Policy E6 of the Guildford Local Plan is clear in stating that leisure development should 'respect the size, character and function of their setting and comply with national Green Belt policy' which does not indicate a world class facility.
- The impact on the openness of the Green Belt remains significant, the site is visible from Fox Way footpath where the tree line is thin.

Ecology and Biodiversity

- Scale of operations needs to be reduced to protect SSSI, wildlife and residents.
- No lighting details provided.
- Destruction of well-established local and rare habitats to create man made and artificial landscapes with waste materials.
- Oak trees removed by owner prior to the submission of the application.
- Concerns for the welfare of the local wildlife, including small herd of six to eight deer and 56 different species of birds.
- The site is adjacent to a SSSI, Ancient Woodland and a Biodiversity Opportunity Area. It is a beautiful area with many protected species and should not be subject to development.

Residential Amenity

- Unacceptable levels of noise, vibration and pollution.
- Disruption for local residents for over two years is unacceptable, scale and time of the operations needs to be reduced.
- Excessive noise and air pollution for two years risking the health of local residents.
- Constant noise, dust and debris.
- Concern for damage to properties from the volume of vehicles and vibration.
- Resident wellbeing will be impacted.
- Negative impact on the outlook of properties due to the proposed high bank of earth.
- The proposal is in proximity to the riding School which is sensitive to changing environments and noise.

Flooding and Drainage

- Serious flood issues experienced in the area already that will be exacerbated by this proposal.
- Fairlands Estate is prone to flooding, this has been well documented in the past. Excess ground water runs via ditches behind Fairlands, through the woods, under the A323 Aldershot Road towards Merrist Wood Golf Club. The planning application is proposing to build a four metre barrier just inside their boundary, this barrier would cause water to back up and cause flooding to homes.
- There is no intention in the proposal to modify drainage across the whole site to improve the local flood situation and give back to the community
- No information as to how the development will impact natural floodplains and water courses up and down stream of the site.
- No information on how the water courses that feed the development will be protected and not impacted and that any animals displaced from the development site are managed and controlled to not risk injury or disease to the College's animals, crops, grazing or riding operations.
- Concerns regarding the extra displacement caused to the water table by extra waste being piled and compacted on site.
- The access junction is notorious for localised flooding and the ground could be compromised.
- The volume of earth will inevitably increase the water running off the land onto Holly Lane.
- The S19 Aldershot Road Flooding Report produced by Surrey County Council, highlights the serious issues raised by the recent investigation into the ongoing risk of flooding along Aldershot Road and the unknown effects of the proposal at the Golf Course.

Heritage

- There are two Grade II Listed buildings at the entrance and a sleeping policeman as the HGVs go over the bump they will send shock waves into the Listed buildings.
- The Listed Woodpecker Lodge Holly Lane/Coombe Lane is a residence, and it is just five metres from Coombe Lane and 30 tonne trucks may do damage to the footings and walls.

Other Matters

- Given that SCC are the waste management authority, it seems possible that this proposal may offer a convenient solution for storage and disposal of a large volume of material. If so, what confidence can residents have that the final decision on the proposal will be independent of SCC's clear vested interest.
- What control will there be on the inert waste to ensure nothing illegal is dumped on the site.
- More information needed about where the material is coming from and what it might contain.
- What guarantee is there that the plans will be strictly adhered to and the land returned to a wild area as stated in the plans.

Officers Note: This planning application is determined by Officers of the County Planning Authority. As set out in Introduction section of this report, the scheme has been assessed against the policies of the Development Plan, comprising the Surrey Waste Local Plan 2020, Surrey Minerals Plan 2011 Core Strategy Development Plan Document 2011, Guildford Borough Council Local Plan: Strategy and Sites 2019-2034 and Guildford Borough Local Plan: Development Management Policies 2023 and any other material considerations relevant to the determination of the application. In this regard, whilst the aim of the County Planning Authority is to ensure that sufficient capacity is provided within the County to meet the Waste needs of the County, each application is assessed on its own merits against the Development Plan and any other material considerations.

48. In support of the application the following views were expressed:

- 141 HGV movements are a tiny proportion of the general movements of vehicles taking place in the area.
- Opportunity to have a first class golf club facility in the area.
- The redevelopment of the site will bring opportunities for local employment, prestige for the area and the possibility of an events venue.
- Better than the alternative, which could be housing.

Planning considerations

Introduction

49. The guidance on the determination of planning applications contained in the Preamble/Agenda frontsheet is expressly incorporated into this report and must be read in conjunction with the following paragraphs.
50. In this case the statutory development plan for consideration of the application consists of the Surrey Waste Local Plan 2020, Surrey Minerals Plan 2011 Core Strategy Development Plan Document 2011, Guildford Borough Council Local Plan: Strategy and Sites 2015-2034 and Guildford Borough Local Plan: Development Management Policies 2023.
51. There is no adopted Neighbourhood Plan covering the area in which the application site is situated.

52. Surrey County Council, as the Minerals and Waste Planning Authority is currently preparing the Joint Minerals and Waste Local Plan (MWLP) and a Reg 18 Issues and Options consultation was held between November 2021 and March 2022, which included a 'Call for Sites'. A comprehensive Waste Capacity Need Assessment (WCNA) for the period 2026 to 2042 (WCNA) was published on SCC's website in April 2024, and a second 'Call for Sites' exercise took place from 20 November 2023 to 29 February 2024. The next step in preparing the MWLP will be a Reg 18 Preferred Options Public Consultation (Draft Plan) in June 2025. At the time of writing this report, the MWLP is at an early stage of preparation and does not attract any weight in the determination of this application. However, the WCNA is a material consideration for planning applications, and is an objective and quantitative assessment that determines the waste management capacity gap in Surrey for each principal waste stream. This document is also used to inform the preparation of the SCC's Authority Monitoring Report (AMR), and the continued preparation of the MWLP and application of its strategies and policies once updated.
53. In considering this application the acceptability of the proposed development will be assessed against relevant Development Plan policies and material considerations. For planning applications accompanied by an Environmental Statement (ES) the environmental information contained in it will be taken into consideration and reference will be made to it.
54. In assessing the application against Development Plan policy it will be necessary to determine whether the proposed measures for mitigating any environmental impacts of the development are satisfactory. In this case the main planning considerations are: the principle of the development in the Metropolitan Green Belt; waste management need; highways, traffic and access; impact on heritage; flood risk and drainage; environment and amenity matters including landscape and visual impact, noise, air quality, ecology and biodiversity and soils and contamination; and the impact on the Metropolitan Green Belt.

Environmental Impact Assessment

55. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 , as amended ("the EIA Regulations"), concern the assessment of the effects of certain public and private projects on the environment. Development proposals falling under Schedule 1 of the EIA Regulations require an Environmental Impact Assessment ("EIA") in every case. Projects falling within Schedule 2 only require an EIA where the development is likely to have a significant environmental effect. The proposed development falls within the scope of paragraph 11(b) of Schedule 2 of the EIA Regulations – installations for the disposal of waste (unless included in Schedule 1).
56. The proposed end-use of the development site falls within the scope of paragraph 12f) of Schedule 2 – golf courses and associated developments. EIA has been recommended as required, on the following grounds:
- The proposal exceeds the indicative threshold of 10ha in Schedule 2 for new waste management facilities (paragraph 11b, Schedule 2), and the indicative threshold of 50,000 tonnes of waste per year (paragraph 11b, Schedule 2);
 - the area affected by the development is adjacent to a number of the categories of sensitive areas as listed in Regulation 2 of the EIA Regulations;
 - the site is bisected by the Clasford Brook and Wood Street Brook, a surface water body classified by the Environment Agency (EA) as exhibiting 'poor' ecological status and 'fail' chemical status, and on land classified as Zone 2 and 3 in fluvial flood risk, the development could alter the function of the floodplains, and give rise to adverse impacts on the water quality and hydromorphology of the watercourse; and
 - the proposal would generate an additional 141 HGV movements per day for the duration of the construction phase, which would not be an insignificant change in

HGV movements from the baseline position and warrants classing the development as 'EIA development'.

57. The purpose of an Environmental Statement (ES) is to enable the decision making body to take full account of the environmental impacts of a proposed development, alongside its anticipated economic or social benefits (as detailed in the submitted Planning Statement) before an application for planning consent is determined. The ES provides environmental information to aid the decision making process.
58. The applicant requested a Scoping Opinion for the proposed development under Regulation 15 of the EIA Regulations. The County Planning Authority (CPA) adopted its Scoping Opinion Report on 11 February 2022 setting out the information the CPA considers should be included in the EIA. The scoping opinion advised that the ES should cover the following topics: Air Quality, Biodiversity, Traffic and Transport, Water Environment and Cumulative Effects. The CPA considered that the following matters did not need to be covered in the ES: Climate, Historic Environment, Landscape and Visual impact, Land and Soils, Population and Human Health and Material Resources.
59. The applicant has submitted an ES as part of the application which considers the main potential environmental effects of the proposed development. The ES complies with the requirements of the EIA Regulations and addresses all of the requirements set out in the Scoping Opinion issued by the CPA. The applicant has also included Chapters on Land and Soils and Material Resources, in response to the Scoping Opinion consultation comments received from Natural England and the Environment Agency.
60. In terms of key statutory environmental constraints, the ES concludes that the proposal will not affect any nationally or regionally important designated sites. The ES concludes there would be no overall likely significant impacts on Air Quality and Dust, Biodiversity, Land Quality, Waste and the Water Environment and there will be no likely significant cumulative effects arising from the proposal. In relation to an assessment of the main alternatives, there is no discussion within the ES with regard to alternatives. Section 9 of Volume 2 of the ES refers to alternatives and defers to the Planning Statement and Design and Access Statement, however these documents do not offer any further assessment of alternatives. In overall conclusion, the ES finds that no negative significant effects are predicted from the construction or operational phases of the proposed development.
61. The ES forms part of the environmental information that the CPA is required to consider when determining an application for planning permission for EIA development (Regulation 26(1). Regulation 2 of the EIA Regulations defines the term "environmental information" as encompassing, "...the environmental statement, including any further information and any other information, any representations made by anybody required by these Regulations to be invited to make representations, and any representations duly made by any other person about the environmental effects of the development". The CPA has therefore taken account of the views expressed by statutory and technical consultees and by third parties in reaching its conclusions with reference to the likely significant environmental effects of the proposed development.
62. Regulation 26(1)(b) of the EIA Regulations require the planning authority to reach a reasoned conclusion on the significant environmental effects of the proposed development, taking into account the environmental information. Regulation 26(1)(c) of the EIA Regulations requires planning authorities to integrate their conclusions on the significant environmental effects of the proposed development into their decision on the grant of planning permission. The submitted ES includes chapters on the following topics (see bullet list below). The CPA's conclusions on the likely significant environmental effects of the proposed development on each of these topics is addressed in detail in the sections of this Officer Report listed below.

- Air Quality (covered in Part B of the submitted ES) – the CPA’s conclusions in respect of the impact of the proposed development on air quality – covering emissions of dust and of pollutants from vehicles – are set out in paragraphs 210 to 229 of this report.
- Biodiversity (covered in Part C of the submitted ES) – the CPA’s conclusions in respect of the impact of the proposed development on biodiversity – covering on-site habitats and species and nearby designated sites – are set out in paragraphs 230 to 263 of this report.
- Land Quality (covered Part D of the submitted ES) - the CPA’s conclusions in respect of the impact of the proposed development on land and soil quality and stability are set out in paragraphs 264 to 274 of this report.
- Traffic and Transport (covered in Part E of the submitted ES) - the CPA’s conclusions in respect of the traffic and transport impacts of the proposed development are set out in paragraphs 107 to 127 of this report.
- Materials and Waste (covered in Part F of the submitted ES) - the CPA’s conclusions in respect of the impact of the proposed development on material resources and waste arisings and management are set out in paragraphs 81 to 106 of this report.
- Water Environment (covered Part G of the submitted ES) - the CPA’s conclusions in respect of the impact of the proposed development on the water environment - including water quality, resources and flood risk - are set out in paragraphs 148 to 173 of this report.

PRINCIPLE OF THE DEVELOPMENT IN THE GREEN BELT

Surrey Waste Local Plan Part 1 – Policies 2020 (SWLP 2020)

Policy 9 – Green Belt

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

Policy P2 – Green Belt

Policy E6 – The Leisure and Visitor Experience

63. The application site lies within the Metropolitan Green Belt. Paragraph 142 of the NPPF (2024), attaches great importance to Green Belts, with the fundamental aim of Green Belt policy being to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The five purposes of the Green Belt are set out at Paragraph 143 of the NPPF (2024).
64. Green Belt policy guards against inappropriate development. Paragraph 153 of the NPPF (2024) confirms that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances and that substantial weight is given to any harm to the Green Belt and that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. This is echoed in Policy 9 of the SWLP 2020 and Policy SP10 of the TDLP 2014.

Inappropriate Development

65. Paragraph 154 of the NPPF (2024) states that development in the Green Belt is inappropriate unless one of the exceptions at a) – h) apply. Paragraph 155 goes on to set out that the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:

“a. the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan, b. there is a demonstrable unmet need for the type of development proposed, c. the development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework, and d. where applicable the development proposed meets the “Golden Rules” requirements set out in Framework paragraphs 156 and 157.”

66. If the application site is to be considered appropriate under paragraph 155 of the NPPF (2014) all of the requirements listed in paragraph 155 would need to be met.
67. The applicants position as set out in the submitted Planning Statement is that Policy 9 of the SWLP 2020, does not apply in this case because the Policy is directed at ‘actual waste management facilities’ rather than the construction of landscaping projects using waste. The applicant goes on to confirm that the proposal is for the provision of a facility for outdoor sport and/or recreation and therefore falls in principle within the exceptions at former NPPF paragraph 149(b) (provision of appropriate facilities for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it)², paragraph 149(g) (limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use)³ and 150(b) (engineering operation)⁴ and that it can satisfy these exceptions provided it would not have a greater impact on the openness of the Green Belt than the existing development. It is the applicants view that there is no language in the drafting of the exemptions to suggest that, if a Golf Course is created by landscaping imported waste soils, this would push it outside of the ambit of the exceptions.
68. Officers recognise that the proposal effectively comprises the redevelopment of an existing Golf Course to provide an improved facility. With regard to the exemptions listed at paragraph 154 of the NPPF (2024), the application site is not defined as ‘Previously Developed Land’ in accordance with the Glossary to the NPPF (2024) as such the exemption under paragraph 154 (g) (limited infilling or the partial or complete redevelopment of previously developed land..) does not apply in this case. With regard to the exemptions under paragraph 154 (b) (provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings for outdoor sport, outdoor recreation, cemeteries and burial grounds) and h)(i) (engineering operation), development is only exempt where it preserves the openness of the Green Belt, and does not conflict with the purposes of including land within it. These matters are discussed further below.

Impact on Openness and Purposes of the Green Belt

69. In assessing the likely effects upon openness and purposes of the Green Belt, relevant considerations include; spatial aspects, such as the siting, nature and scale of the proposed development; visual aspects of the proposal in its local context; the degree of activity likely to be generated; and its duration and remediability.
70. The applicant’s argument that the proposal does not impact openness is based on the planning appeal decision of *Belview Golf Ltd v East Hertfordshire DC* [2019] PAD 28, in which planning permission was sought for soil importation for the purposes of re-profiling a Golf Course. The applicant has not provided any specific details in relation to the

² Now paragraph 154(b) of the NPPF (2024)

³ Now paragraph 154(g) of the NPPF (2024)

⁴ Now paragraph 154(h) of the NPPF (2024)

application site, but draws on the findings of the Inspector in the Belview case to highlight that a holistic approach should be taken to the assessment of openness and not focused on a narrow technical approach.

71. In respect of the proposed works and the degree of harm to openness, the proposal would involve the deposit and engineering (by plant and machinery) of a significant volume of waste that would result in a permanent change to the existing landscape. Officers consider that no direct comparison between the current proposal and the Belview Golf Ltd appeal as quoted by the applicant exists. In this case, the proposed development would result in the substantial remodelling of the existing site, which includes additional mounds of material, particularly on the southern boundary of the site. This would therefore result in visual harm to views into the site and from the surrounding rights of way network.
72. Further, Officers consider that the degree of activity generated over the construction period including the use of heavy plant, machinery and the volume of HGV movements, when coupled with the long-term change to the land, would have a greater impact on openness than the existing development. As such the proposal is not considered to preserve openness in the Green Belt.
73. With respect to the purposes of the Green Belt, of most relevance to this proposal is Purpose c) (to assist in safeguarding the countryside from encroachment). It is the Officers view that a key objective of Purpose c) is to preserve the natural landscape and rural character of areas surrounding urban settlements, in order to avoid encroachment. In the context of this application, it is proposed to permanently alter the shape and overall appearance of the land through the importation of a significant amount of waste material. As set out further within this report, insufficient information has been provided to satisfy Officers that the quantity of material and resulting appearance of the site is appropriate within the context of this site and when assessed against the policies of the Development Plan.
74. It is therefore considered that the proposal may appear incongruous within the existing landscape and could result in overly unnatural or artificial landforms in some areas of the site. However, it is acknowledged that the site is in an existing Golf Course use and as such the proposal will not result in a change to the use of the land or extend that use beyond the existing site boundaries, as such the proposal is considered to result in a minor conflict on encroachment which is limited to the visual changes of the site through the creation of an engineered landscape, which could appear more urbanised in this regard. As such Officers consider that the exceptions set out in paragraphs 154(b) and (h) of the NPPF (2024) would not apply.

Grey Belt Assessment

75. The glossary of the NPPF (2024) defines grey belt as comprising “*previously development land and/or any other land that, in either case, does not strongly contribute to any of the purposes (a), (b), or (d) in paragraph 143 of the NPPF (2024). Grey Belt excludes land where the application of the policies relating to the areas or assets in Footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.*”
76. Footnote 7 of the NPPF (2024) includes ‘*areas at risk of flooding or coastal change.*’ The application site is situated in Flood Zones 1, 2 and 3. The Clasford Brook flows through the centre of the site from the western boundary to the north-eastern boundary, this is designated as a main river. The Wood Street brook which is also a main river joins the site in the south-western corner and flows north before entering the Clasford Brook. Due to the presence of the Clasford and Wood Street Brooks, there is a large band through

the centre of the site which is identified as within Flood Zone 2 and 3, whilst the rest of the site to the north and west, and south-east of the Brooks is Flood Zone 1.

77. Since the submission of the application, Surrey County Council (SCC) has published the Aldershot Road Section 19 Report Ref: 97761, which documents five separate flood incidents along the Aldershot Road in 2024. As set out at paragraphs 28 and 22 above the Lead Local Flood Authority and Environment Agency, statutory consultees for this proposal, have raised objection to the proposal on the grounds of insufficient information to demonstrate that the proposal would not result in an increase in flood risk (surface water and fluvial) to the site and the surrounding area.
78. Taking the above into account, it is clear that matters relating to flood risk would in this case provide a strong reason for the refusal or restriction of the proposal, and therefore the application site would not be considered grey belt land in the context of these local circumstances and as such the development could not be assessed under paragraph 155 of the NPPF (2024) in this regard.
79. To summarise, Officers consider that the proposal comprises inappropriate development in the Green Belt. In accordance with paragraph 153 of the NPPF (2024), Policy 9 of the SWLP 2020 and Policy P2 of the GBLP 2015-2034, inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very special circumstances (VSC). When considering any application for planning permission, the Local Planning Authority should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness and VSC will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal is clearly outweighed by other considerations.
80. The following sections of this report will identify areas of *other harm* which need to be weighed in the balance against the very special circumstances which the applicant states exist set out in the conclusions on Green Belt at the end of this report.

WASTE MANAGEMENT

Surrey Waste Local Plan 2020 (SWLP 2020)

Policy 1 – Need for Waste Development

Policy 2 – Sustainable Construction and Waste Management in New Development

Policy 3 – Recycling for inert Construction, Demolition and Excavation Waste

Policy 4 - Sustainable Construction and Waste Management in New Development

Policy 5 – Recovery of Inert Waste to Land

Policy 10 – Areas Suitable for Development of Waste Management Facilities

Surrey Minerals Plan 2011 Core Strategy Development Plan Document 2011 (SMP 2011)

Policy MC5 – Recycled and Secondary Aggregate

Policy MC17 – Restoring Mineral Workings

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

Policy E6 – The Leisure and Visitor Experience

Policy ID4 – Green and Blue Infrastructure

81. The NPPF (2024), does not contain guidance specifically related to the management of waste. National waste management policies and guidance are contained within the Waste Management Plan for England (WMPE) 2021 and the National Planning Policy for Waste (NPPW) 2014. The WMPE 2021 advocates the recovery or recycling of inert waste where possible, in accordance with the Waste Hierarchy and the sustainable management of waste. In this regard, the Waste Hierarchy is enshrined in law and gives

priority to waste prevention, followed by preparing for re-use, to recycling, and then other types of recovery (including energy recovery) and last of all disposal e.g. landfill.

- 7
82. The NPPW (2014) explains that the Minerals and Waste Planning Authority (MWPA) should drive waste management up the Waste Hierarchy and recognise the need for a mix of types and scale of waste management facilities. In this regard paragraph 7 of the NPPW (2014) sets out that when determining waste planning applications, the MWPA should only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan. In such cases, the MWPA should consider the extent to which the capacity of existing operational facilities would satisfy any identified need.

Need

83. Policy 1 of the SWLP (2020) supports proposals which would contribute to achieving the County targets for recycling, recovery and the diversion of the waste from disposal in a manner which does not prevent its management at the highest point practical in the Waste Hierarchy.
84. The Land Raising Statement submitted with the application, accepts that the proposed development, at least in part, involves the deposit of waste to land and that this is a form of waste management. In this regard it is suggested that the purpose of the development is to recover waste not to dispose of it. It is indicated within the submission that the 369,038m³ of inert waste soil to be used to facilitate the development will arise from the C,D&E waste stream. C,D&E waste generally comprises material resulting from the construction or demolition of buildings, ground excavations, or engineering operations.
85. Whilst it is not indicated within the submission where the material will be sourced from, in the CPA's experience this is material that is likely to arise from one or more development sites within 30km of the application site. It is considered that transporting material further than this distance is uneconomical. The applicant is not proposing to process (sort, grade, screen, crush etc) this material on the application site so it is reasonable to assume that the C,D&E waste would arrive at the application site ready to be used without any treatment. Part F: Materials and Waste of the submitted Environmental Statement (ES) dated 13 December 2023, is inconsistent with the other application documents submitted in respect of this application and refers to the importation and deposit of 374,450m³ of C,D&E waste in addition to 'clean naturally occurring soil'. It is therefore not clear if this is different to the 58,753m³ of site derived soil to be generated by constructing and extending waterbodies on the site or whether non-waste materials would also need to be imported to facilitate the development. Importing an additional 58,753m³ of 'clean naturally occurring soil' over and above some 374,450m³ of C,D&E waste would have implications in respect of the number of required HGV movements to and from the application site and other technical assessments submitted with the application.
86. The site is not in an existing waste use, nor is it an allocated site for such use within the SWLP 2020, and it does not fall within an Industrial Area of Search or on land identified for employment uses, or industrial and storage purposes. As such the application site does not meet criteria (i) and (ii) of Policy 2 of the SWLP 2020, nor criteria (i), (ii), (iii), or (iv) of Policy 10 of the SWLP 2020. It is therefore expected that the application would seek to demonstrate that the site is otherwise suitable for waste management when assessed against the other policies in the SWLP 2020.
87. Further, Policy MC5 of the SMP (2011), seeks to facilitate re-use of C,D&E waste at source or its separation and collection for recycling, and in this regard the MWPA has made provision to increase the supply of recycled aggregate in the county by at least 0.8 million tonnes per annum (mtpa) by 2016 and 0.9mtpa by 2026.

88. The Waste Capacity Needs Assessment for the County dated (WCNA) 2023, identifies no shortfall in C,D,&E waste management capacity in Surrey, until 2029. This means that the additional C,D & E waste management capacity (recovery to land) offered by the proposed development would not be necessary until at least 2029, so there is no demonstrable waste need for the development. Should consent be granted for the development, it is likely to take place before 2029 and the emergence of the relevant capacity gap. As such the proposal would be considered contrary to Policy 1 of the SWLP (2020) as it would not contribute to achieving the County's targets, or the management of the waste at the highest point practical in the Waste Hierarchy.

Safeguarding Existing Waste Sites

89. Policy 7 of the SWLP (2020) relates to the safeguarding of existing waste sites and explains that proposals that would prejudice the operation of existing waste management facilities should not be permitted unless it can be demonstrated by the applicant that either: (i) the C,D&E waste recycling capacity and/or safeguarded site is not required; or (ii) the need for the development overrides the need for safeguarding. There are two operational waste management facilities located near to the application site (Sunnyside, Aldershot Road and Cobbett Hill Earth Station, Cobbett Hill Road), which are safeguarded under Policy 7 of the SWLP (2020).
90. The proposed development over the anticipated two year construction period would require some 16% of the total volume of C,D&E waste expected to arise in Surrey over the same period. Consequently, the proposal would involve the diversion of a significant volume of inert C,D&E waste that could otherwise be recycled at existing C,D&E waste recycling facilities contrary to the Waste Hierarchy (recycling should be prioritised over recovery to land) and Policy 1 of the SWLP (2020).
91. Further, Volume B - Part F: Materials and Waste of the ES asserts that the C,D&E waste proposed to be used as part of the development cannot practicably and reasonably be re-used, recycled or processed in any other way. However, no evidence appears to be offered by the applicant to corroborate this assertion or to demonstrate how the proposed development is likely to impact existing and lawful aggregate or soil recycling facilities in the County (and some 30km of the application site) which rely on C,D&E feedstock. In this regard, and in the absence of any evidence to demonstrate otherwise, the proposed development is likely to be prejudicial to the continued operation of such facilities contrary to SWLP Policy 7.

Deposit of Waste to Land

92. Policy MC17 of the SMP (2011) requires that restoration is completed at the earliest opportunity, through the encouragement of progressive restoration. As such it will need to be ensured that where sites are required to be restored using inert material, that the availability of infill material (commonly inert and non-inert waste) is not prejudiced by other developments.
93. Policy 5 of the SWLP (2020) sets out that planning permission for the recovery of inert C,D&E waste to land will be granted where it is necessary to implement mineral restoration and non-inert landfill restoration schemes and for other development involving the deposit of inert waste on land that will not prejudice mineral restoration and non-inert landfill restoration activity within the county if: (i) there is a significant benefit or improvement from the development; (ii) the benefit or improvement cannot practicably and reasonably be met in any other way; (iii) the waste cannot practicably and reasonably be re-used, recycled or processed in any other way; (iv) the use of the inert C,D&E waste replaces the need for non-waste materials; (v) the development involves the minimum quantity of waste necessary.

94. Objections received in response to the proposal, as summarised at paragraph 47, have raised concerns that the applicant has not considered any alternative means of remodelling the Golf Course, and that the proposal does not give assurances that the works are genuine or required to meet a local need. Furthermore, Objectors consider the proposal does not provide benefit to the local community.
95. Officers recognise that although there may be some benefits from the provision of a state-of-the-art Golf Course with improved public access and enhanced biodiversity, improved flood performance, rainwater harvesting measures and an improved business model, as set out within the application documentation, however as there is little quantitative evidence to demonstrate these claims and it is not clear whether they would be significant.
96. In this respect, a key driver for the works appears to be the need to improve the business, however no information has been provided on the existing or projected business forecast nor why this would constitute a planning benefit. In addition, improved flood performance is cited within the application documents, however as referenced above the Environment Agency and Lead Local Flood Authority have objected to the proposal on the basis that the presented scheme does not meet the requirements of the NPPF and the accompanying technical standards. As such evidence has not been provided to demonstrate poor drainage or how the development would result in significant related benefits. The County Geotechnical Consultant has also raised concerns about fluvial flood risk and modelling and several inconsistencies within the application documents. When looking at other elements of the scheme the LVIA indicates a very slight beneficial effect 10 years after the completion of the development and the biodiversity net gain would amount to less than 6% when the Borough Council advocate 20%.
97. Drawing on the above and lack of demonstrable need for the C,D&E waste management capacity, the proposal as presented offers very limited environmental and economic benefits. Accordingly, it is not demonstrated the proposal would give rise to significant benefits contrary to Policy 5 of the SWLP 2020 (i).
98. In terms of the consideration of potential alternatives to the proposed development, there is some discussion within the documentation regarding the previous consideration of the installation of additional drainage instead of earth works, as well as a cut and fill approach, however there is no elaboration on the viability, impact and implications of those alternatives. Section 9 of Volume 2 of the ES refers to 'alternatives' and defers to the submitted Planning Statement and Design and Access Statement, however these documents do not offer any further assessment of alternatives. As such it is not demonstrated that the development cannot practicably and reasonably be met in any other way, contrary to Policy 5 of the SWLP 2020 (ii).
99. Further, it is asserted within the application that the C,D&E waste proposed to be used as part of the development cannot practicably and reasonably be re-used, recycled or processed in any other way. However, no evidence appears to be offered by the applicant to corroborate this assertion. There is also no adequate assessment of the impact of the scheme on mineral site restorations or existing waste facilities. For these reasons the proposal is contrary to SWLP Policy 5 (iii).
100. The use of inert waste replaces the need for non-waste materials if these were to be used instead. So it is reasonable to assume that facilitating the proposed development using inert C,D&E waste would replace the need for non-waste materials, in compliance with Policy 5 of the SWLP 2020 (iv).
101. With respect to the quantity of material, there is no evidence that the minimum volume of inert C,D & E waste would be used to facilitate the development.

Reference to the pre-application proposal and how the proposal has changed since is not sufficient to meet the required threshold in this regard. The CPA would expect to see evidence to demonstrate how the proposal would be compromised if less than 374,450m³ or 369,038 m³ of C,D &E waste were to be used (e.g. by reducing the quantity by 10%, 20%, 30% etc).

102. In addition, the application documentation claims that the proposed development allows for the creation of an extremely high quality, state of the art Golf Course, contributing to Policy aims in terms of the provision of sporting and recreation opportunities, however no evidence has been provided to substantiate these claims, including details of what standards or guidance the course has been designed to or the significance of the facility in the locality, nor the need for them in this location.
103. To elaborate on this further, the Design and Access Statement at paragraph 2.10, when discussing the lifecycle of a Golf Course, provides a footnote reference to the website of the American Society of Course Architects (ASGCA) and indicates that there are a number of online resources which provide further information on the lifecycle of a Golf Course. It is expected that any necessary guidance used or referenced, would be extrapolated and discussed within the application for the CPA and others considering the application to help justify the proposal. Furthermore, the applicant has not provided any information or credible guidance on best practice in course design standards discussed within the application, to help explain what the standards are and how the course has been designed to meet those standards, to enable it to be classed as a 'high standard facility' effectively helping to justify the proposal and the quantity of waste being considered.
104. Further, other Golf Course facilities in the vicinity of the site (including West Hill, Sutton Green, Woking and Puttenham) are quoted in the application documentation as being of a standard that Merrist Wood Golf Club is unable to compete with, however there is no further information on what these standards are and how this compares with Merrist Wood pre and post development. The lack of evidence regarding the quantity of material and justification for the course design means that the application has not demonstrated compliance with Policy 5 of the SWLP 2020 (v).

Conclusion

105. Overall, it is not adequately demonstrated that the proposal will contribute to achieving the County's waste management targets, with a capacity shortfall not expecting to arise until 2029. The proposal would also result in the diversion of a significant volume of C,D&E waste material from existing consented facilities within proximity to the site, which would effectively result in the management of the waste material higher up the waste hierarchy, contrary to Policies 1 and 7 of the SWLP 2020.
106. Further, Officers consider that that the applicant has failed to provide adequate evidence to demonstrate that the proposal complies with Policy 5 of the SWLP 2020 and would not prejudice the availability of fill material within the County generally in accordance with MC17 of the SMP (2011), to demonstrate that there is a beneficial need for the proposal, that it cannot be met in any other way and that importantly the minimum volume of waste necessary to achieve the proposal is proposed. Officers therefore consider, the proposal has not sufficiently demonstrated compliance with Policies 1, 7 and 5 of the SWLP 2020.

HIGHWAYS, TRAFFIC AND ACCESS

Surrey Waste Local Plan 2020 (SWLP 2020)

Guildford Borough Local Plan: Strategy and Sites 2015-2034

Policy ID3 – Sustainable Transport for New Developments

107. Paragraph 115 of the NPPF (2024), is clear that in assessing applications for development, it should be ensured that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. Paragraph 116 of the NPPF (2024) goes on to confirm 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.
108. Appendix B of the NPPW 2014 states that in testing the suitability of sites for waste management the CPA should bear in mind the nature and scale of the waste management facility and consider the suitability of the road network and the extent to which access would require reliance on local roads, the rail network and transport links to ports.
109. Policy 14 of the SWLP 2020, requires proposals to demonstrate that it would not result in unacceptable impacts on communities and the environment. The term 'unacceptable impact' should be interpreted in accordance with current national and local planning policy and planning guidance relevant to, *inter alia*, public amenity and safety including impacts caused by fumes and vibration and cumulative impacts arising from the interactions between waste developments, and other forms of development.
110. Further, Policy 15 of the SWLP 2020, requires waste developments to demonstrate that where practicable and economically viable, development makes use of rail or water for the transport of materials and transport links are adequate to serve the development or can be improved to an appropriate standard. Where the need for road transport has been demonstrated the development should ensure that waste is able to be transported using the best roads available, which are usually main roads and motorways, with minimal use of local roads, the distance and number of vehicle movements associated with the development are minimised, the residual cumulative impact on the road network of vehicles movements associated with the development will not be severe, there is safe and adequate means of access to the highway network and the vehicle movements associated with the development will not have an unacceptable impact on highway safety when compared against current national and local guidance. In addition, low or zero emission vehicles, under the control of the site operator, are used which, where practicable, use fuels from renewable sources.
111. Policy ID3 of the GBLP 2015-2034 requires new developments to contribute to the delivery of an integrated, accessible and safe transport system, maximising the use of sustainable modes. Where a new development would generate significant amounts of movement, the proposal is required to be supported by a Transport Statement and require a Travel Plan which is proportionate to the size of the new development.
112. Officers recognise that in accordance with Policy 15 the site does not have access to accept or transport material to and from the site via rail or water. In support of the application, the applicant has submitted a Transport Statement (TS) dated September 2023.
113. The TS assesses the impact of the importation of 369,038m³ of soil over a two year period, operating Monday to Saturday. Officers recognise as stated above this is not consistent with the figure of 374,450m³ presented in Part F: Materials and Waste of the ES and three year construction period assessed in documents submitted in support of

the application. The applicant calculates that there will be 141 daily trips over the two year period, as a worst-case scenario. As the source of the inert material is unknown, these trips are anticipated to be spilt over two routes (northern route via A322/M3 and southern route via A323/A3), over the course of an anticipated six hour period (9am to 3pm), to avoid peak hours on the highway. Junction modelling of Holly Lane/Coombe Lane has been undertaken to assess the operational capacity of the junction with the development traffic utilising the junction. The applicant asserts that the existing junction remains to operate well within capacity with minimal queues.

114. In terms of the trip rates once the Golf Course is operational, the applicant anticipates that these will increase back to the levels when the Golf Course first opened, as in recent years they have declined. In this regard, the applicant assesses that these trips will be accommodated on the local highway network with negligible impact.
115. A number of public objections have been received in response to the proposal, which are summarised at paragraph 47 of this report. Objectors are raising concern regarding the impact of HGV movements on congestion already experienced in the area and the damage that could arise on the road surfaces. Further it is considered that the proposal could increase the risk of injury and potential anxiety for a wide range of users travelling to and from the Merrist Wood College and other road users including horse riders and cyclists which use the shared access. Objectors also comment that the access off Holly Lane onto Coombe Lane is too narrow for two HGV to pass each other, which could therefore result in HGVs queuing on the public highway impacting existing road users and businesses and could result in dangerous conditions for pedestrians. In this regard, it is suggested that an alternative access should be provided and a new pedestrian crossing close to Coombe Lane on Holly Lane.
116. Worplesdon Parish Council, whilst in support of the application, have also raised the need for a number of measures relating to the management of vehicles, as summarised as paragraph 44, however they also seek a view on whether it would be possible to secure a temporary alternative access for the works.

Trip Generation

117. In terms of the trip generation, the submitted TS confirms that the expected daily construction delivery movements associated with the proposed works would be 141 two-way trips, and that these would occur between 9am-3pm (a 6 hour period) for 24 months, Monday to Saturday. The TS concludes at paragraph 7.4 that this would represent a total of 11.7 trips per hour, however Officers recognise that this is misleading as it only represents one-way movements (arrivals or departures) and the two way trips per hour would actually be 23.5 ($141/6 = 23.5$).
118. Officers also acknowledge that this would equate to 142 movements split across a 6 hour day, totalling 24 movements an hour (12 in and 12 out), resulting in a vehicle arriving at the site every 2.5 minutes⁵ Monday to Friday. This coupled with the length of time each HGV is anticipated to be in the site, which is cited to be 10-20 minutes at a time and the fact that vehicles cannot pass each other at the access point off Holly Lane or on Coombe Lane, means it is unclear as to how this scheme is possible without causing a significant build-up of traffic on the public highway, and Coombe Lane, and within the site. This is of course exacerbated with the shared access requirements with Merrist Wood College.
119. It is also necessary in this respect to consider any likely cumulative impacts in the local context. As such Officers are aware of a recently approved planning application at Merrist Wood College, Ref: 23/P/01375 dated 7 May 2024, for the demolition of existing

⁵ This figure is 141 (single movements) divided by 6 (hours) would equal 24 movements. 60 minutes divided by the 24 movements equals 2.5 minutes.

buildings and glass houses located across both the north and south site and replacement with a new glasshouse of 1120sqm and a new single storey teaching block in the north site and a new two storey teaching block with double height workshop and store all with associated access and hard and soft landscaping. The cumulative impact of the proposals being constructed at the same time, therefore would need to be considered in light of the shared access and the increase in the volume of HGV traffic.

120. The County Highway Authority (CHA) was consulted on the application, as set out at paragraph 44 above. The CHA raise three points of concern with the proposal, including the above point regarding the presentation of vehicle movement figures within the submitted TS and consider that further clarity and update is required in order to make an assessment of the likely impact of the proposal. In addition, clarification and update is sought on the modelling provided for the site access junction with Holly Lane. As indicated above, the uplift in vehicle movements which have been applied to the modelling include an additional 12 Passenger Car Units (PCU) per hour each for arrivals and departures, totalling an additional 24 PCUs per hour. Whilst the total additional movements are expected to be 23.5 per hour, this is a 'number of vehicles' figure and not a PCU value. PCU is a value applied to the modelling exercise to represent the different impacts on junction capacity which result from different vehicle types. To properly represent the impacts of HGV traffic on junction performance, the correct PCU value per HGV is 2.3. As such, the PCU value of the additional 23.5 HGVs per hour would be 54.05 PCUs, which is over double the figures applied to the modelling. The modelling exercise is therefore required to be updated to reflect the actual PCU values of the anticipated vehicle traffic.
121. Further the CHA consider that additional modelling evidence is required to assess the potential impacts on the A323 roundabout junction with Holly Lane, given that there is no certainty at this stage in terms of vehicle routing, this assessment should ensure that 100 per cent of vehicles will route south via this junction in order that the assessment is suitably robust.

Access

122. The TS sets out that the importation of material will use the existing access from Holly Lane via Coombe Lane. This access serves Merrist Wood Golf Course, Merrist Wood College and the associated college facilities including the farm and equestrian centre. The existing access measures 5.8m, with visibility splays of 2.4m x 120m north-east and 2.4m x 93m where Holly Lane meets a roundabout junction. It is the intention of the applicant to cut back any vegetation near to the access to maintain the visibility splays.
123. It is set out within the TS that HGVs accessing and egressing the proposed development would utilise routes from the A3 and M3 to the application site. The intention appears to be to avoid Guildford Town centre.
124. In terms of the access junction from the Holly Lane, the CHA raise concern that the vehicle tracking provided in the TS as shown on Drawing No:11939/2101 Rev P1 demonstrates that the existing access junction is of insufficient width for two large vehicles to pass. Given that there is an expected rate of 12 HGV arrivals and 12 HGV departures per hour, there is a relatively high chance of departing vehicles meeting arriving vehicles at this junction, with the potential for multiple HGVs to be departing/arriving at the same time. Further, whilst Coombe Lane does not form part of the public highway, it is a public right of way route (footpath 463) and the above referenced lack of suitable carriageway width to accommodate HGV movements and the relatively high risk of multiple HGVs needing to pass each other represents a potentially severe risk to the safety of any pedestrians on the footway.
125. It is noted that Objectors and Worplesdon Parish Council, would like a temporary alternative access into the site to be considered, however the County Planning Authority

can only assess the application as submitted. As such if the applicant wished to consider an alternative access, this would represent a material change to the current planning application and result in the need for a new planning application to be submitted to the County Planning Authority for determination. Further, Objectors have also raised the need for a crossing point near the access to the site off Holly Lane, however no pedestrian protection measures have been advanced by the applicant as part of the submission.

- 126. Further to the above Officers recognise that the applicant has submitted an outline Construction Traffic Management Plan (CTMP) which refers to the use of a banksman and warning to drivers of the significance of the Listed Buildings either side of the access point. However, as set out further below, Officers do not consider this is sufficient to overcome these concerns. Whilst matters such as a banksman, construction management plans and mud sweeping can be secured by conditions attached to any grant of planning permission, Officers do not consider that there is sufficient information submitted with the application to understand the level of traffic generated by the proposal and therefore the impact of the proposal and whether the HGV movements required can be safely accommodated in the context of the site and the existing access point.

Conclusion

- 127. On the basis of the above, Officers consider that insufficient information has been provided to allow Officers to make an assessment of the likely impact of the development in terms of vehicle movements. The applicant has failed to demonstrate that the development would not have an adverse effect on the safe and efficient operation of the local highway or that appropriate mitigation measures exist as to minimise or avoid any material adverse impact with regard to highway safety and inconvenience to other road users. As such the development proposed does not satisfy the requirements of Policies 14 and 15 of the SWLP 2020 and

IMPACT ON HERITAGE

Surrey Waste Local Plan 2020 (SWLP 2020)

Policy 14 – Protecting Communities and the Environment

Guildford Borough Local Plan – Strategy and Sites 2015-2034

Policy D3 – Historic Environment

Policy E6 – The Leisure and Visitor Experience

Guildford Borough Local Plan: Development Management Policies 2023

Policy D18 – Designated Heritage Assets

Policy D19 – Listed Buildings

- 128. The application site is located on the former farmland and gardens associated with the Grade II Listed Merrist Wood House, situated approximately 255m from the application site. As part of Merrist Wood House, a Lodge House was constructed at the entrance to the grounds off Holly Lane, referred to as the Merrist Wood Lodge South. A North Lodge referred to as Woodpecker Lodge was constructed later opposite the Merrist Lodge South, with the main access to the grounds running between the buildings. Both buildings are Grade II Listed, and part of their setting is their position at the entrance to the site as well as their open surroundings. The Lodge Houses are located either side of the access point to the application site.
- 129. A 1930s Bargate Stone wall complements the Lodges owing to its small scale and use of local materials. As the wall pre-dates 1 July 1948, it is curtilage Listed. Other nearby Listed buildings comprise the Clasford Farm House (Grade II Listed),

located to the south of the A323 Aldershot Road, approximately 210m to the nearest boundary of the application site and 0.8km from the application site access.

- 7
130. Part B, of Policy 14 of the SWLP 2020 is focused on the prevention of unacceptable impacts on communities and the environment. The policy supports proposals where it can be demonstrated that it would not result in unacceptable impacts on community and the environment and includes the historic landscape, comprising sites or structures of architectural and historic interest and their settings, and on sites of existing or potential archaeological interest or their setting. Criteria E of Appendix B of the NPPW 2014 states that in testing the suitability of sites the CPA should consider the potential effects on the significance of heritage assets, whether designated or not, including any contribution made by their setting.
 131. Policies DC3 of the GBLP 2015-2034 and D18 of the GBLP DMP 2023, require the conservation and enhancement of the historic environment in a manner appropriate to its significance and applications to be supported by an evidence based Heritage Statement. The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the NPPF (2024).
 132. Policy D19 of the GBLP DMP 2023, specifically relates to Listed Buildings and expects development proposals to conserve, enhance and where appropriate better reveal the significance of Listed buildings and their settings. Where harm to significance is identified this will be considered against Policy D18(3). Criteria 3) of the Policy D18 of the GBLP DMP 2023, requires that development proposals which result in harm to, or loss of, the significance of a designated heritage asset will be considered in line with national policy and guidance.
 133. A Heritage Statement dated 12 September 2023, has been submitted in support of the application. The Heritage Statement assesses the significance of all four Grade II Listed buildings within proximity to the application site and identifies that the vast majority of the significance of the Listed buildings is contained within their physical fabric, with a small contribution deriving from their immediate settings. The Heritage Statement asserts that the application site does not play a part in the heritage significance of the Listed buildings identified.
 134. Objections received in response to the proposal, as summarised a paragraph 47, raise concern that the size and volume of vehicles associated with the proposal could cause damage to the footings and walls of the Listed buildings at the access to the site, which are also residential properties.
 135. In accordance with Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990, special regard must be had to the desirability of preserving the buildings or their settings or any features of special architectural or historic interest which they possess in considering whether to grant planning permission for development which affects a listed building or its setting. Paragraph 212 of the NPPF (2024), states that when considering the impact of a proposed development on the significance of designated heritage assets, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
 136. The submitted Heritage Statement assesses that the proposal will not result in any physical alterations to the Listed buildings identified, however potential effects could arise from: HGV movements between the two Listed Lodge houses during construction; earth moving within the site during construction; and the operational result of the re-profiling of the application site. On assessment of each heritage asset identified, it is concluded that there will be no harm to the setting or

significance of the Merrist Wood House or Clasford Farm House. However the HGV movements at the entrance to the site (junction of Holly Lane with Coombe Lane) would temporarily affect the setting of the Grade II Listed Lodge Houses (Merrist Wood Lodge and Woodpecker Lodge), by making it more industrial in character than was intended when the Lodges were built. This is therefore assessed as causing a low level of '*less than substantial harm*' to the significance of the Lodge houses.

137. The applicant advances within the Heritage Statement that there is no intention to widen the access, and the Bargate Stone Walls located at the front of the two Lodge Houses, are protected by an existing kerb and narrow footway, which means that vehicles are unlikely to strike the buildings. However, as a precaution the applicant has set out within the submitted Outline CTMP dated September 2023, that drivers will be warned of the need to be particularly careful when entering the access. The applicant also identifies that the Lodge Houses may be subject to more vibration than they would normally receive during the three-year period, as a result of HGV movements through the site entrance, however it is indicated by the applicant that there is no evidence that this would harm the listed buildings, and no additional mitigation measures are therefore proposed.
138. In response to the application the County Listed Buildings Officer (CLBO), as set out at paragraph 26 above, raises concern with regard to the frequency of vehicle movements that would pass in between the Lodge Houses entering or exiting the site during the specified times and whether the proposal is possible, given that two lorries cannot pass each other at the entrance and paragraph 5.12 of the submitted CTMP states that '*the contractor will not permit any HGVs associated with the proposed development to be laid up or waiting on Holy Lane at any times*'. Notwithstanding the above, the CLBO agrees with the findings of the Heritage Statement, that there will be a low level of less than substantial harm to the Grade II Listed North and South Merrist Lodges. This is specifically through the industrial nature of the lorry movements detracting from their rural and country estate setting. In accordance with paragraph 215 of the NPPF (2024) this harm would need to be weighed against the public benefits of the proposal.
139. Paragraph 215 of the NPPF (2024), confirms that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. In this regard, at paragraph 4.46 of the Planning Statement the applicant advances that the harm identified should be weighed against the public benefits outlined within the submission and that the proposal is in accordance with Policy E6 of the GBLP 2015-2034, which weighs in favour of granting permission.
140. As set out at paragraph 95 of this report, whilst it is acknowledged that there may be some benefit from the provision of a state-of -the-art Golf Course with improved public access, enhanced biodiversity and improved flood performance, it is not clearly demonstrated within the submission how these would be delivered on the site and to a standard accepted by the relevant consultees. With regard, to Policy E6 of the GBLP 2015-2034, whilst no specific reference is made to Golf Course facilities, support is given to the provision of new and enhanced leisure and visitor attractions, provided that they respect the size, character and function of their setting and comply with national Green Belt Policy. As set out within this report, the applicant has failed to provide adequate evidence to demonstrate the proposal is suitable in terms of its scale, character and impacts arising in accordance with the relevant policies of the Development Plan and that the less than substantial harm to the significance of a designated heritage asset is outweighed by the public benefits of the proposal in accordance with paragraph 215 of the NPPF (2024).

141. Further, Officers recognise that the Heritage Statement assesses the impact of the proposal on the identified heritage assets over a three year construction period. As set out elsewhere within this report, the construction period for the proposal and quantity of material proposed to be imported to the site, is not consistent within the application documentation and as identified by the County Highway Authority and picked up by the CLBO, more certainty is required with regard proposed vehicle movements. As such Officers are concerned that the conclusion of the Heritage Statement may not accurately present the harm arising from the proposal on the heritage assets identified.
142. Moreover, in accordance with Policy D19 of the GBLP DMP 2023, Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 and Paragraph 212 of the NPPF (2024), Officers recognise the need for the conservation, and preservation of the heritage assets and in particular the Lodge Houses at the access point. In this regard, great weight should be given to their conservation, irrespective of any potential harm, as such Officers are not satisfied that the measures presented by the applicant are sufficient enough to protect the physical façade of the buildings and associated Bargate Stone Walls from the impact of vehicle movements or potential strikes, including the impacts arising from vibration, during the construction period. Whilst the applicant has submitted a Noise and Vibration Impact Assessment (NVIA), dated September 2023 in support of the application, the assessment carried out with respect to vibration is limited and not based on the specific conditions or structural integrity of the Listed buildings.

Archaeology

143. Further to the above, the application is also supported by an Archaeological Advice Note dated 10 August 2023. The submitted Advice Note confirms that the site was archaeologically investigated in advance of the original Golf Course construction by AOC Archaeology in 1996 with work comprising the excavation of 32 trial trenches targeted at features identified on aerial photography and areas where substantial ground disturbance was planned. As explained within the note the results were negative and no evidence of pre 19th century features were encountered despite the presence of the historic farmstead in the area investigated.
144. The County Archaeological Officer (CAO) was consulted on the proposal, a summary of their response can be found at paragraph 19 of this report. The CAO identifies that the archaeological potential for the site is low, and when combined with the fact that the proposed remodelling of the course will be largely achieved by the importation of material, it is considered very unlikely that the proposal will impact on any buried archaeological remains.
145. Further, the Surrey Historic Environment Record does identify that there is an aircraft crash site from 1942 present on the site between the 14th and 15th fairways of the Golf Course, marked by a memorial to the deceased air crew, which although partially excavated in 1997 falls under the Protection of Military Remains Act 1986. Therefore prior to any development works within the area of the crash site as identified by the memorial and 100m around it, a licence will need to be obtained from the Ministry of Defence, to allow such works to continue. The submitted Archaeological Advice Note acknowledges this requirement and confirms that no excavation is proposed in the area of the crash site and the memorial will be sensitively relocated following the proposed landscape works. As such the CAO raises no archaeological concerns in this regard.

Conclusion

146. On the basis of the above, whilst there are no archaeological concerns arising as a result of the proposal, Officers acknowledge that the proposal will result in a less

than substantial harm to the Grade II Lodge House buildings, which is not clearly outweighed by the public benefits of the proposal in accordance with paragraph 215 of the NPPF (2024). As set out above, the public benefits of the scheme are not clearly defined by the applicant and significant concern has been raised by consultees with regard to the stated improvements to the land from the proposed scheme.

147. Furthermore, Officers are not satisfied that the true impact and therefore likely harm of the proposal has been presented due to the inconsistencies within the submitted documents with regard to the timescale of the construction period and number of vehicle movements. Further with regard to national and local policy, Officers are concerned that adequate provision has not been made to protect the Grade II Lodge House buildings from the associated vehicle movements. As such the development proposed does not satisfy the requirements of Policy 14 of the SWLP 2020, Policies D18 and D19 of the GBP DMP 2023 and Policy D3 of the GBLP 2025-2034.

SURFACE WATER DRAINAGE AND FLOOD RISK

Surrey Waste Local Plan 2020 (SWLP 2020)

Policy 14 – Protecting Communities and the Environment

Guildford Borough Local Plan – Strategy and Sites 2015-2034

Policy P4 – Flooding, flood risk and groundwater protection zones.

Guildford Borough Local Plan: Development Management Policies 2023

Policy P10 – Water Quality, Water Bodies and Riparian Corridors

Policy P11 – Sustainable Surface Water Management

148. Paragraph 170 of the NPPF (2024), states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
149. Paragraph 181 of the NPPF (2024), is clear that where appropriate planning applications should be supported by a site specific flood risk assessment and development should only be allowed in areas at risk of flooding where, in light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that: within the site, the most vulnerable development is located in areas of lowest flood risk, the development is appropriately flood resistant and resilient, it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate, any residual risk can be safely managed and safe access and escape routes are included.
150. Paragraph 182 of the NPPF (2024) sets out that applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. Sustainable drainage systems provided as part of proposals for major development should:
- a) take account of advice from the Lead Local Flood Authority;
 - b) have appropriate proposed minimum operational standards; and
 - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.
151. Paragraphs 055 (Reference ID: 7-055-20220825) and 056 (Reference ID: 7-056-20220825) of the Planning Practice Guidance (nPPG) outline that sustainable drainage systems are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Whether a sustainable drainage system should be considered will depend on the proposed development and its location, for example

where there are concerns about flooding. These systems may not be practical for some forms of development. As defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015, sustainable drainage systems should be provided unless demonstrated to be inappropriate. With regard to these systems the aim should be to discharge surface run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.

152. Part B, of Policy 14 of the SWLP 2020, supports proposals where it can be demonstrated that it would not result in unacceptable impacts on the community and environment and includes flood risk arising from all sources and impacts on the quality and quantity of surface water and ground water resources. The NPPW 2014 Appendix B Criteria A, also requires consideration of the proximity of vulnerable surface and groundwater or aquifers and the suitability of locations subject to flooding, with consequent issues relating to the management of potential risk posed to water quality from waste contamination also needing particular care.
153. The application site is known to have a complex hydrology, and is shown to be at risk of Surface Water Flooding (1 in 30/100/1000 annual probability surface water flood events) and Fluvial Flooding with a large band through the centre of the site falling within Flood Zones 2 and 3, around the Clasford Wood Street Brooks. The remaining site area falls within Flood Zone 1. The type of development proposed includes engineering operations comprising level changes, the creation of new lakes and ponds and the installation of an irrigation system.
154. Policy P4 of the GBLP 2015-2034, states that development at medium or high risk of flooding will be permitted provided that: the vulnerability of the proposed use is appropriate for the level of flood risk on the site; the proposal passes the sequential and exception test (where required); a site-specific flood risk assessment demonstrates that the development, including the access and egress will be safe for its lifetime, taking into account climate change, without increasing flooding elsewhere, and where possible, will reduce flood risk overall; the scheme incorporates flood protection, resilience and resistance appropriate to the character and biodiversity of the area and the specific requirements of the site; when relevant appropriate flood warnings and evacuation plans are in place; and the site drainage systems are appropriately designed, taking account of storm events and flood risk up to 1 in 100 year change with appropriate allowance for climate change. Further, all development proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water runoff. Proposals should have regard to appropriate mitigation measures identified in the Guildford Surface Water Management Plan or Ash Surface Water Study.
155. Policy P10 of the GBLP DMP, goes on to set out that development proposals in the vicinity of a waterbody are required to demonstrate that they have explored opportunities to improve its chemical and ecological status and all non-residential development, that would have a very high water usage to include water collection and storage measures. Further Policy 10 requires the retention or reinstatement of an undeveloped buffer zone on both sides of a main river measuring a minimum of 10 metres from the top of the riverbank that is supported by a working methods statement, detailing how the buffer would be protected during construction, and a Landscape and Ecological Management Plan (LEMP) detailing how it will be enhanced in the long-term.
156. In addition, Policy P11 of the GBLP DMP, requires major development proposal to follow the discharge hierarchy and prioritise the use of National Flood Management (NFM) and Sustainable Drainage Systems (SuDs) for all surface water that is not captured for later

use. Alternative drainage systems may be used only if there is clear evidence that SuDs would be inappropriate.

157. The application is supported by a Flood Risk Assessment chapter, dated 3 October 2023 submitted as part of the ES. The FRA details that there are a number of ditches present within the existing Golf Course, along with several large lakes. The drainage ditches feed into the Clasford Brook which flows through the centre of the site from the western boundary to the northeastern corner, which is designated as a Main River. The Wood Street Brook which is also a Main River adjoins the site in the south-western corner and flows north before entering the Clasford Brook. The Clasford Brook joins the Hoe Stream 500m to the north of the site.
158. The majority of the site is shown to be located within the Clasford Brook and Wood Street Brook Water Framework Directive (WFD) catchment area, with part of the north-west of the site falls within the Hoe Stream (Normandy to Pirbright) catchment area. These catchment areas are not designated as artificial or heavily modified, however they were classified in 2019 as poor and fail for ecological potential and chemical condition.
159. The applicant confirms that the drainage across the site is primarily through the existing sub-surface Golf Course drainage (e.g. off fairways, greens and tees) and naturalised flow paths overland typically following lower lying features and/or where the ground is more compacted. A network of ditches/open drains are also present, together with paths which may form a compacted preferential flow path to the valley bottom. There is the likelihood of the percolation of surface water into the underlying sandy soil and a flow path downslope into the lower lying watercourses via through flow.
160. A number of public objections have been received in response to the proposal, raising concern regarding the flood issues already experienced in the area, and the concerns that the volume of material proposed may affect the water table and exacerbate the flood issues in the locality. Representations have also referred to and provided a copy of the S19 Aldershot Road Flooding Report produced by Surrey County Council, highlighting the serious issues raised by the recent investigations into the ongoing risk of flooding along Aldershot Road and the unknown effects of the proposal at the Golf Course. These concerns are registered in paragraph 47 above.
161. The land is currently used for outdoor sport and recreation and the intention of the works is to improve the playability of the Golf Course and to reduce the risk of flooding to the condition of the course. In accordance with Policy P4 of the GBLP 2015-2034, outdoor sport is considered to be 'water-compatible' within the flood risk vulnerability classification and is, therefore, appropriate to the flood risk of the site. Any development should however demonstrate that the development should remain operational and safe for users in times of flood, should not result in the loss of floodplain storage and should not impede water flows or increase flood risk elsewhere.
162. It is advanced within the FRA that due to the water compatible nature of the development and the lack of development within Flood Zones 2 and 3, the sequential and exception tests as set out at paragraphs 173 to 179 of the NPPF (2024) do not need to be applied and the proposal is considered to be appropriate with respect to flood risk on this basis. The FRA recommends that a condition be placed on any grant of planning permission to secure a detailed drainage strategy with confirmation of an overall reduction in downstream flood risk as a result of the additional and enhanced water features and improvements in habitats on the site.
163. The Environment Agency (EA), Lead Local Flood Authority (LLFA) and County Geotechnical Consultant (CGC) have been consulted on the proposed development, a summary of their comments can be found at paragraphs 22, 28 and 25 of this report. The responses identify concerns regarding the lack of sufficient detail to support the claims made within the application. In this regard, the EA comment that the submitted FRA does

not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 (Reference ID: 7-020-20220825) to 21 (Reference ID: 7-021-20220825) of the NPPG Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development.

164. Further to the above the EA have highlighted that the submitted evidence does not provide a reason why importing soil to raise the ground level is an appropriate method. It is the EA's view that it may be possible to modify existing ground levels to provide new landscape and flood management using natural methods. Further, it is unclear whether the works will take place within 8 metres of a main river. The Flood Zone needs to be identified in relation to the works and the main river, the level of flooding for flood risk with an allowance for climate change needs to be identified. This calculation will also need to be applied to floodplain storage. The location of any walls or fences which may impede flood water flows need to be identified on the map, as do the position of any bridges and culverts.
165. The LLFA have also raised concern with the information presented by the applicant, and acknowledge the applicants desire to deal with these matters via planning condition, however given the type of application the LLFA have indicated that a drainage strategy should be provided prior to the determination of the application and be agreed in principle, with only detailed information provided at a later stage by planning condition if necessary. In addition, soakage test results would be expected to accompany all planning applications and if intrusive investigations cannot be undertaken the applicant should provide justification and evidence as to why.
166. The LLFA has also considered the application against Technical Standards S2 and S3 (peak flow control) and S9 (flood risk within the development) of the Department for Environment, Food and Rural Affairs, Sustainable Drainage Systems, Non-statutory technical standards for sustainable drainage systems, dated March 2015⁶, and note that no evidence has been provided to demonstrate that these have been sufficiently met. Further, the County Geotechnical Consultant is not satisfied that sufficient information has been provided with respect to the proposed water storage lagoon, including its volume and how it is anticipated to be filled.
167. With regard to the concerns raised in the representations received in response to the application, the LLFA comments the S19 report states that *'Five flooding events have affected properties on Aldershot Road, Flod Grove Land and Halifax Close in 2024. The first occurred during Storm Henk on 4 January 2024, followed by subsequent floods on 1 August 2024, 8 September 2024, 14 October 2024, and 27 November 2024 during Storm Conall. So far, a total of 86 properties are known to be affected, flooding internally or externally, with the Halifax close development being affected by flooding on the private roads/ highway. These are shown on the annotated site map in Annex B. Several properties have been flooded more than once with one property flooding on four occasions.'* In this regard, the LLFA highlight that given the known flood issues in the area and the complex hydrology, the information provided as part of the application is insufficient to demonstrate how the proposal will not lead to an increase in surface water flood risk to the site.
168. Officers acknowledge that the applicant has advanced that the proposal does not fall within the parameters by which the sequential and exception tests need to be applied, however paragraph 175 of the NPPF (2024) details that the sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements would be located on an area that would be at risk

⁶ [Sustainable Drainage Systems: Non-statutory technical standards for sustainable drainage systems \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/414242/Sustainable_Drainage_Systems_-_Non-statutory_technical_standards_for_sustainable_drainage_systems.pdf)

of flooding from any source, now and in the future (having regard to potential changes in flood risk). The applicant indicates that no development as proposed will take place within the areas of the site that are at risk of flooding, however the Flood Zone detail has not been provided in relation to the works. On review of the Drawing No: 864.99, Contour Heat Map, dated 01/02/24 submitted in support of the application, Officers note that it is evident that some land raising and re-profiling works are likely to take place within the large central band of the site falling within Flood Zones 2 and 3. This includes the changes proposed to the profile of the land in the south-western corner of the site, around the proposed 2nd and 3rd holes, where an increased elevation of 4.5m is proposed.

169. In light of the above, Officers consider that in the absence of any further information, the sequential test is likely to be applicable to the scheme. In accordance with paragraph 174 of the NPPF (2024) the aim of the sequential test is to steer development to areas with the lowest risk of flooding from any source and development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
170. Officers recognise that there are large areas of the site, particularly to the north-west, which fall within Flood Zone 1. As such further information would be required from the applicant to determine whether on the application of the sequential test, the scheme could be directed to areas of the site with the lowest risk of flooding. If this is not possible, in accordance with paragraphs 177 and 178 of the NPPF (2024) the exception test needs to be applied. To pass the exception test it should be demonstrated that: the development would provide wider sustainability benefits to the community that outweigh the flood risk; and the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall. As set out elsewhere in this report it is considered that the applicant has failed to provide adequate evidence to demonstrate that there is a beneficial need for the proposal and that flood risk and drainage matters can be appropriately managed.

Conclusion

171. On the basis of the above, the applicant has not provided sufficient detail with regard to the flood risk and drainage strategy of the site. Officer recognise that the proposal would change ground levels at the site, and there are many considerations that should be addressed as part of the application, including detail on what alternative approaches have been assessed, greater detail on what works would take place within proximity to the water courses on the site, the location of walls, fences, bridges and culverts and how the materials described as inert would impact on the permeability of the site. Detailed information is therefore required to support the submission prior to determination to demonstrate whether the principle of the flood and drainage strategy scheme is acceptable.
172. In this regard, the EA and LLFA are not satisfied that the proposed drainage scheme meets the requirements set out in the NPPF 2024, the NPPG and Non-Statutory Technical Standards for sustainable drainage systems.
173. Taking the above into consideration, Officers consider insufficient information has been provided to adequately assess the impact of the development on the water environment and its ability to control and manage flood risk and drainage in accordance with the relevant standards and tests within the NPPF (2024). Accordingly, the development proposed does not satisfy the requirements of Policy 14 of the SWLP 2014 and Policy P4 of the GBLP 2015-2034 and Policies P10 and P11 of the GBLP DMP 2023, alongside the national requirements of the NPPF (2024) and NPPG, in this regard.

ENVIRONMENT AND AMENITY

Surrey Waste Local Plan 2020 (SWLP 2020)

Policy 14 – Protecting Communities and the Environment

Guildford Borough Local Plan: Strategy and Sites 2015-2034

Policy D1 – Place shaping

Policy D2 – Climate change, sustainable design, construction and energy

Policy P5 – Thames Basin Heaths Special Protection Area

Policy ID4 – Green and Blue Infrastructure

Guildford Borough Local Plan: Development Management Policies 2023

Policy D4 – Achieving High Quality Design and Respecting Local Distinctiveness

Policy D5 – Protection of Amenity and Provision of Amenity Space

Policy P9 – Air Quality and Air Quality Management Areas

Policy P8 – Land Affected by Contamination

Policy D11 – Noise Impacts

174. Paragraph 187 of the NPPF (2024), is clear that planning decisions should contribute to and enhance the natural and local environment by, *inter alia*, protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services; minimising impacts on and providing net gains for biodiversity; and preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.
175. Importantly, Paragraph 201 of the NPPF (2024), highlights that the focus of decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes), and that these regimes should be assumed to operate effectively. Similarly, Paragraph 7 of the NPPW 2014 states that when determining planning applications the CPA should: consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B of the NPPW 2014 and the locational implications of any advice on health from the relevant health bodies, but that the CPA should avoid carrying out their own detailed assessed in these respects; ensure that waste management facilities in themselves are well-designed so that they contribute positively to the character and quality of the area in which they are located; and concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities⁷.
176. Appendix B of the NPPW 2014 sets out a range of locational criteria that needs to be considered when determining planning applications for waste development, bearing in mind the envisaged waste management facility in terms of its type and scale. These factors are discussed further in the relevant sections below.
177. Policy 14 of the SWLP 2020, is split into two parts, A and B. Part A requires proposals to be consistent with the relevant national planning policy with respect to environmental assets, including Sites of International or European Importance for biodiversity or geodiversity or nationally important heritage assets, including scheduled monuments and listed buildings, where they could be affected by the development. In this case the application site is located adjacent to the SSSI, SPA and SNCI.

⁷ In this case the Environment Agency and Guildford Borough Council

178. Part B, of Policy 14 of the SWLP 2020 is focused on the prevention of unacceptable impacts on communities and the environment. The policy supports proposals where it can be demonstrated that it would not result in unacceptable impacts on community and the environment in terms of: impacts caused by noise, dust, fumes, odour, vibration and illumination, the rights of way network, and outdoor recreation facilities; aerodrome and airport safeguarding, including the risk of bird strikes; air quality including impacts on identified Air Quality Management Areas and Clean Zones; the landscape including impacts on the appearance, quality and character of the landscape; the natural environment including biodiversity and geological conservation interests; and any other matters relevant to the proposed development.
179. Further, Policy D1 of the GBLP 2015-2034, requires all new development to achieve high quality design that responds to distinctive local character of the area in which it is set and proposals are expected to maximise the opportunity for linkages between green spaces and public places, and include high quality landscaping that reflects the local distinctive character and reduce opportunities for crime and antisocial behaviour. Policy D5 of the GBLP DMP 2023, requires development 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, in terms of privacy and overlooking visual dominance and overbearing effects of a development, access to sunlight, artificial lighting, noise and vibration and odour, fumes and dust.
180. Objections received in response to the proposal raise a number of amenity concerns including noise, vibration and pollution effects including dust on the local area arising during the construction of the proposal and the changes to the outlook of the properties on the southern boundary of the site. A summary of these concerns can be found at paragraph 47 of this report.

Landscape Character and Visual Impact

181. The application site is situated within the Wyke to Mayford settled and wooded sandy farmland (SS12) Landscape Character Area, as set out within the Surrey Landscape Character Assessment: Guildford Borough, dated April 2014⁸. The character area has a relatively consistent mix of farmland, woodland and settlement and forms the green gap between the urban areas of Woking and Guildford. The key characteristics of this area are the gently undulating landscape, underlain by Bagshot Formation Sand, Camberley Sand Formation Sand, and Windlesham Formation Sand, Silt and Clay solid geology and the mosaic of land uses including areas on intact pastoral and arable field pattern, frequent woodland and copses and heathland common. The character assessment also recognises that there are a small number of golf courses within the landscape.
182. A Landscape and Visual Impact Assessment (LVIA) dated 5 October 2023, has been submitted in support of the application. The LVIA assesses the proposal against three categories: the potential effects on the character of the landscape; the potential effects on selected view point locations and the potential effects on visual amenity, and proposes mitigation measures to reduce any landscape and visual effects associated with the proposed development.
183. Criteria C in Appendix B of the NPPW 2014, sets out that in terms of landscape and visual impacts consideration will include (i) the potential for design-led solutions to produce acceptable development which respects landscape character; and (ii) the need to protect landscapes or designated areas of national importance including Areas of Outstanding Natural Beauty. Policy D4 of the GBLP DMP 2023, requires development proposals to incorporate high quality design which could contribute to local distinctiveness by demonstrating a clear understanding of the place including how the

⁸ [Surrey-LCA-2015-GUILDFORD-Report.pdf](#)

proposal should respond positively to significant views, surrounding context, prevailing character, built and natural features of interest, landscape and the topography.

- 7
184. The LVIA identifies that the landscape character of the site is a 'designed' landscape for recreational purposes and is typical of those found within the area. The land is relatively flat to the eastern half, and gently sloping to the west of the Clasford Brook, rising up in the northwest corner to a highpoint near to Park Farm. Due to the low-lying nature of the site and the surrounding pattern of woodlands, trees and hedgerows, views of the site are identified as being limited to close range views from the Fox Way public right of way 464 to the north of the Site, the upper floors of the residential properties in Halifax Close and the common land at Littlefield and Clasford Commons to the south of the Site. The visual influence of the site beyond its boundaries and immediate or near context is therefore considered to be very limited and as such the site is well contained and enclosed.
 185. The LVIA sets out that the proposals have been informed by an appreciation of the site's location and topography as part of the LVIA process. The intention is therefore to work with the existing topography of the site where possible and avoid significant or abrupt level changes. The mitigation measures as proposed within the LVIA include, retention of the majority of existing trees and woodland, enhancement of site boundary planting and hedgerows, creation of heathland and acid grassland habitats, and new ditches and wetland areas.
 186. The LVIA concludes that there will be some temporary adverse effects during the construction phase of the proposal, from the temporary stockpiling of soil and the disturbance and loss of the existing grassland associated the course, which would be locally prominent and damaging to the overall landscape character. It is considered that the phasing of the works would reduce this impact. In the longer term (year 10) the maturation of the proposal would be more evident, which is concluded to result in a '*very slight beneficial effect*' on the landscape character, due to only minor enhancements offered by the proposal on the key components of the baseline landscape.
 187. In terms of the visual effects, the LVIA concludes that no 'significant' effects associated with the proposed development are predicted. Whilst it is assessed that some adverse visual effects would occur, the range of receptors potentially affected and the associated level of effects predicted, is relatively limited due to the prevailing site context. In this regard, adverse visual effects are predicted from several publicly accessible locations along the Fox Way long distance footpath route to the north of the Site, due to the proximity and elevation of this route. However it is acknowledged that such effects would vary depending on location, proximity, intervening vegetation, and landform and would reduce post construction.
 188. With respect to the residential receptors in proximity to the site, the LVIA identifies that only the properties on Halifax Close and the adjoining residential caravan park at Pine Park to the south of the site are likely to experience effects associated with the proposed development. There are four properties identified to be immediately adjoining the southern boundary of the site. All properties are enclosed by boarded fences and separated from the site but their rear gardens. These properties overlook the proposed development from the upper floors. The applicant indicates that the layout in this part of the site has been designed to reinforce the visual edge of the site with gentle mounding proposed to be planted with native woodland. In this regard, the LVIA identifies some adverse visual effects are predicted during the Construction Phase due to the proximity of these properties to the Site. However, such effects are considered temporary, and are proposed to be managed by the use of temporary hoarding to help screen lower levels views at Pine Park.
 189. Officers recognise that the extent of the works during construction are likely to be visible to those properties that adjoin the site to the south, however the impact would be limited

to during the construction period of the proposal only and the applicant has proposed mitigation to help reduce the impact in terms of protective fencing and the phasing of works. Further, whilst the outlook on to the site is likely to change post construction, given the existing use of the site as a Golf Course and the applicants commitment to planting on the boundary mounding, it is not considered that the proposed changes to the site would result in an unacceptable impact on those properties identified in terms of loss of privacy, overlooking or visual dominance, in accordance with Policy D5 of the GBLP DMP 2023. Further, whilst no lighting details have been provided in support of the application, a condition would be attached to any grant of planning permission to ensure that prior to any lighting installed on the site the details are submitted to and approved by the County Planning Authority. This would ensure that any lighting installed on the site is appropriate in the context of the adjoining residential properties.

190. The County Landscape Architect (CLA) was consulted on the proposal, a summary of their response can be found at paragraph 27. The CLA identifies that whilst the LVIA is broadly robust, and the likely landscape and visual effects arising from the proposal are unlikely to be significant, the applicant has failed to demonstrate that a suitable land modelling and final landform, to achieve the desired outcomes including integration with the surrounding landform, can be achieved.
191. Further and with consideration to the comments of the County Ecologist, the applicant has failed to demonstrate that the proposed lowland heathland and acid grassland habitat could be successfully achieved on the site. This is due to the requirement to import substantial quantities of soil with the correct characteristics (pH, drainage, low nutrient etc) to support such habitats. Officers consider that if the proposal were found to be acceptable this could be conditioned through the provision of a Soil Resource and Management Plan, however given that the proposed habitat would be a positive outcome and mitigation measure of the proposed works, reassurance is required prior to determination that such soils are available in the required quantities.
192. A further mitigation measures as presented within the LVIA is the retention of existing trees, with further planting proposed. An Arboricultural Report dated September 2023, has been submitted in the support of the application. The report includes a Tree Survey, Arboricultural Impact Assessment and Tree Protection Plan. The report details that 147 individual trees and 115 groups of trees were surveyed in total across the site in March 2022. No Tree Preservation Orders were recorded on the site. The report details that 14 individual trees, comprising 11 to accommodate the development and three dead or declining trees, and four tree groups are proposed to be removed (or transplanted) as a result of the proposal. It is further explained within the report that in order to protect the root systems of retained trees during the construction period, it is recommended that 22 tree protection barriers and a vehicle access plan and protocol covering the implementation is adopted.
193. The County Arboricultural Officer (ARO) has been consulted on the application, and notes that the information submitted in the Arboricultural Report is not consistent with the tree loss shown on the Drawing No: 864.55, Trees to be Clearing and Retained, dated 21/02/23, as submitted with the application. In this respect Drawing No: 864.55 shows a significant number of trees to be cleared in order to facilitate the development. Further information is therefore required prior to the determination of the application to understand the true extent of the tree clearance and the impact this may have on the character of the area. Notwithstanding this, Officers recognise that the majority of the trees earmarked for removal are judged as Category C, but with a strong potential to attain a more valuable category, due to their large number and good condition. As such, it is considered that opportunities for the transplanting of these trees are properly considered and demonstrated as part of the proposal, which could be secured by condition should planning permission be granted.

194. Officers recognise that from a landscape character perspective, the site comprises an existing Golf Course, which would be remodelled (albeit substantially) to remain as a Golf Course. When considered in this context, landforms are therefore typical of a Golf Course, as long as they are modest and integrate well within the surrounding area. It is noted that the LVIA assessment undertaken indicates that the net amount of fill over a three year construction period is approximately 369,038m³, which as stated elsewhere within this report is not consistent throughout the application and as such this discrepancy, along with the other inconsistencies identified including the construction period of the proposal, place doubt the findings of the assessment work undertaken. Notwithstanding this, as set out above insufficient information has been provided in order for consultees to make an accurate assessment of the proposed final landforms and necessary information is missing within the application documentation with regard to how key mitigation and beneficial measures proposed as part of the works would be achieved. As such, Officers cannot fully determine that the proposal would integrate sensitively within the context of the wider surrounding landscape.
195. On the basis of the above, Officers consider that insufficient information in relation to the impact of the development on landscape character and visual amenity, and the measures sought to ensure that the landscape mitigation measures are achievable on the site to provide enhancement to the locality in this regard have not been provided. In order to adequately assess the application further information and clarification is required. As such Officers cannot be certain whether the development would have an unacceptable impact in terms of landscape and visual amenity or whether planning conditions could mitigate this impact to acceptable levels contrary to policy 14 of the SWLP 2020 and Policy D1 of the GBLP 2015-2034 and Policy D4 of the GBLP DMP 2023.

Noise

196. Paragraph 198 of the NPPF (2024) sets out that planning decisions should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and quality of life.
197. The Noise Policy Statement for England (NPSE) 2010⁹, sets out the long-term vision of Government Noise Policy. This vision seeks to ‘promote good health and good quality of life through the effective management and control of noise within the context of Government policy on sustainable development’ and is supported by three key aims:
- Avoid significant adverse impacts on health and quality of life;
 - Mitigate and reduce to a minimum other adverse impacts on health and quality of life; and
 - Where possible, contribute to the improvement of health and quality of life.
198. These aims require that all reasonable steps be taken to avoid, mitigate and minimise adverse effects of noise on health and quality of life whilst also taking into account the guiding principles of sustainable development, including social, economic, and environmental and health considerations. The NPSE applies to all forms of noise including environmental noise and neighbour noise, but does not apply to noise in the workplace (occupational noise). The thresholds defined in the NPSE, to assist in the consideration of whether noise is likely to have a ‘significant adverse’ or ‘adverse’ effects on health and quality of life are; No Observed Effect Level (NOEL), Lowest Observed Adverse Effect Level (LOAEL), Significant Observed Adverse Effect (SOAEL)¹⁰. Regarding the numerical definition of these levels, it is not possible to have a single

⁹ [Noise Policy Statement for England \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/424222/noise-policy-statement-for-england-2010.pdf)

¹⁰ NOEL – This is the level below which no effect can be detected. LOAEL – This is the level above which adverse effects on health and quality of life can be detected. SOAEL – This is the level above which significant adverse effects on health and quality of life occur.

objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations. Consequently, the SOAEL is likely to be different for different noise sources, receptors and at different times.

199. Criteria J of Appendix B of the NPPW 2014, requires consideration of the proximity of sensitive receptors, including noise and vibration of goods vehicle traffic movements to and from a site.
200. Policy D11 of the GBLP DMP 2023, requires development proposals to clearly identify any likely adverse noise impacts on the existing nearby sensitive receptors, including the natural environment. Where evidence of an Observed Adverse Effect level noise impact exists in accordance with the Noise Exposure Hierarchy, the applicant is required to demonstrate how the proposed development will be designed and implemented in order to prevent and avoid any SOAE levels and to mitigate any present and intrusive LOAE levels. A verification report is required to be submitted to the Council and approved prior to the developments occupation or use, which demonstrates the agreed avoidance and mitigation measures have been implemented effectively.
201. The National Planning Practice Guidance (NPPG) at paragraph 019 (ID: 27-019-20140306) sets out that those making development proposals, including those for related similar processes such as aggregates recycling and disposal of construction waste, should carry out a noise impact assessment, which should identify all sources of noise and, for each source, take account of the noise emission, its characteristics, the proposed operating locations, schedules and duration of work for the life of the operation, and its likely impact on the surrounding neighbourhood.
202. In line with the explanatory note of the NPSE, this would include identifying whether the overall effect of the noise exposure would be above or below the significant observed adverse effect level and the lowest observed adverse effect level for the given situation.
203. The Surrey County Council Noise Guidelines dated January 2020, sets out that during normal working hours (weekdays between 07:00 and 19:00 hours), the differences between the rating level and background sound level should be no greater than +5dB. A lower difference may be appropriate at other sensitive times of the day or if other industrial noise sources are already present in the area and the affect the same Noise Sensitive Receptor (NSR).
204. The applicant has submitted a Noise and Vibration Impact Assessment (NVIA) dated September 2023, in support of the application. The NVIA assess the impact of the off-site and on-site vehicle movements and engineering works, in terms of the nearest human receptors to those activities. Two scenarios are assessed within the NVIA. The first is based on the worst-case assumption of all areas being worked concurrently, with the dozers, dump trucks and excavator (associated with each area) operating 100% of the time, and that there are 20 two way lorry movements (based on 144 per day, divided by 7 hours). The second scenario is presented for context, based on one area of work in the centre of the site only.
205. The assessment identifies that noise and vibration from on-site activities would not cause a significant adverse effect on existing noise sensitive receptors and it has been recommended within the NVIA that the speed bump on Coombe Lane just north of the Listed Lodge Houses, at the entry to the Golf Course is removed to avoid vibration impacts. As such this should be attached as a condition to any grant of planning permission.
206. Officers recognise, that as stated previously there are inconsistencies within the assessment documentation with regard to the duration of the proposal, and for clarity the NVIA considers the impact of the project over a three-year construction period. The NVIA also considers a 7 hour construction period per day, whereas the submitted Transport

Statement refers to a 6 hour construction period per day (9am-3pm). Moreover, the County Highway Authority has raised concerns regarding the accuracy of the vehicle movement data presented and indicates that further modelling is required to provide an accurate understanding of the vehicle movements associated with the proposal. As such Officers cannot be certain that the conclusions are of the NVIA accurately reflect the impact of the proposal. Further, there is some interchange in the text between 'vehicle movements' and 'HGVs', as such an assumption has been made that the author assumes that these terms are interchangeable. However, one HGV will create two vehicle movements (i.e. into the site and out of the site).

207. Further to the concerns raised in representations, Guildford Borough Council (GBC) in response to the application have also raised concern regarding the impact of noise on residential properties within proximity of the site, particularly with respect to the noise created by vehicle movements, and the considerable degree of management that would be needed in terms of speed and times. GBC also recommend that an updated Construction Environmental Management Plan (CEMP) and a scheme for limiting noise from the works are secured by condition attached to any grant of planning permission, including the change to the hours of operation for noisy activities only to 07.30 to 18.00 Monday to Friday.
208. The County Noise Consultant (CNC) was consulted on the application, a summary of their response can be found at paragraph 35 above. The CNC notes that the assessment of noise and vibration impact of on-site activities at sensitive human receptors has been undertaken appropriately, and no significant concerns are raised. However, the assessment work undertaken in relation to the off site HGV movements does not follow the appropriate methodology and do not include any noise sensitive receptors which are located away from the site but could be affected by development led vehicles (e.g. receptors on Holly Lane, St Michael's Avenue, Fairlands Road, Aldershot Road etc.), as such further information is sought from the applicant to address these concerns in line with the relevant technical standards and the correct vehicle movement figures.
209. Taking the above into consideration, whilst matters such as the submission of an updated CEMP and the hours of use, including hours for noisy activities can be secured by condition attached to any grant of planning permission, insufficient information in relation to the impact of the development on the noise environment on the amenity of the area has been provided. Officers have also raised concern regarding the accuracy of the data presented given the inconsistencies within the application documentation. In order to adequately assess the application further information and clarification is required. As such Officers cannot be certain whether the development would have an unacceptable impact in terms of noise or whether planning conditions could mitigate this impact to acceptable levels contrary to Policy 14 of the SWLP 2020 and Policy D11 of the GBLP DMP 2023, alongside the requirements set out in national guidance, NPPF (2024) and NPSE 2010 in this regard.

Air Quality and Dust

210. Paragraph 187(e) of the NPPF 2024 states that planning decisions should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution and that development should, where possible, help to improve local environmental conditions such as air quality.
211. The NPPG also provides guidance on air quality and dust. Paragraph 005 (Reference ID-32-005-20191101) recognises that air quality is a consideration relevant to the development management process during the construction and operational phases and whether occupiers or users of the development could experience poor living conditions or health due to poor air quality. Paragraph 006 (Reference ID: 32-006-20191101) goes

on to set out that considerations that may be relevant to determining a planning application include whether the development would: lead to changes in vehicle related emissions in the vicinity of the proposals; introduce a new point source of air pollution; expose people to harmful concentrations of air pollutants including dust; give rise to potentially unacceptable impacts (such as dust) during construction for nearby sensitive locations; and have a potential adverse effect on biodiversity.

212. Policy P9 of the GBLP DMP 2023, expects proposals to have regard to the need to improve air quality and reduce the effects of poor air quality. In this regard proposals must not result in significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designed for their nature conservation value, from any sources of emissions to air. The policy confirms that all major development that has the potential to have significant adverse impacts on air quality or in close proximity to a sensitive habitat is required to be supported by an Air Quality Assessment. A verification report must also be submitted and approved prior to the developments occupation/use which demonstrates the agreed avoidance and mitigation measures have been implemented.
213. Criteria G of the NPPW 2014, requires consideration of the proximity of sensitive receptors, including ecological as well as human receptors, and the extent to which adverse emissions can be controlled through the use of appropriate and well-maintained and managed equipment and vehicles.
214. The proposal would involve elements that have the potential to give rise to air quality and dust impacts, during the construction phase from deposited dust and suspended particulate matter and during the operational phase from the impacts of operational traffic emissions on the local area.
215. The applicant has included within the submitted ES, Part B: Air Quality, dated 5 October 2023. The chapter details that an assessment of likely air quality impacts of the development has been carried out using the Institute of Air Quality Management (IAQM) assessment procedures for both road traffic emissions and dust from the material deposition activities. The applicant details that the proposed development is in an area where the hourly or annual mean of NO² objectives or 24-hr or annual mean PM¹⁰ objectives and PM^{2.5} targets are not likely to be exceeded and so it is not considered further in the assessment. The assessment therefore focuses on the impacts existing human and ecological receptors.

Vehicle Emissions

216. The Air Quality chapter of the ES, details that two routes to the site were evaluated for use by Heavy Duty Vehicles (HDVs) arriving at the site to deposit material. These routes comprise a northern route (Holly Lane – A323(north) – A331- M3) and a southern route (Holly Lane – A323 (South) – A3). Whilst the southern route is preferred as it is shorter and has less residential development, given the unknown location of the inert materials, it is assumed in the assessment that both routes will be used and the HDV movements have therefore been split equally between the two established routes. The applicant has confirmed that neither of these routes pass through an Air Quality Management Area (AQMA).
217. In terms of air quality impacts associated with traffic, the Environmental Protection UK (EPUK)/Institute of Air Quality Management (IAQM) guidance 'Land-Use Planning and Development Control: Planning for Air Quality'¹¹, provides an indicative criteria for determining when an air quality assessment is likely to be required. The threshold criteria are provided as annual average daily light and heavy duty vehicles (HDVs). The

¹¹ [air-quality-planning-guidance.pdf \(iaqm.co.uk\)](https://www.iaqm.co.uk/air-quality-planning-guidance.pdf)

threshold criteria differs depending on whether the traffic generated by the development is likely to travel through a designated AQMA. A change in HDV flows of more than 25 Annual Average Daily Traffic (AADT) within or adjacent to an AQMA or more than 100 AADT elsewhere, indicates that an Air Quality Assessment is required. Where an air quality assessment is undertaken to inform the decision making process it does not, in itself, provide a reason for granting or refusing planning permission. Almost all development will be associated with new emissions if the development is considered in isolation. Any impacts should be seen in the context of air quality objectives and existing air quality.

218. The Air Quality chapter details that the traffic flows from the construction of the proposed development are below the IAQM indicative screening criteria for all roads and the DMRB criteria for establishment of a change in effect. The closest human health receptors are along the A323 and Holly Lane on the access and egress routes. Given the distance to receptors and the good baseline air quality in the area, the proposed development flows are unlikely to cause an increase of more than 5% of the Air Quality Assessment Level ($2 \mu\text{g}/\text{m}^3$) for NO_2 and PM_{10} concentrations at existing human health receptor locations near the road network in an area. Further, it is noted that the measured concentrations in the area are below the NO_2 and PM_{10} annual mean limit values and with traffic flows predicted to be under the 100 AADT HDV and under 25 AADT HDV in AQMAs the effect on existing human health sensitive receptors through traffic associated with the proposed development is considered 'not significant' in this regard.
219. The County Air Quality Consultant (CAQC) was consulted on the application, a summary of their response can be found at paragraph 34 of this report. The CAQA confirms that the construction traffic impacts have been scoped out of the assessment due to the number of HDVs not exceeding the EPUK/IAQM thresholds. The AADT HDV flows are calculated to be 99 which is just below the threshold of 100.
220. Further to the above, five priority habitats are recorded as being present within 2km of the site, including deciduous woodland, lowland fens, lowland heathland, lowland meadows and traditional orchards. There are also 29 ancient woodlands within 2km of the site, including Merrist Wood. Increase in accident and nitrogen deposition (from road traffic emissions) can cause a number of adverse impacts on habitats and the environment, particularly sensitive heathland habitats. In this regard, the County Ecologist has raised concern that it is unclear what screening threshold has been used to scope out the potential impacts from increased nitrogen/acid deposition upon the adjacent SAC/SPA and SSSI. As such clarification is required referring to the Institute of Air Quality Management (IAQM) 'guide to the assessment of air quality impacts on designated nature conservation sites' (May 2020). For air quality assessments for ecology receptors, the 'increase of over $0.4 \mu\text{g}/\text{m}^3$ in NO_x ' is a commonly used screening threshold which is cited in this guidance.
221. Officers recognise that matters relating to the actual number and routing of vehicle movements associated with the proposal as raised by the CHA in response to the proposal, remain to be addressed to provide certainty on whether the traffic flows are likely to remain within the relevant thresholds. In this regard, whilst the CAQC is satisfied with the findings of the report in terms of vehicle emissions, Officers cannot be certain that an accurate representation of the proposed development has been assessed. If estimated additional vehicles movements are likely to exceed the threshold criteria a proportionate assessment of the likely air quality impacts from additional traffic emissions is required. Further in order to provide protection of the sensitive ecological receptors in proximity to the site including the Thursley, Ash, Pirbright and Chobham SAC and Thames Basin Heath SPA, a HGV routing plan would need to be secured via an updated CTMP and secured by Condition attached to any grant of planning permission.

222. In addition, a number of the representations received in response to the proposal raise concern regarding the increased pollution in the area from the associated vehicle movements and earth moving works, which could impact the health of local residents. GBC have also indicated that all vehicles visiting the site and plant and machinery should be compliant with agreed emissions standards and maintained in accordance with the manufactures specification, which would be secured by condition attached to any grant of planning permission.
223. Taking the above into account, further information would be needed to provide certainty that the threshold criteria used to determine the impact of the proposed development on the local highway network and the sensitive ecological receptors in proximity to the site and whether the EPUK/IAQM threshold criteria is likely to be exceeded once the vehicle modelling exercise has been revised. In this respect, the applicant has failed to provide the necessary certainty in the application documentation for Officers to be able to understand the likely impacts of the development on the amenity of the locality and ecological receptors.

Dust

224. There is no specific guidance for the risk of dust impacts. The NPPG does not provide any specific direction on dust assessment methodology for waste planning applications. In the absence of this it is recommended that assessments for waste development are based on the qualitative disamenity dust assessment methods in the IAQM minerals guidance¹², with appropriate modification/amendments made.
225. The applicant's Air Quality chapter details that there is human, dust soiling and ecological receptors within 250m of the site. The predominant wind direction is from the south-west and so the areas to the north and east would be down wind. The closest receptors in the worst case wind direction comprise, Merrist Wood College, the Grade II Listed Lodge Houses, dwellings at Halifax Close, Pine Park, Fair Oaks, Cobbett Road, Merrist Wood farm, Merrist Wood Equine Centre and ecological receptors as detailed above. The application has assessed dust disamenity and ecological effects and concludes that the proposal is likely to result in a slight adverse effect on the Merrist Wood College, Merrist Wood Farm, Merrist Wood Equine Centre, the ecological receptors in the woodland in the site and around the site boundary and the nationally designated ecological receptors, however overall there would be no significant effects to any of the receptors identified.
226. Further the applicant has considered the likely cumulative dust or air quality effects during the construction works that could occur where works coincide with any other works on neighbouring sites. In this regard, the applicant concludes that there are no other sites in proximity to the site which comprise operations similar to that proposed or mineral operations. It is further explained that the risk of effects being significant of any cumulative impact is considered highly unlikely, with embedded and specific mitigation measures in place. For significant cumulative effects to occur during construction, the same receptors would need to be affected at the same time, and to a similar degree.
227. The CAQC confirms that the assessment has been carried out in accordance with the relevant technical guidance and is in agreement with the findings of the dust disamenity and ecological effects assessment and that the worst case impacts will be 'slight adverse', and when considering the residual impacts. Further, the CAQC agrees that these will not be significant, subject to a condition to secure construction phase mitigation measures in a Dust Management Plan (DMP).
228. Officers recognise that the dust impacts of the proposal are likely to be low subject to the implementation of the recommended DMP, however the cumulative effects do not

¹² mineralsguidance_2016.pdf (iaqm.co.uk)

appear to acknowledge the Waste Transfer and Materials Recovery Facility adjoining the south-western boundary of the site, referred to as Sunnyside and operated by John Gunner & Co Ltd or take into consideration the application at Merrist Wood College, Ref: 23/P/01375 approved on 7 May 2024, for the demolition of existing buildings and a new single storey teaching block in the north site and a new two storey teaching block with double height workshop and store all with associated access and hard and soft landscaping. Officers consider that it is likely that these activities, and particularly the operations of the existing waste facility, would occur at the same time as the proposed works, as such the true extent of the likely cumulative impacts of the proposal have therefore not been considered.

Conclusion

229. Taking the above into account, Officers recognise that the impact of dust and vehicle emissions as a result of the proposal are unlikely to result in a significant adverse impact and matters such as a DMP and an updated CTMP to include vehicle routing, could form conditions for the submission of further information. However, given the concerns of the County Highway Authority with regard to the modelled vehicle information, the inconsistencies in the application documentation, the concerns with the cumulative impact assessment and the County Ecologist regarding the assessment of deposition on the sensitive ecological receptors in proximity of the site, Officers cannot be certain of the impact of the development in terms of vehicle emissions and dust or that such impacts can be made acceptable by the imposition of mitigation and planning conditions. As such the proposed development does not satisfy the requirements of Policy 14 of the SWLP 2020 and Policy P9 of the GBLP DMP 2023, alongside the requirements of the NPPF and NPPW in this regard.

Ecology and Biodiversity

230. Section 120 (General duty to conserve and enhance biodiversity) of the Environment Act 2021¹³, places a duty on Surrey County Council to consider biodiversity in the full range of their activities including determining planning applications. In this context, paragraph 193 of the NPPF (2024) sets out that when determining planning applications, local planning authorities should apply the following principles: if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or as a last resort, compensated for, then planning permission should be refused; development on land within or outside of a SSSI, which is likely to have an adverse effect on it, should not normally be permitted; development resulting in loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy; and development whose primary objective is to conserve or enhance biodiversity should be supported.
231. Criteria D of the NPPW 2014, requires consideration of any adverse effect on a site of international importance for nature conservation (Special Protection Areas, Special Areas of Conservation and RAMSAR Sites), a site with a nationally recognised designation (Sites of Special Scientific Interest, National Nature Reserves), Nature Improvement Areas and ecological networks and protected species.
232. Policy ID4 of the GBLP 2015-2034, explains that opportunities will be sought to maintain, conserve and enhance biodiversity, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs). Permission will not be granted for development proposals unless it can be demonstrated that doing so would not give rise to adverse effects on the integrity of European sites, whether alone or in combination with other development. Any development with a potential impact on SPA or SAC sites will be subject to a Habitat Regulations Assessment. Permission will only be granted for development proposals

¹³ Amends Section 40 of the Natural Environment and Rural Communities Act 2006.

within or adjacent to national sites where it can be demonstrated that doing so would not be harmful to the nature conservation interests of the site and its function as an ecological unit.

Habitat Regulations Assessment

233. As set out at paragraph 6 of this report the site is located on the edge of Ash to Brookwood Heaths SSSI which is a component part of the Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC.
234. Policy P5 of the GBLP 2015-2034 sets out that permission will only be granted for development proposals where it can be demonstrated that in doing so it would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths SPA, whether alone or in combination with other development.
235. The application site falls within 400m of the SPA boundary, where Policy P5 confirms that permission will not be granted for development that results in a net increase in residential units and for all other development types within this zone a Habitats Regulations Assessment is required to demonstrate that they will not harm the integrity of the SPA.
236. Further, Regulation 63 of the Conservation of Habitats & Species Regulations 2017 (as amended) requires an 'appropriate assessment' of the implications of projects for a site in view of the site's conservation objectives to be made prior to making a decision on the grant of planning permission. This is commonly referred to as a Habitat Regulations Assessment (HRA). The requirement applies to projects likely to have significant effect, alone or in-combination, on SPAs or SACs.
237. Regulation 27 of the EIA Regulations provides for co-ordination of assessments where a project requires assessment under both the EIA and the Habitats Regulations regimes. For the current application site's proximity to a SSSI also designated part of the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright and Chobham SAC requires consideration through the HRA process. The necessary information has been provided in the submitted Environmental Statement (Appendix C11).
238. The HRA process can involve up to four stages: Stage 1 - Screening; Stage 2 - Appropriate Assessment; Stage 3 - Assessment of alternative solutions; Stage 4 - Assessment of compensation and imperative reasons of over-riding public interest. The HRA process ascertains whether the project would have likely significant effects on the integrity of the SPA or SAC concerned. Mitigation measures are considered at Stage 2 (Appropriate Assessment). The HRA for the current application comprises Stage 1 (Screening) and Stage 2 (Appropriate Assessment).
239. SCC has prepared an HRA report for this application which covers the SPA and SAC designations adjoining the application site. The main issues of concern would be noise and disturbance and dust deposition during the construction phase of the scheme. Natural England has advised the main impacts relevant to the SPA and SAC designations could be controlled by means of a Construction Environmental Management Plan (CEMP), which could be secured by planning condition.
240. Subject to a CEMP being secured by condition, should permission be granted against Officer advice or on appeal, the scheme would not result in likely significant effects on the SPA and SAC.

Impact on Protected Species

241. Policy P6 of the GBLP DMP 2023, aims to safeguard irreplaceable and priority habitats. Proposals that result in loss, damage or deterioration of irreplaceability habitats will be

refused, unless there are wholly exceptional reasons and exceptional benefits of the development proposal outweigh the loss of the habitat. All aquatic habitats, including watercourses and areas of standing water like lakes and natural and or historic ponds, should be treated under this Policy as priority habitat. In addition, Policy P7 of the GBLP DMP, sets out that development proposals, including those exempt from minimum biodiversity net gain standards are required to seek maximum biodiversity gain on site balanced with delivering other planning priorities and to follow the mitigation hierarchy. Development proposals within or adjacent to a BOA are required to contribute towards achieving the objectives of the BOA and to protect and enhance designated and priority habitats and improve connectivity.

242. An Ecological Impact Assessment (EclA), an Ecological Desk Study and an Extended Phase 1 Habitat Survey have been submitted in support of the application, as part of the Biodiversity Chapter, dated 5 October 2023, of the submitted ES.
243. Within the aforementioned documents the application site is described as comprising a mixture of habitats including mature woodland, freshwater streams, large ponds and grasslands, species poor amenity grassland was the dominant habitat within the Site. The Phase 1 Habitat surveys identifies that the site and adjacent land have evidence of being suitable for a number of protected species, including amphibians, bats, badgers, dormouse and reptiles.
244. The EclA assesses the impact of the construction and operational phase of the proposed development on identified ecological receptors. The potential impacts arising from the proposal as assessed within the EclA are: pollution incidents during the construction phase; habitat loss in advance of and during construction; damage/disturbance/harm to flora and fauna during construction (including effects of noise, lighting and vibration); protection of retained habitats and the creation and enhancement of habitats during the construction phase; and habitat management during the operational phase. The EclA concludes that no negative significant effects will occur to important biodiversity receptors, including the legally protected species and designated sites, from either the construction or operational phases of the proposed development.
245. Objections received in response to the proposal, raise concern regarding the destruction of the existing on site local and rare habitats and that the scale of the operation should be reduced to protect the adjoining national and local designations.
246. The County Ecologist was consulted on the proposal, a summary of their comments can be found at paragraph 16 of this report. The County Ecologist comments that the survey work undertaken by the applicant covers the breadth of the likely important ecological features, however the survey data is considered out of date. All habitat and protected species work was completed in 2021 and is approaching three years old. Consequently, in accordance with the best practice advice note from the Chartered Institute of Ecology and Environmental Management (CIEEM) on habitats and species¹⁴ if a survey is between 18 months and three years old an update is required prior to the determination of the application.
247. The County Ecologist has also raised concerns with regard to lack of information and insufficient detail within the EclA with regard to the location of trees with bat roost suitability, the location of the Great Crested Newt (GCN) breeding pond, the location of the dormouse nest, and the locations of the reptile results or and badger setts. In addition, the technical note for GCN is incomplete with several sections highlighted. Section 4.5 references GCN presence in waterbodies 1, 2 and 3 as shown in Figure 2, however Figure 2 refers to waterbodies with letters and doesn't indicate presence/absence. As such there is insufficient detail to demonstrate appropriate protection, mitigation and compensation measures for habitat and ecological receptors.

¹⁴ [Advice-Note.pdf](#)

248. Further, limited information has been presented on how habitat loss will be phased on site (despite the proposals having a five phased plan). Insufficient information has also been provided on how habitats (Clasford Brook, retained woodland) and species will be protected during site works, particularly with regard to reptiles and great crested newts. At present the report reads as if a translocation will be repeated for each phase of clearance and the reptiles repeatedly displaced across the site. With no indication of phasing of habitat creation work in relation to habitat loss, there is insufficient information to have confidence in the species being adequately protected, as is the requirement of legislation. Furthermore, confirmation and evidence are required prior to determination as to whether the applicant is intending to use a District Level Licence Scheme. This is echoed in the comments of the Great Crested Newt Officer.
249. In terms of the bat roost surveys, the Tree Survey report, dated September 2023 submitted in support of the application, details the proposed tree removals to facilitate the scheme, however, is not known whether these trees have suitability for roosting bats (or other protected species). The presence of a protected species is a material consideration when a planning authority is considering a development proposal. It is therefore essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted. As such the results of the bat roost survey are required ahead of determination.
250. The EA have also raised objection to the application on the basis that the assessment and mitigation of the risk to nature conservation are inadequate. In this regard, the EA request that to ensure the project minimises its impact on biodiversity and complies with the relevant policies including the NPPF (2024) and Policies ID4 and P12 of the GBLP DMP 2023, a detailed impact assessment is required to support the application, which provides specific details outlining where development activities will directly or indirectly impact watercourses within the site boundary, a completed watercourse metric and updated ecological surveys, which include semi-aquatic mammals to gain a current understanding of the existing fauna.
251. In addition to the above, it is also identified that the Phase 1 Habitat Survey states that three Wildlife and Countryside Act 1981 Schedule 9 invasive plant species are present within the site, however there is no further mention of these within the Ecology Chapter of the ES. The County Ecologist comments that without mitigation the proposed works could facilitate the spread of these species into the wild (which is an offence). Invasive species are also listed as a 'threat' within the site improvement plan for the Thames Basin Heath SPA/ Thursley, Ash, Pirbright and Chobham SAC which are located immediately adjacent to the site. Further information is therefore expected to be included within the submission to reflect the known presence of these species, with appropriate mitigation and management detailed. As set out within the HRA an Invasive Plant Species Management Plan could be secured by Condition attached to any grant of permission.
252. Furthermore, given the extensive restoration works on site and removal and changes to some of the ponds (and potential adverse impacts to the Clasford Brook) justification is required as to why no aquatic invertebrate surveys are required to inform impacts and mitigation. Clarification is also required as to whether any ponds will need to be drained down and whether a fish rescue would be required (and whether any permits would be required from the Environment Agency). These matters could also be secured via appropriately worded conditions attached to any grant of planning permission.
253. Officers recognise, whilst some matters are able to be addressed by appropriately worded conditions, including an updated Construction Ecological Management Statement (CEMP) and Landscape and Ecology Management Plan (LEMP), fundamentally the applicant has not provided sufficient evidence to satisfy Officers of the

impact of the proposal on the protected species and priority habitats on the site and within proximity to the site and therefore what/if any mitigation is appropriate in this regard. Furthermore, the survey work undertaken is now considered out of date and therefore needs to be updated prior the determination of the application.

Impact on Ancient Woodland

254. As set out at paragraph 5 of this report, the site is located in proximity to Ancient and Semi Natural Woodland. The closest area being Merrist Wood situated approximately 150m to the north-east of the application site. Natural England's Ancient woodland, ancient trees and veteran tree: advice for making planning decisions¹⁵ sets out that consideration should be given to conserving and enhancing biodiversity and avoiding and reducing the level of impact of the proposed development on ancient woodland and ancient and veteran trees. In this regard, ancient woodland, ancient trees and veteran trees are irreplaceable. Therefore, compensation cannot be considered as part of the assessment of the merits of a development proposal.
255. Officers recognise that whilst a proportionate assessment of the impacts of the development on the ancient woodland should have been provided in support of the application, the distance of the application site and lack of receptor pathway indicates that negative impacts arising from the proposal on the ancient woodland are unlikely.

Biodiversity Net Gain

256. Schedule 7A of the Town and Country Planning Act 1990 sets out that every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits. Exceptions to this are set out within the Biodiversity Net Gain: Exempt Developments guidance dated 29 November 2023 (updated 21 August 2024) produced by the Department for Environment, Food & Rural Affairs.
257. As set out within the exemptions this application was made prior to the start of mandatory BNG (12 February 2024) and therefore the statutory framework for BNG does not apply. However, the requirements of both local policy and national guidance to demonstrate 'net gains' for biodiversity are still relevant.
258. The applicant advances within the submitted EclA that a range of environmental measures have been proposed as part of the development based on the identified receptors. The measures include the creation of 7.75ha of lowland heathland habitat throughout the site including along the boundary with the SAC/SPA/SSSI, 15.25ha of woodland, 1.34ha of pond water habitat, 0.41ha of reed bed, 2.27ha of fen habitat and 6.2ha of acid grassland across the site. The applicant also proposes to enhance the existing species poor hedgerows by planting native woody species, and the provision of 10 artificial bat boxes, 10 hibernaculas for reptiles and 20 nesting boxes for breeding birds, alongside other measures for the protection of badgers and the translocation of reptiles.
259. The applicant has submitted a metric in version 4.0 that demonstrates a net gain in area based units of 5.49%, but does not demonstrate gains for hedgerow or watercourse habitats. As they are present on site, net gains for these habitats should be included. Officers recognise that the proposal is exempt from the statutory provision of BNG and in that regard the use of the metric is not necessary in this case, however as evidenced within the Ecology Chapter of the ES, the applicant was encouraged by the County

¹⁵ [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions)

Planning Authority and EA to provide 20% BNG as part of the application during pre-application discussions due to the scale of the proposal and type of development. In this regard, it is evident in the comments of the County Ecologist and EA that more could be achieved to maximise on site gains in accordance with Policy P7 of the GBLP DMP 2023, alongside the use of the Watercourse Metric and a technical note/assessment report to accompany the metric outlining how the proposal meets policy requirements.

260. Further as part of the site is within the Ash, Brookwood and Whitmoor Heaths Biodiversity Opportunity Area, as per Policy 7 of the GBLP DMP 2023, the application should also include details of how the proposal contributes to achieving the objectives of the BOA, and how the applicant is protecting and enhancing the priority habitats of that BOA, and improving habitat connectivity.
261. Officers therefore consider that the information provided in respect of BNG in support of this application is not sufficient and whilst the proposal complies with the requirements of the NPPF (2024) in that a 'net gain' is proposed, the information provided in support of the application does not satisfy Officers that the requirements of Policy 7 of the GBLP DMP 2023 with respect to maximising net gain and the BOA objectives, have been satisfactorily addressed in relation to the proposed development.

Conclusion on Ecology and Biodiversity

262. On the basis of the above, Officers acknowledge that whilst the proposal is not considered to result in or contribute to 'likely significant effects' on the adjoining SSSI, SAC and SPA, the applicant has not provided sufficient detail to satisfy Officers with regard to the impact of the proposed development on the ecology and biodiversity of the site, the protection of priority habitat and protected species, the impact on trees and the contribution the site would made to the objectives of the Ash, Brookwood and Whitmoor Heaths BOA. Whilst some matters are able to be secured by Condition attached to any grant of planning permission, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted. As such the results of the bat roost survey are required ahead of determination.
263. In this regard, the County Ecologist and EA are not satisfied with the information provided and have raised objection and the proposal is not considered to satisfy the requirements of Policy 14 of the SWLP 2020 and Policies P6 and P7 of the GBLP DMP 2023 in this regard.

Contamination and Soils

264. Policy P8 of the GBLP DMP 2023, requires development proposals that comprise or include land that is known or suspected to be affected by contamination to submit the appropriate site risk assessments. Where insufficient information is provided or the relevant reports indicate that there will be an unacceptable adverse impact on sensitive receptors, which cannot be adequately prevented, avoided, and/or mitigated through appropriate remedial measures, the planning application will be refused.
265. The applicant has submitted as part of the ES, Part D: Land Quality and Soils, dated 14 December 2023. This document seeks to determine the baseline of the site and the sensitivity of the land in relation to the potential risks arising from the importation and deposit of the proposed waste material.
266. The applicant has focused their assessment on the construction phase of the proposal and identifies that there is a negligible to very low risk of encountering existing or current contaminated land as a result of the proposed development. This is explained within the assessment to be due to the extensive disturbance and modification of the native soils

including additional drainage, irrigation and intensive management from the construction of the original Golf Course. The applicant therefore assesses the agricultural grade of the land as 3b, and indicates that it does not represent the best and most versatile land

267. Further it is explained that all groundworks and the handling of subsoil and topsoil materials are proposed to be carried out in accordance with 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' (DEFRA, 2009). The applicant emphasises that the details of the construction operations would be set out within a Construction Environmental Management Plan (CEMP), which could be secured by condition attached to any grant of planning permission.
268. Objections received in response to the proposal have also raised concerns regarding the control of material being imported to the site, and what assurances will be provided as to the quality of imported material to ensure that what is proposed to be delivered will be.
269. The applicant explains that the majority of the waste material proposed to be imported to the site will be inert, arising from local construction and demolition projects and the scheme will be undertaken in accordance with a bespoke waste permit to be obtained by the Environment Agency. Consequently, quality and suitability of the materials being brought to site, would be regulated through that process, which is separate to the Planning regime. In accordance with paragraph 201 of the NPPF (2024), the County Planning Authority (CPA) should assume these regimes will operate effectively to protect the land from any environmental risks in this regard.
270. Notwithstanding the above, the County Geotechnical Consultant (CGC) has indicated that the submitted Land Quality and Soils chapter of the ES does not adequately define the baseline or address the potential impacts on land and water quality. No on site assessment of the land quality or the nature and composition of the materials to be imported to the site has been provided. Further it is considered that the soil resources within the site need to be fully assessed and information on how the fill material will be assessed and how much settlement is predicted is required.
271. Natural England have also commented that further information is required regarding the quality of the existing soils on the site, as there appears to be a large area of Agricultural Grade 3a soil (some 36ha on the site), which is defined within the glossary of the NPPF (2024) as representing the best and most versatile agricultural land. This appears to have been recorded when the golf club was originally surveyed prior to the clubs construction. This is also identified by the County Enhancement Officer. A detailed Agricultural Land Classification Survey is therefore required to be undertaken to determine the exact gradings. Officers recognise that if soil of this quality is still present on the site, the use of these soils needs to be properly established within the application details, as the preference should be to strip and re-use these rather than bury them under imported soils.
272. Further Guildford Borough Council, have commented, that should planning permission be granted suitable measures should be put in place to validate all deposits to the site and investigate any undetected contamination and the responsibility of the EA, Surrey County Council and Guildford Borough Council are explained to the applicant. As set out above, the CPA should not duplicate the responsibilities of the EA, however the details of the responsibilities of the relevant organisation could form an appropriately worded informative for the benefit of the applicant. A condition could also be attached to any grant of permission to ensure the reporting and relevant remediation of any unexpected contamination found during the works.
273. Officers recognise that the contamination risk of the proposal is likely to be low, due to the inert nature of the material proposed to be imported to facilitate the scheme, which would also be controlled through the EA Environmental Permitting process. Whilst some of these matters are able to be secured by Condition attached to any grant of planning

permission, including the Agricultural Land Classification Survey and the appropriate management of soil in this regard, as set out above information is required to understand the baseline position of the site.

274. It is also acknowledged elsewhere within this report that there are a number of concerns regarding the quantity and quality of the material necessary to deliver the scheme and the mitigation measures as proposed, including the acid grassland habitat, for which a specific soil type is required. As such insufficient information has been submitted to satisfy Officers that the proposed deposit of inert waste material on the site can be appropriately managed in the context of the existing site and avoid potential contamination and as such reassurance on the delivery of the scheme as proposed is required prior to the determination of the application. Officers therefore consider the proposal to be contrary to Policy 14 of the SWLP 2020 and Policy P8 of the GBLP DMP 2023.

GREEN BELT – VERY SPECIAL CIRCUMSTANCES

Surrey Waste Local Plan 2020 (SWLP 2020)

Policy 9 – Green Belt

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

Policy P2 – Green Belt

275. The proposal subject of this application has been concluded to constitute inappropriate development within the Green Belt and by definition is harmful to the Green Belt, failing to preserve the openness and in conflict with the purpose of protecting the Green Belt.
276. In accordance with the NPPF (2024), Policy 9 of the SWLP 2020 and Policy P2 of the GBLP 2015-2034, planning permission will not be granted for inappropriate development in the Green Belt unless it is shown that very special circumstances exist. 'Very Special Circumstances' (VSC) will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal is clearly outweighed by other considerations associated with the proposal, either on their own or in combination.

Green Belt and Other Harm

277. Officers recognise that the application site benefits from an existing lawful use as a Golf Course facility. Officers accept that with regard to the five purposes of the Green Belt, the development would not result in any changes to the physical footprint of the site beyond the existing site boundaries, however the proposal would introduce to the site industrial activities including site support infrastructure, heavy industrial machinery, increased HGV movements and stockpiles of waste.
278. The other harms identified through this report relate to highways, traffic and access, heritage, flood risk and drainage, landscape and visual impacts, air quality, noise and ecology and biodiversity. The CPA should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal, is clearly outweighed by other considerations. Whilst it is acknowledged that the submission of additional information and the imposition of planning conditions could address some of the harm arising, Officers cannot determine based on the submitted information that the proposed redevelopment of the site could be made acceptable through the provision of conditions.

279. On this basis it is considered that the proposed development is harmful as it is inappropriate development in the Green Belt, and there is harm to its openness, as well as other associated harms as identified in the proceeding sections of this report. These other harms must carry substantial weight in the overall Green Belt balance in accordance with Policy 9 of the SWLP 2020 and Policy P2 of the GBLP 2015-2034 and paragraph 153 of the NPPF (2024).

Very Special Circumstances

280. In accordance with national and Development Plan policy, VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Officers recognise that a number of ordinary factors may, when combined together, result in something 'very special'. That is a matter of planning judgement of the decision maker, taking into account any factors presented by the applicant as part of their very special circumstances case. Planning permission should only be granted where very special circumstances exist to clearly outweigh the harm caused to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal.
281. The applicant advances at paragraph 4.45 of the submitted Planning Statement, that if it is considered that the proposal does not fall within any of the exceptions identified, then the potential harm to the Green Belt by reason of inappropriateness is clearly outweighed by '*other considerations*.' The applicant explains that these '*other considerations*' are the benefits outlined in the section on sporting, recreation and economic policy within the Planning Statement.
282. The 'National Sport, Recreation and Economic Policy' section as set out at paragraphs 4.10 to 4.18 of the submitted Planning Statement, emphasis Chapter 8 of the NPPF which concerns the promotion of healthy and safe communities and Chapter 11 of the NPPF with respect to making effective use of land. The following paragraphs of the NPPF are referenced in this regard:
- Former paragraph 92, now paragraph 96 of the NPPF (2024), which aims to achieve healthy inclusive and safe places by promoting social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other, and enable and support healthy lives, for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
 - Former paragraph 93, now paragraph 98 of the NPPF (2024), which states that planning policies and decisions should, amongst other things, guard against the unnecessary loss of valued facilities and services and ensure that established shops, facilities and services are able to develop and modernise and are retained for the benefit of the community. The applicant emphasises that this proposal is in line with these aims.
 - Former paragraph 98, now paragraph 103 of the NPPF (2024), which states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust up to date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. The applicant advances in relation to this paragraph that Golf Courses of a high standard, open to all, are an important part of this and the development also carries with it the potential for new footpath routes and wider public amenity improvements.

- Former paragraph 99, now paragraph 104 of the NPPF (2024), which states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. The applicant emphasis that the proposal is for the continued provision of a high-quality Golf Course but with a complete redesign of the existing.
 - Former paragraph 119, now paragraph 124 of the NPPF (2024), which promotes the effective use of land in meeting the need for homes and other uses, while safeguarding the improving the environment and ensuring safe and health living conditions.
 - Former paragraph 120, now paragraph 125 of the NPPF (2024), which encourages multiple benefits from both urban and rural land, including through missed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improved public access to the countryside, recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production, and promote and support the development of under-utilised land and buildings.
283. Further to the above, it is advanced by the applicant that for all the reasons set out above, it must be accepted that the Golf Course, in its current state, is not of a standard to allow the continuing viability of the course and the redesign as proposed would enable the course to be brought up to standard, making the optimum use of this land in its existing use. In addition, the applicant indicates that the proposal would bring additional benefits in the form of improved drainage of the land and establishing a new heath habitat that will improve biodiversity.
284. The *other considerations* presented by the applicant above do not represent very special circumstances. Very Special Circumstances must be unique and exceptional conditions that can justify development in the Green Belt. Other than the statement that the business is failing, due to the lack lustre course structure and design defects, no quantifiable evidence has been presented to demonstrate that there is a need for this type of facility, or a viability assessment to compare the existing situation with any prospective position once the course is redeveloped. The applicant has also not provided any standards or design guidance to which an international Golf Course facility would be designed to, to ensure that the standards sought by the proposal would be met.
285. Further, as discussed within this report, in terms of the use of C,D&E waste there is no identified short fall in C,D &E waste management capacity offered by the proposal, it could therefore result in the diversion of a significant amount of material from existing consented facilities within the area contrary to Policy 7 of the SWLP 2020 and it is not justified under Policy 5 of the SWLP (2020) that the proposal will offer significant benefit to the land in this form or utilise the minimum quantity of material necessary, in order to protect the character of the area in which it is situated. Further, it has not been demonstrated through the assessment of alternatives that this is the most appropriate method for the improvements sought to the course. In this regard, whilst Officers recognise the intention of the NPPF (2024) in safeguarding existing businesses and recreational use, alongside Policy E6 of the GBLP 2015-2034, it is not adequately demonstrated within the submission that the proposal would be meeting a need for this type of facility in this location, which importantly respects the character of the area in its design and scale.
286. Officers recognise that although there may be some benefits from the provision of a state-of-the-art Golf Course with improved public access and enhanced biodiversity, improved flood performance, rainwater harvesting measures and an improved business model, as set out within the application documentation, significant concerns have been

raised by statutory consultees including the EA and LLFA and members of the public in proximity to the site, with regard to the assessment and delivery of these measures and the safeguarding of the existing and surrounding environment, which amount to substantial harms in the Green Belt and carry significant weight.

287. Taking the above into consideration, the applicant has failed to **clearly** demonstrate the site specific factors which would amount to VSC in this case. It is therefore Officers view from the circumstances presented above that these cannot be considered, either on their own or in combination, as being sufficiently very special to outweigh the overall harm to the Green Belt to justify the proposal.

Conclusion

288. The proposal subject of this application has been concluded to constitute inappropriate development within the Green Belt and by definition harmful to the Green Belt, failing to preserve the openness and is identified to result in minor conflict with the purpose of protecting the Green Belt. It could therefore only be permitted if very special circumstances existed to outweigh all and every harm caused.
289. For the reasons set out above, whilst it is acknowledged that the development would result in some benefits to the locality and existing business, Officers consider that, taking into account factors advanced by the applicant very special circumstances have not been demonstrated which **clearly** outweigh the harm to the Green Belt, by reason of inappropriateness and impact on openness, and any other harm. In terms of other harm, Officers have identified that this includes the applicant's failure to provide sufficient information to assess the impacts of the development on highways, traffic and access, landscape and visual impact, air quality, noise and flood risk and drainage. Officers therefore conclude that the application does not accord with Policy 9 of the SWLP 2020, and Policy P2 of the GBLP 2015-2034.

Human Rights and Equalities Implications

290. The Human Rights Act Guidance for Interpretation, contained in the Preamble to the Agenda is expressly incorporated into this report and must be read in conjunction with the following paragraph.
291. Objectors have raised issues relating to traffic, noise, drainage, flood risk, visual impact, ecology and biodiversity, air quality and contamination. It is the Officers view that the scale of the impact from these issues, which have been discussed in the report, could be significant. On the basis of the information and assessments provided in the application on these matters are not adequate to assess the scale of all potential impacts it is not possible to assess whether the impact is sufficient to engage Article 8 or Article 1 of Protocol 1.
292. Article 1 of Protocol 1 protects the Applicant's right to enjoyment of their property and he/she may claim that his/her human rights are affected if planning permission were to be refused. Officers do not consider this would constitute a breach given the need to balance the rights of the public in general against the applicant's. As such, to refuse planning permission would not interfere with any Convention right.
293. The Council is required by section 149 of the Equality Act 2010 to have due regard to the need to eliminate conduct prohibited by the act, advance equality of opportunity and foster good relations between people with protected characteristics and people who do not. The level of "due regard" considered sufficient in any particular context depends on the facts.

294. In this instance, the Council has considered its duty under the Equality Act 2010 and has concluded that this application does not give rise to any equalities considerations.
-

Conclusion

295. Planning permission is sought for the importation and deposit of some 369,038 cubic metres (m³) of inert waste material, alongside 58,753m³ of site derived soils (cut and fill) to remodel approximately 55ha of the existing Golf Course at Merrist Wood, comprising holes 1 to 18. The development would effectively amount to the construction of a new Golf Course facility (not including any buildings).
296. The proposal is considered inappropriate development in the Green Belt. In this regard, it is necessary to consider whether very special circumstances exist which **clearly outweigh** the harm to the Green Belt and any other harm resulting from the proposal. Issues relating to heritage, landscape and visual amenity, noise, dust, flooding and traffic have also been carefully considered.
297. With regard to the management of waste within the County, the proposal would result in the diversion of a significant volume of C,D & E waste material from existing consented facilities within proximity to the site, and it is not adequately demonstrated that the proposal will contribute to achieving the County's waste management targets. It is also not demonstrated that there is a beneficial need for the proposal, that cannot be met in any other way and that importantly the minimum volume of waste material necessary to achieve the proposal is proposed.
298. The construction phase of the proposal would result in 141 Heavy Goods Vehicle (HGV) movements per day, occurring between 9am and 3pm (6 hour period), over a 2-3 year period. The County Highway Authority has advised that the applicant has not provided sufficient information to adequately assess the implications of the development on the local highway network. In addition, the applicant has miscalculated through the underestimate of the number of trips likely to occur per hour and no information has been provided as to how the junction at Holly Lane on to Coombe Lane will be safely managed.
299. Further, two Grade II Listed buildings are situated either side of the access off Holly Lane into the site, which is shared with the Merrist Wood College. The County Historic Buildings Officer has raised concern regarding the impact on the identified heritage assets from the industrial nature of the lorry movements detracting from their rural and country estate setting. Representations received in response to the application have also raised significant concern regarding the impact of the proposal on the shared access and the other road users. Consequently, Officers cannot be certain that the proposed development would not have an unacceptable impact in respect of highway safety, traffic and access and on the historic environment contrary to the Development Plan policy.
300. The public, economic and environmental benefits of the scheme, including increased public access and enhanced habitat and recreational provision have not been clearly defined within the application and whilst claims are made sufficient detail is lacking in order to offer weight and support to these. As such the proposal is concluded to result in a *less than substantial harm* to the Grade II Listed Lodge House buildings, which is not clearly outweighed by the public benefits.
301. As set out within the report Officers have noted a number of inconsistencies in the application documentation, with regard to the volume of imported waste, the duration of the works and the number of vehicle movements. In addition, other technical consultees including the Environment Agency, the Lead Local Flood Authority, the County Landscape Architect, the County Geotechnical Consultant and the County Ecologist,

have advised that sufficient information has not been provided to enable a full assessment of the effects of the proposal, and if necessary, identify appropriate mitigation measures as to minimise or avoid any material adverse impact with regard to heritage, flood risk and drainage, ecology and biodiversity, landscape and visual impact, noise, air quality and contamination.

302. With regard to ecology and biodiversity, it is noted that all habitat and protected species survey work submitted in support of the application is now considered out of date and overall, there is insufficient detail to demonstrate the appropriate protection, mitigation and compensation measures for habitat and ecological receptors, including great crested newts and bats.
303. With respect to the implications of the development on the Green Belt, the development is inappropriate and by definition harmful to the Green Belt and does not preserve the openness and some conflict with the purpose of protecting land within the Green Belt is identified. Officers consider that it is not demonstrated that factors alone or in combination exist that amount to very special circumstances, which **clearly outweigh** the harm to the Green Belt, by reason of inappropriateness and loss of openness, and any other harm resulting from the proposal. As such the proposal does not comply with Development Plan policy in this regard.
304. Given the insufficient nature of the information submitted with the application, Officers cannot be certain that the proposed development would not have an unacceptable impact in relation to the highways, traffic and access, heritage, flood risk and drainage, landscape and visual amenity, air quality, noise, ecology and biodiversity, contamination and the Green Belt, and that planning conditions could mitigate or otherwise overcome the relevant harms. Officers also consider that the proposed development is unacceptable in the context of its location and does not accord with Development Plan policy in this regard.
305. In conclusion, although the principle of the development is not without its merits, for the reasons set out above the application does not comply with the Development Plan policy requirements and therefore permission for the proposed redevelopment of the Golf Course should be refused.

Recommendation

The recommendation is that planning permission be refused for the following reasons:

Reasons:

1. The proposed development is inappropriate and by definition harmful to the Green Belt. It is considered that very special circumstances do not exist to clearly outweigh the harm to the Green Belt, by reason of inappropriateness, and the other harm identified resulting from the proposal. The proposal is therefore contrary to Policy 9 of the Surrey Waste Local Plan 2020 and Policy P2 of the Guildford Borough Council Local Plan: Strategy and Sites (2015-2034).
2. The applicant has failed to provide sufficient information to support the application to demonstrate that the use of C,D & E waste as proposed contributes to achieving the recycling targets of the county, does not prejudice other consented waste facilities and will result in a significant benefit or improvement to the land, that the improvement cannot be practically and reasonably met in any other way and that the development involves the minimum quantity of waste necessary to enable the County Planning Authority to be satisfied that the proposal meets the requirements of the Development Plan Policy and therefore the proposal is contrary to Policies 1, 7 and 5 of the Surrey Waste Local Plan 2020.

3. The applicant has failed to provide sufficient information to support the application to enable a full assessment of the effects of the proposal, and where necessary, identify appropriate mitigation measures as to minimise or avoid any material adverse impact with regard to highway safety and not cause inconvenience to other road users, and enable the County Planning Authority to be satisfied that adequate safeguards can be secured for the protection and safety of the public highway. The proposal is therefore contrary to the requirements of Policies 14 and 15 of the Surrey Waste Local Plan 2020 and Policy ID3 Guildford Borough Council Local Plan: Strategy and Sites (2015-2034).
4. The proposed development would result in less than substantial harm to the Grade II listed Merrist Wood Lodge South and Merrist Wood Lodge North (Woodpecker Lodge), which is not clearly outweighed by the public benefits of the proposal. The proposal is therefore contrary to the requirements of the NPPF (2024), Policy 14 of the Surrey Waste Local Plan 2020, Policies D18 and D19 of the Guildford Borough Local Plan: Development Management Policies 2023 and Policy D3 of the Guildford Borough Council Local Plan: Strategy and Sites (2015-2034).
5. The applicant has failed to provide sufficient information to support the application to enable a full assessment of the effects of the proposal, and where necessary, identify appropriate mitigation measures as to minimise or avoid any material adverse impact with regard to the ability of the proposed development to control and manage flood risk and drainage, and enable the County Planning Authority to be satisfied that adequate safeguards can be secured for the protection of the environment as required by Development Plan Policy and therefore the proposal is contrary to the requirements of Policy 14 of the Surrey Waste Local Plan 2020 and Policies P10 and P11 of the Guildford Borough Local Plan: Development Management Policies 2023.
6. The applicant has failed to provide sufficient information to support the application to enable a full assessment of the effects of the proposal, and where necessary, identify appropriate mitigation measures as to minimise or avoid any material adverse impact with regard to the ecological features on the site and within proximity to the site, including maximising the biodiversity gains to be delivered by the development, and enable the County Planning Authority to be satisfied that adequate safeguards can be secured for the protection of the environment as required by Development Plan Policy and therefore the proposal is contrary to the requirements of Policy 14 of the Surrey Waste Local Plan 2020 and Policies P6 and P7 of the Guildford Borough Local Plan: Development Management Policies 2023.
7. The applicant has failed to provide sufficient information to support the application to enable a full assessment of the effects of the proposal, and where necessary, identify appropriate mitigation measures as to minimise or avoid any material adverse impact with regard to dust and vehicle emissions, and enable the County Planning Authority to be satisfied that adequate safeguards can be secured for the protection of the environment as required by Development Plan Policy and therefore the proposal is contrary to the requirements of Policy 14 of the Surrey Waste Local Plan 2020 and Policies D5 and P9 of the Guildford Borough Local Plan: Development Management Policies 2023.
8. The applicant has failed to provide sufficient information to support the application to enable a full assessment of the effects of the proposal, and where necessary, identify appropriate mitigation measures as to minimise or avoid any material adverse impact with regard to noise generated during the construction phase of the proposed development, and enable the County Planning Authority to be satisfied that adequate safeguards can be secured for the protection of the environment as required by Development Plan Policy and therefore the proposal is contrary to the requirements of Policy 14 of the Surrey Waste Local Plan 2020 and Policies D5 and D11 of the Guildford Borough Local Plan: Development Management Policies 2023.

9. The applicant has failed to provide sufficient information to support the application to enable a full assessment of the final landform of the proposal, and where necessary, identify appropriate mitigation measures as to minimise or avoid any material adverse impact with regard to landscape character and visual amenity, and enable the County Planning Authority to be satisfied that adequate safeguards can be secured to ensure the delivery of any mitigation proposed and for the protection of the environment as required by Development Plan Policy and therefore the proposal is contrary to the requirements of Policy 14 of the Surrey Waste Local Plan 2020 and Policy D1 of the Guildford Borough Local Plan: Strategy and Sites 2015-2034 and Policy D4 of the Guildford Borough Local Plan: Development Management Policies 2023.

Informatives:

1. In determining this application the County Planning Authority has worked positively and proactively with the applicant by assessing the proposals against relevant Development Plan policies and the National Planning Policy Framework including its associated planning practice guidance and European Regulations providing feedback to the applicant where appropriate. This approach has been in accordance with the requirements of paragraph 39 of the National Planning Policy Framework 2024. However, in this instance, it has not been possible to resolve the issues of concern so as to overcome the harm as identified in the reason(s) for refusal. The County Planning Authority has, however, set out/identified within its report, the steps/matters considered necessary to overcome the reason(s) for refusal which may lead to the submission of a more acceptable scheme in the future. The County Planning Authority is willing to offer pre-application advice in respect of any revised proposal.

Contact Katie Rayner

Tel. no. 07816 063202

Background papers

The deposited application documents and plans, including those amending or clarifying the proposal, and responses to consultations and representations received, as referred to in the report and included in the application file.

For this application, the deposited application documents and plans, are available to view on our [online register](#). The representations received are publicly available to view on the district/borough planning register.

The Guildford Borough Council planning register entry for this application can be found under application reference GU/24/CON/00011.

Other documents

The following were also referred to in the preparation of this report:

Government Guidance

[National Planning Policy Framework](#)

[Planning Practice Guidance](#)

The Development Plan

[Surrey Waste Local Plan 2020](#)

[Surrey Minerals Plan Core Strategy Development Plan Document \(DPD\) 2011](#)

Other Documents

Appeal Decision - Belview Golf Ltd v East Hertfordshire DC (2019)

Waste Management Plan for England 2021

National Planning Policy for Waste 2014

Waste Capacity Needs Assessment for the County dated 2023

Landscape Character Assessment: Guildford Borough dated April 2019

Department for Environment, Food and Rural Affairs, Sustainable Drainage Systems, Non-statutory technical standards for sustainable drainage systems, dated March 2015

Noise Policy Statement for England

Environmental Protection UK (EPUK)/Institute of Air Quality Management (IAQM) guidance 'Land-Use Planning and Development Control: Planning for Air Quality

Guidance on the Assessment of Mineral Dust Impacts for Planning dated May 2016 (v1.1)

Chartered Institute of Ecology and Environmental Management (CIEEM) on the lifespan of ecological reports and surveys dated April 2019.

Natural England and Forestry Commission Guidance – Ancient Woodland, ancient trees and veteran trees: advice for making planning decisions, dated 14 January 2022 A

This page is intentionally left blank