



**To:** Planning and Regulatory Committee  
**By:** Planning Development Manager  
**District(s)** Woking

**Date:** December 2024

**Electoral Division(s):**  
**Woking South**  
**Will Forster**  
**Woking South East**  
**Liz Bowes**  
**Case Officer:**  
**James Nolan**  
**Grid Ref:** 501466 157516

**Purpose:** For Decision

**Title:** Surrey County Council Proposal WO/PLAN/2024/0633

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## Summary Report

**Land at St John the Baptist School, Elmbridge Lane, Woking, Surrey GU22 9AL**

**Erection and use of a new Special Educational Needs classroom building and associated parking area, with access from Coniston Road.**

St John the Baptist School is located entirely within the Green Belt in the Kingfield area of Woking, with construction of the original school buildings understood to have begun in 1961. The school currently caters for children aged 11 to 18 years on a site which comprises the existing cluster of one- to three-storey school buildings and its adjacent vehicle parking and external hard play areas in the western half, as well as a large open field in the eastern half which is marked up for football and athletics uses. The site is surrounded by residential, educational and community uses and large areas of dense, established woodland.

The proposal the subject of this application is for the erection and use of a new Special Educational Needs (**SEN**) building for 30 pupils in the south-eastern corner of the site, an associated exclusive parking area with 37 spaces and access from Coniston Road, and perimeter landscaping and fencing.

Representations from a total of thirty five members of the public have been received by the County Planning Authority (**CPA**) in relation to this planning application. No technical objections have been received from the relevant consultees, subject to the application of suitably worded Conditions.

As the proposal lies within the Green Belt and is inappropriate development *very special circumstances* have to exist for planning permission to be granted, and those circumstances must outweigh all and any harm caused, including harm by virtue of inappropriateness. Officers consider that in this case the Applicant has demonstrated *very special circumstances* around the clear educational need for the proposal which, in accordance with the NPPF paragraph 99, should be given *great weight* in the planning balance.

The recommendation is to grant planning permission for application ref: **WO/PLAN/2024/0633** pursuant to Regulation 3 of The Town and Country Planning General Regulations 1992, subject to the recommended planning Conditions.

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## Application details

### Applicant

SCC Property

### Date application valid

27 August 2024

### Period for Determination

22 October 2024 – extended to 3 January 2025 on agreement with Agent.

### Amending Documents

- AFL120 LED Pole Mounted Luminaire data sheet – we-ef Fagerhult Lighting Ltd.
- Drawing No. PR-320-ATK-XX-XX-DR-E-60111 Rev P02 External Lighting Lux Level Assessment dated 12 September 2024.
- Email from Agent dated 25 October 2024 clarifying pitch layouts.
- Drawing No. PR-321-PEV-XX-XX-DR-A 00250 Rev D Proposed Site Plan – Athletics Track Layout dated 8 October 2024.
- Drawing No. PR-321-PEV-XX-XX-DR-A 00251 Rev D Proposed Site Plan – Proposed Reduced Rugby Union and Football pitches dated 9 October 2024.
- Drawing No. PR-321-PEV-XX-XX-DR-A 00252 Rev A Proposed Site Plan – Football and Rugby Pitch Layout dated 9 October 2024.
- Drawing No. PR-321-PEV-XX-XX-DR-A 00253 Rev A Proposed Site Plan – Football 11-a-side and mini soccer pitch layouts dated 9 October 2024.
- Drawing No. PR-321-PEV-XX-XX-DR-A 00254 Rev A Proposed Site Plan – 1 Football 11-a-side, 1 Reduced Rugby Union and 3 mini soccer pitch layouts dated 9 October 2024.
- Drawing No. PR-321-PEV-XX-00-DR-L-01200 Rev P5 Landscape Plan Works Stage Three dated 21 November 2024.
- Email from Agent dated 26 November 2024 containing the e3p document titled Biodiversity Metric Report version 5 dated 15 November 2024, the document titled The Statutory Biodiversity Metric version 4 dated 12 November 2024, and the e3p letter titled Ecology Response St John the Baptist School, Woking dated 15 November 2024.
- Email from Agent dated 3 December 2024 clarifying highway works on Woking Borough Council land.
- Email from Agent dated 4 December 2024 containing the Surrey County Archaeological Unit documents titled Written Scheme of Investigation for a Trial Trench Evaluation dated June 2024 and Archaeological Trial Trench Evaluation dated October 2024.

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## 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

Yes

38-58

Green Belt, Principle and Educational Need		
Impact on Playing Field Land	Yes	59-62
Design and Visual Amenity	Yes	63-78
Impact on Residential Amenity	Yes	79-107
Highways, Traffic and Access	Yes	108-133
Landscaping and Trees	Yes	134-151
Ecology and Biodiversity	Yes	152-166
Flood Risk and Drainage	Yes	167-182
Heritage	Yes	183-199
Waste Management Issues	Yes	200-206
Conclusions on Green Belt	Yes	207-212

## Illustrative material

### Site Plan

Plan 1 – Drawing No. PR-321-PEV-XX-XX-DR-A 00200 Rev G Proposed School Boundary Site Plan dated 28 May 2024.

Plan 2 – Drawing No. PR-321-PEV-XX-XX-DR-A 03000 Rev E Proposed External Elevations dated 28 May 2024.

Plan 3 – Drawing No. PR-321-PEV-XX-00-DR-L-01200 Rev P5 Landscape Works Plan Stage Three dated 21 November 2024.

### Aerial Photographs

Aerial 1

Aerial 2

## Background

### Site Description

1. St John the Baptist School is located towards north-western Surrey, within the Green Belt on the edge of the urban Kingfield area of Woking. It is approximately 325 metres (**m**) north-east of the A247 between Woking and Send, and roughly 1.18 kilometres (**km**) south-east of Woking railway station on the South West Main Line railway, at its closest points.
2. The 6.3 hectare (**ha**) school site is surrounded by Public Footpath No. 55 to its north and east, beyond which is a large area of established dense woodland and the Hoe Stream; Coniston Road to the south-east, beyond which is Derrys Field Allotments and a large number of residential properties; Woking College, Cardinals Community Football Centre, and a further area of established, dense, woodland to the south, which is protected by a Tree Preservation Order (**TPO**); and Elmbridge Lane to the west, beyond which is a large number of residential properties.
3. All pedestrian and vehicular access to the school site is currently gained from Elmbridge Lane, although a gated access exists in the south-eastern corner of the school site from Coniston Road, with a tarmacked track leading roughly halfway along the southern boundary. It is understood that this access and track are not currently in use by the school, however a right of access does exist over it and the access road does currently facilitate vehicular and footpath access to the adjacent allotments.

4. The school site currently comprises the existing cluster of one- to three-storey school buildings and its adjacent vehicle parking and external hard play areas in the western half, and a large open field in the eastern half which is marked up for football and athletics uses. A majority of the school site, including the entirety of the application site, lies within Flood Zone 2, designated by the Environment Agency as having a medium probability of flooding. The western part of the site which contains most of the existing buildings is within Flood Zone 1 and the very north-eastern corner of the large open field is within Flood Zone 3. It is understood that the school site slopes upwards towards its southern end.
5. The entirety of the school site lies within the Metropolitan Green Belt, while the eastern two-thirds, which mostly comprises the large open field, is within the River Wey (plus tributaries) Biodiversity Opportunity Area. The Hoe Stream Site of Nature Conservation Interest (**SNCI**) encompasses the Hoe Stream itself, which runs between 40 to 80m to the north and north-east of the school site, with the White Rose Lane Local Nature Reserve (**LNR**) being located on its northern side.
6. The school does not lie within an Air Quality Management Area (**AQMA**), with the closest being along the section of Guildford Road, Woking between Constitution Hill and Ashdown Close, some 940m north-west at its closest point.

### *Planning History*

7. It is understood that the main school buildings were originally constructed between 1961 and 1980 and consist of a curtain wall with blue infill panels at sill level and a feature white band of panelling. Planning permissions were granted by the CPA in November 2015 under ref: WO/2015/0945 and in April 2016 under ref: WO/2015/1431 for two-storey extensions to the existing sixth form block and adjacent humanities block respectively. The sports hall was completed in 2020 and the arts block was completed in 2022.
8. The school is a Roman Catholic mixed sex comprehensive Academy that currently caters for approximately 1,500 pupils aged 11 to 18 years old.

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### **The Proposal**

9. This application is submitted seeking planning permission for the erection and use of a new SEN building and associated parking area, with access from Coniston Road.
10. The application site covers an area of 0.47ha along the southern end of the wider school site, which currently comprises the tarmacked access road and part of the large open field used for outdoor recreation.
11. The application includes a new standalone, single-storey SEN building for 30 pupils, which would cover an area of 539 square metres adjacent to the existing arts block. The building would be timber clad with green/brown roof cladding and door surrounds, glazed aluminium windows and doors, and would include wall mounted lighting and roof mounted solar panels. External amenity spaces would be provided to the north, east and south of the building, with an aluminium privacy screen between the new building and the adjacent astroturf pitches at Woking College to the south.
12. This application also includes an associated parking area with 37 vehicle parking spaces and 10 bicycle parking spaces, with active and passive electric vehicle charging provision, a bin store, and floodlighting. Access would be gained from the existing, currently unused Coniston Road access, which would be for the sole use of the SEN building – the remainder of the school would continue to be accessed from Elmbridge Lane.

- 13. New tree and hedge planting would be undertaken, and both perimeter and internal fencing would be provided. This application does not include any works to the main school buildings.

**Consultations and publicity**

**Woking Borough Council**

- 14. Planning Control – No objection, subject to Conditions requiring the submission of details of the chosen units of air moving equipment, compressors, generators or plant and the submission of measures to acoustically insulate and ventilate the building for the containment of internally generated noise.
- 15. Environmental Health – No objection, subject to Conditions requiring the submission of a Dust Management Plan (**DMP**), detailing construction hours, and restricting the hours of use of the parking area.

**Consultees (Statutory and Non-Statutory)**

- 16. County air quality consultant – No objection.
- 17. County Arboriculturalist – No response received.
- 18. County Countryside Access Officer – No objection, subject to safe and unobstructed public access to the Public Footpath being provided at all times.
- 19. County Ecologist – No objection.
- 20. County Landscape Officer – No objection, subject to a Condition requiring the submission of a 30-year Landscape and Ecology Management Plan to secure the long-term maintenance and management of Biodiversity Net Gain.
- 21. County lighting consultant – No objection.
- 22. County noise consultant – No objection, subject to Conditions detailing construction hours and operational noise limits, and requiring the submission of a Construction Noise Management Plan (**CNMP**) and an Operational Noise Assessment.
- 23. Environment Agency – No comments to make.
- 24. Fairoaks Airport Safeguarding – No objection.
- 25. Lead Local Flood Authority – No objection.
- 26. Sport England – No objection.
- 27. Transport Development Planning – No objection, subject to Conditions.
- 28. UK Power Networks – No objection.

**Parish/Town Council and Amenity Groups**

- 29. None.

**Summary of publicity undertaken and key issues raised by public**

30. The application was publicised by the posting of two site notices and an advert was placed in the Woking News and Mail newspaper on 5 September 2024. A total of 44 owner/occupiers of neighbouring properties were directly notified by letter.
31. At the time of writing this report, thirty five letters of representation have been received by the CPA in relation to planning application ref: WO/PLAN/2024/0633, raising the following matters:
- Pleased to see SEN being taken seriously and improved. Desperate need for more SEN provision.
  - Minimal impact on traffic, positives far outweigh the negatives. Low number of pupils and staff is minor compared to the amount of traffic that travels along Elmbridge Lane/Howards Rd/Sundridge Rd, which are similar residential roads.
  - Currently many children have to travel long distances to access appropriate education, to the detriment of their wellbeing.
  - Does not accord with the provisions of the development plan.
  - Road layouts leading to Coniston Road are already busy with traffic and dangerous to all local road users now, without the extra traffic expected with parents using the proposed access road to drop-off and pick up their children from the new provision. Gloster Road gets so congested at school drop off and pick up times and usually takes around 20 minutes to get on to the main road; Rydens Way is very tight and has a number of turns with blind spots with only enough room for one car to pass at a time. How will this increased traffic be mitigated?
  - The plans proposed access for large delivery vehicles, Coniston Road is below the width target outlined in policy for this type of access. Rydens Way is not suitable for buses, which further compounds the safety concerns. The impact of increased traffic on safety has not been adequately considered.
  - Environmental impacts, being closely situated to the Hoe Stream, the Hoe Stream Site of Nature Conservation Interest, and the White Rose Lane Local Nature Reserve. Wildlife has already been impacted upon. Acceptance of the planning application as it stands would not be in line with Surrey CC [County Council] Environmental Policy. Development creates a barrier between the TPO woodland to the south and the White Rose Lane Nature Reserve to the north, breaking the link formed by the playing fields and fragmenting habitats by disrupting the passage of wildlife.
  - The impact of biodiversity should be fully reviewed, including an identification of and assessment of the impact on any protected species.
  - Query flood risk, as it is a flood area falling between the Hoe Stream and the Wey Navigation River. The more mature and semi-mature trees that are felled the greater the risk of flooding.
  - The analysis of the floodplain does not appear consistent with recent examples of flooding in the nature reserve and should be challenged; the impact of the access road on drainage for properties and land to the south should be reviewed.
  - Previous development has left a soil bund mounded around trees along eastern school boundary, which is already impacting their health.
  - Parking and access to/from Derry's Field allotments will be adversely affected; turning is often very difficult. It is unclear if the correct pre-notification requirements and steps have been taken to acquire the length of the allotment access track and future adoption of the private road to public highway.
  - The junction [of the car park and Coniston Road] does not provide suitable visibility along the remaining allotment access track and footpath 55, has poor visibility down Coniston Road, and removes 5-6 parking spaces for the allotment site which are regularly used. Further, the allotment access track width is not suitable for 2 way traffic.
  - Adverse impacts from noise, heavy plant movements, and construction traffic movements will affect public confidence and safety.
  - More traffic will increase noise having a negative effect on the local neighbourhood. The current level of tranquillity in the neighbourhood should be preserved.

- Heavy plant traffic during previous school development has left Coniston Road and the other access roads in a sad state of repair. The consequence of increased traffic also impacts on the quality of the road such as increase in pot holes/degradation of the road surface.
- Public footpath is well used, safety will be compromised by this development and access road. Its attraction as safe and enjoyable sustainable transport opportunity will be reduced.
- SJB [St John the Baptist School] already has an access that is sufficient, SJB has never had an entrance from Coniston Road, SEN building please go ahead but just use the entrance that already exists.
- The parking area associated with the new building is insufficient for the anticipated number of staff, visitors, and parents dropping off and picking up students. People will be encouraged to use Coniston Road as overflow parking and this is not acceptable – creates parking issues for people who live down these roads when we already have these issues on a daily basis; more vehicles dangerously parking along these roads will increase the risks to its users. In any case, parking availability is overstated and shown across established driveways.
- Parking/drop-off/pick-up at the new school via the Coniston Road access should have restrictions.
- There is concern that the proposed parking arrangements may not be suitable for buses or special transport vehicles often used for SEN students, causing additional traffic congestion.
- The increased traffic and speed of lorries and parents and staff will have a huge impact on the well being of residents.
- Access to the planned new building will not be used by SJB students – how will drop offs be managed/policed? How will the use of the parking and road be monitored going forward and how will this be communicated to our community?
- The site is also planning to be built on the Green Belt; how is this allowed?
- This area also suffers with light pollution and air quality already and this will have a big impact, especially the TPO protected woodland to the south. Particulate matter generated by demolition, earthworks and construction activities as well as exhaust emissions from HGVs and construction worker vehicles will be spread across the allotments by the prevailing winds contaminating crops, water tanks and reducing air quality.
- Post construction, the anticipated generation of extra vehicle movements plus engines idling will continue to have an impact on people tending to their allotments or using the footpaths as well as the residents of properties enroute. Proposed mitigation of spraying water to reduce dust levels could affect the water pressure available for both the allotments and surrounding residences at a critical point in the growing season.
- The current sewage infrastructure can't cope and there's risks of flooding. For the last 2 years we have had sewage tankers at the exact position of the proposed new access, they have at times stayed pumping night and day for several days.
- The woods and allotments are opposite the proposed access to SJB, vehicle access here will increase pollution within these areas.
- There has been insufficient consultation with the local community regarding this development.
- Alternative solutions have not been adequately explored/assessed. There are considerable opportunities elsewhere within the SJB site to provide the additional proposed floorspace and parking with a reduced impact; further as effectively proposed as a satellite site there must be significantly better served sites elsewhere within the NW quadrant.
- According to the SJB website, the school already provides SEN support for 275 students without requiring a separate building, car park and access.
- Data supplied in Need statement is contradictory – need for additional ASD-designated specialist units is higher in Runnymede and Surrey Heath than in Woking and proportion of Woking students having to travel for education is lower than in Surrey overall, so concentrating provision in Woking results in a higher quantity of ACI students being

disadvantaged by having to travel for education. Further, anticipated growth of Woking pupils requiring specialist school placement by 2028/29 is also lower.

- The educational need should be more strongly demonstrated for the specific use case proposed to support review against the detrimental impact of the development. Weak statement casts doubt on all 30 spaces being required.
- Concerned over there being alternate intentions behind the development beyond SEND usage as the site is regularly used for other purposes.
- How do we know going forward more buildings won't be added to the unit, and more parking?
- Impact of the design and visual amenity of the existing site and the surrounding area – loss of openness changing the character of the landscape and reducing its amenity value.
- Loss of playing field space – amount being sacrificed is disproportionate and extends the built form of the school into open areas of the site.
- Impact on residential amenity.
- Contamination of agricultural land.
- Does not deliver SCC's [Surrey County Council's] strategic priority for all children to attend a school local to them.
- There will be access between the main school and the new SEN unit via a pathway between the Multi Use Games Area and the Art Block – it is difficult to see how this is justified.
- The application does not consider the BOA [Biodiversity Opportunity Area].
- The location of the SEND unit is very close to the existing football pitch at Woking College with the noise a potential difficulty for noise sensitive students.
- The unit is segregated functionally from the main school, this is unaligned to SCC proposals on inclusivity by limiting visibility of SEND students and separating them from their peers. The proposed segregation reduces the benefit of a dedicated unit within a mainstream school.
- The bin store is in an area with poor access and close to residential properties.
- Split site access for emergency vehicles increases the risk of vehicles being sent to the wrong location in the event of an emergency.

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### Planning considerations

32. 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.
33. In this case the statutory development plan for consideration of the application consists of the Woking Core Strategy 2012 (**WCS2012**) and the Woking Development Management Policies Development Plan Document 2016 (**WDM2016**), as well as the Surrey Waste Local Plan Part 1 – Policies and Part 2 – Sites, which together form the Surrey Waste Local Plan 2019 to 2033 (**SWLP**).
34. The WCS2012 sets out the overall approach and a clear vision to managing development and change in the borough of Woking up until 2027, and the means to achieve that. It responds to the key issues that residents, businesses and visitors have said they want to be addressed and sets out a robust defence for the protection of the physical and natural environment and the heritage assets of the borough.
35. The WDMP2016 contains detailed policies to help determine day-to-day planning applications and is designed to help achieve the comprehensive delivery of the WCS2012 in a sustainable and expeditious manner.
36. Further, Hoe Valley Neighbourhood Forum covers the areas of Kingfield, Old Woking and Westfield and is in the process of creating the Hoe Valley Neighbourhood Plan. It is



understood that this Plan is currently at the early stages of being drafted, with consultations being conducted and evidence being gathered, and Officers therefore do not consider it is sufficiently advanced for any weight to be attached to it for the purposes of determining this planning application.

37. In considering this application the acceptability of the proposed development will be assessed against relevant development plan policies and material considerations. In this case the main planning considerations are Green Belt, principle and educational need; impact on playing field land; design and visual amenity; impact on residential amenity; highways, traffic and access; landscaping and trees; ecology and biodiversity; flood risk and drainage; heritage; and waste management issues.

## **GREEN BELT, PRINCIPLE AND EDUCATIONAL NEED**

### **Woking Core Strategy 2012**

Policy CS6 – Green Belt

Policy CS16 – Infrastructure delivery

### **Woking Development Management Policies Development Plan Document 2016**

Policy DM13 – Buildings in and adjacent to the Green Belt

Policy DM21 – Education facilities

#### *Green Belt*

38. National Planning Policy Framework December 2023 (**NPPF**) paragraph 142 states the great importance of Green Belts in preventing urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
39. NPPF paragraph 143 states that Green Belt serves five purposes:
- a) To check the unrestricted sprawl of large built-up areas.
  - b) To prevent neighbouring towns merging into one another.
  - c) To assist in safeguarding the countryside from encroachment.
  - d) To preserve the setting and special character of historic towns; and
  - e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
40. NPPF paragraph 152 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
41. NPPF paragraph 153 states that when considering any planning application, planning authorities should ensure that substantial weight is given to any harm to the Green Belt. *Very special circumstances* will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
42. NPPF paragraph 154 states that a planning authority should regard the construction of new buildings as inappropriate in the Green Belt. An exception to this is limited infilling or the partial or complete redevelopment of previously developed land (**PDL**), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development.
43. Annex 2 of the NPPF defines PDL as land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.

### *Inappropriate Development*

44. The application site is located in the Green Belt where there is a general presumption against inappropriate development.
45. The proposed development would not contribute to the unrestricted sprawl of a large built-up area, the merging of neighbouring towns, or encroachment into the countryside, and would not affect the setting and special character of a historic town.
46. However, the proposed development involves the construction of a new building, and the application site does not constitute PDL as it is not currently, and has not previously been, occupied by a permanent structure. The proposed development is therefore inappropriate, and the Applicant has recognised this.
47. Inappropriate development may only be permitted where very special circumstances are judged to clearly outweigh the harm caused by inappropriateness, and any other harm. Where there is harm to the Green Belt, the Applicant will need to demonstrate that *very special circumstances* exist in order to justify the grant of planning permission. *These very special circumstances* will need to outweigh the harm caused by virtue of the proposal's inappropriateness as well as any other harm which will be identified and discussed throughout the following report and summarised in the final section CONCLUSIONS ON GREEN BELT.

### *Educational Need*

48. NPPF paragraph 99 states that it is important that a sufficient choice of school places is available to meet the needs of existing communities. Planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should give great weight to the need to create, expand or alter schools through decisions on applications.
49. NPPF paragraphs 123 and 124 state that planning decisions should promote an effective use of land in meeting the need for other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Planning decisions should:
  - a) Encourage multiple benefits from urban land, including through taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation.
  - b) 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
  - d) Promote and support the development of under-utilised land and buildings.
50. NPPF paragraph 128 states that planning decisions should support development that makes efficient use of land, taking into account:
  - a) The identified need for other forms of development, and the availability of land suitable for accommodating it.
  - b) Local market conditions and viability.
  - c) The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use.
  - d) The desirability of maintaining an area's prevailing character and setting, or of promoting regeneration and change; and
  - e) The importance of securing well-designed and beautiful, attractive and healthy places.

51. Surrey County Council as the Education Authority has a legal duty to manage its state-maintained specialist education estate efficiently to avoid detriment to schools' educational offers, creating disadvantage to children and young people who have distinct types of additional needs and disabilities in different geographical areas, or the local authority's financial position.
52. The Applicant has submitted a detailed Education Justification Statement and Needs Analysis in support of this proposal which highlights issues that already exist for autistic pupils and pupils with communication and interaction needs resident in Woking who need a specialist school placement.
53. Surrey has seen significant growth in the number of autistic children and young people aged 4-19 years with additional needs and disabilities, with an identified long-term sufficiency gap in additional specialist school places for this cohort in Woking and north-west Surrey. This means that a high proportion of children with additional needs and disabilities who live in Woking and the surrounding areas currently have to travel long distances outside of the district and north-west quadrant of the county in order to attend specialist provision that can successfully meet their needs.
54. Further, forecasts of pupil numbers indicate that these issues will continue to apply for the near future and are likely to worsen unless action is taken, with demand increasing in the next five years and beyond. It is anticipated that by 2027/28, there will be around 247 additional pupils with these needs living in the north-west quadrant, of which around 94 will be resident in Woking.
55. The Applicant has stated that the proposed development would allow for the provision of education to 30 students aged 11-16 with special educational needs in a bespoke and suitable building, within the grounds of an existing school. This would provide residents within the local and surrounding area who have autistic children with closer access to high quality, specialist school provision which dramatically reduces school journey times.
56. In response to a consultation request, Woking Borough Council (**WBC**) raised no objection in relation to the principle of the proposed development.
57. Taking all of the above into account, Officers consider that the Applicant has demonstrated a clear need for the proposed SEN building to meet both the current and anticipated future needs of the local community and recognise that great weight should be placed on the need to expand existing schools.
58. Officers conclude that great weight can be given to the educational need for the proposed development, and this can be considered in the planning balance as part of the *very special circumstances* which need to exist and which override all and any harm to the Green Belt. The following sections of the report will discuss any other areas of harm, and the final section of the report sets out the conclusions of Officers in this regard.

## **IMPACT ON PLAYING FIELD LAND**

### **Woking Core Strategy 2012**

Policy CS17 – Open space, green infrastructure, sport and recreation

59. NPPF paragraph 103 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements.

60. The proposed SEN building would be positioned on land which currently comprises part of the large open field used by the wider school for outdoor recreation. However, the Applicant has submitted drawings to demonstrate that this field could still be used as at present by moving existing pitch layouts slightly further northwards.
61. Sport England raise no objection to the proposal as the Applicant has satisfactorily demonstrated that it could be accommodated without compromising the ability of the fields to be used as at present.
62. Officers therefore conclude that the proposal is acceptable in this regard.

## **DESIGN AND VISUAL AMENITY**

### **Woking Core Strategy 2012**

Policy CS21 – Design

Policy CS22 – Sustainable construction

Policy CS24 – Woking's landscape and townscape

63. NPPF paragraph 135 states that planning decisions should ensure that developments:
- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.
  - b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
  - c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.
  - d) Establish or maintain a strong sense of place, using the arrangement of spaces, building types and materials to create attractive, welcoming and distinctive places to work and visit.
  - e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
  - f) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
64. NPPF paragraph 139 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:
- a) Development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
  - b) Outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
65. NPPF paragraph 162 states that in determining planning applications, planning authorities should expect new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
66. The proposed SEN building would measure approximately 27.32m by 20.972m, reaching a height of 3.685m to the roof level, and would accommodate three classrooms as well as

separate learning spaces, staff and amenity areas, and toilets, in accordance with Building Bulletin 104 requirements. It would also feature three circular skylights at its centre to allow abundant natural daylight into the interior, while the aforementioned roof mounted solar panels would generate over 110% of the energy use of the proposed building.

67. As previously stated, the proposed building would be timber clad, which would aid in visually merging it with the adjacent wooded context of protected trees and help soften its appearance.
68. The proposed building would be immediately surrounded on its northern, western and southern sides by private hard informal social spaces, while a semi-private hard informal space to the east would provide an external reception area for parents and visitors. All of these spaces would be partially covered with canopies, pergolas and other structures to provide shading for pupils.
69. The aforementioned bin store would measure 2.3m by 3m, reaching a height of less than 3m, would be timber clad with a dark grey bitumen roof, and would be positioned at the entrance to the proposed development from Coniston Road for ease of access. Cycle parking would comprise covered 'Sheffield' style stands, which would be positioned adjacent to the proposed SEN building entrance. The associated car park and pavements would be tarmacked.
70. Internal and perimeter fencing would comprise largely 1.5m, 2m and 3m high weld-mesh fencing, although there would be a small amount of 1.5m and 2m solid timber fencing in the immediate vicinity of the proposed SEN building to separate the eastern and southern private hard informal social spaces. Decorative aluminium panel fencing is also proposed along the southern boundary of the southern informal space to provide privacy from the adjacent football centre.
71. Further, the positioning of the proposed building adjacent to the aforementioned, recently completed, single-storey arts block, which measures some 4.7m in height, would mean it would be well-related to both its neighbouring development and the existing cluster of school buildings immediately beyond.
72. In response to a consultation request, WBC raised no objection in relation to the design of the proposed development or visual amenity.

#### *Officer Assessment*

73. Officers recognise that the proposed development would bring the built form associated with the wider school closer to the residential properties along Coniston Road, and that visual amenity impacts would arise from such positioning.
74. However, Officers also recognise that the proposed development would be situated within the existing school grounds, in close proximity to the existing cluster of school buildings, and that views of the building from the surrounding area would be limited by the established area of dense woodland to its south and south-east.
75. Further, Officers consider that the scale, heights, proportions and materials of the proposed development would be respectful and sympathetic to the character of the surrounding educational, residential and natural environments, while being appropriately designed for its intended purpose.
76. In any case, Officers recognise that these factors are dictated to a certain extent by both the constraints of the wider school site and educational requirements, and are important to the efficient functioning of the proposed development. Officers also recognise that the proposed

development would incorporate provision for the storage and collection of waste and for the generation of renewable energy.

77. Officers consider that Conditions should be applied to any permission granted to ensure complimentary materials would be used on the proposed SEN building and that the proposed solar panels are installed.

78. Subject to the application of these Conditions, Officers consider development plan policy requirements in relation to design and visual amenity are satisfied.

## **IMPACT ON RESIDENTIAL AMENITY**

### **Woking Development Management Policies Development Plan Document 2016**

Policy DM5 – Environmental pollution

Policy DM6 – Air and water quality

Policy DM7 – Noise and light pollution

Policy DM21 – Education facilities

79. NPPF paragraph 180 states that planning decisions should contribute to and enhance the natural and local environment by 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 quality, taking into account relevant information.

80. NPPF paragraph 191 states that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) 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 the quality of life; and
- c) Limit the impact of light pollution from artificial light on local amenity and nature conservation.

81. NPPF paragraph 193 states that planning decisions should ensure that new development can be integrated effectively with existing businesses and community facilities. Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development in its vicinity, the Applicant should be required to provide suitable mitigation before the development has been completed.

82. NPPF paragraph 194 states that the focus of planning 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). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

### *Overlooking/loss of outlook*

83. The proposed new building will not have any impact on existing residential dwellings as it is sited some distance away.

### *Air Quality and Dust*

84. Paragraphs 005, 006, 007 and 008 of the Planning Practice Guidance (**PPG**) titled Air quality respectively state the relevance of air quality to a planning decision, considerations in determining planning applications, the contents of proportionate air quality assessments, and proportionate mitigation options.
85. The Applicant has recognised air quality impacts would arise from the construction phase of the proposed development, including potential increases in concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>, and has therefore undertaken an air quality assessment in this regard.
86. This assessment begins by identifying the existing air quality conditions in the vicinity of the application site and the construction activities likely to generate dust and particulate matter, including the removal of the old concrete access road, earthworks, construction of the proposed SEN building, HGV trackout, and exhaust emissions from construction vehicles and plant.
87. The assessment continues that emissions from these activities are likely to be small and would present low risk to human health through good practice and mitigation such as implementing a DMP and wheel cleaning regime, erecting screens/barriers around dust emitting activities, using a dust sweeper on local roads, daily on- and off-site inspections, and a complaints log.
88. In response to a consultation request, WBC Environmental Health raised no objection, recommending a Condition requiring the submission of the above-mentioned DMP.
89. The County air quality and dust consultant similarly raised no objection.

### *Noise and disturbance*

90. Paragraphs 003, 004 and 006 of the PPG titled Noise respectively state the importance of considering the acoustic environment, detail the observed noise effect levels, and detail factors to consider when assessing noise impacts.
91. With regards to operational noise, the Applicant has recognised that the proposed development would result in noise emissions from plant, including from a proposed mechanical ventilation system, and has therefore undertaken a noise assessment.
92. This assessment includes a baseline survey to measure typical day- and night-time background noise levels in the vicinity of the proposed SEN building and identifies the need to implement mitigation as part of the proposed development, including controlling noise emissions from the aforementioned ventilation plant and using internal fittings and materials with a high level of acoustic absorption.
93. In response to a consultation request, the County noise consultant (**CNC**) recognised that measured noise levels are low and any adverse effects could be avoided through typical mitigation measures, therefore stating that they have no major concerns in terms of noise.
94. However, the CNC thereafter recommended Conditions be applied to any permission granted, including restrictions on construction hours and operational noise, and requiring the submission of a CNMP and an operational noise assessment.
95. WBC raised no objection but recommended Conditions requiring the submission of details of fixed plant and equipment associated with air movement, such as compressors, generators and other similar plant and equipment, prior to their installation; and the submission of

measures to acoustically insulate and ventilate the proposed SEN building for the containment of internally generated noise.

96. The WBC Environmental Health team recommended Conditions restricting construction hours and the hours of use of the parking area.
97. The introduction of vehicle movements on this part of the school site will have implications in respect of noise disturbance to dwellings in Coniston Road and particularly No 47 which has a side boundary adjacent to the proposed internal access and parking area. However, any disturbance which does occur will be confined to very short periods during the morning and the afternoon and would be similar to many existing locations adjacent to traffic generating uses. Conditions relating to the hours of use of the parking as suggested by the WBC Environmental Health team above are considered to be reasonable and necessary to control this harm to an acceptable level. A further Condition requested by the County Highway Authority will restrict the use of the car park to the SEN unit only.

### *Lighting*

98. Paragraphs 001, 003, 004, 005 and 006 of the PPG titled Light pollution respectively state the importance of considering artificial lighting, how to avoid light spill, how to minimise light pollution, how to assess lighting needs and reduce glare, and how to reduce lighting impacts on wildlife.
99. Lighting incorporated within the proposed development would include nine luminaires attached to 6m-high columns within the vehicle parking area and one attached to a 4m-high column adjacent to the bin store.
100. These luminaires would be controlled by photo electric sensors and an override clock to ensure illumination is used only when required. They would be angled down, and the Applicant has stated they would also consider the use of shields, baffles and louvres to further reduce obtrusive light and glare emissions to surrounding areas.
101. Other proposed lighting includes wall mounted lighting around the SEN building to provide general access and emergency lighting requirements, and low-level uplighters at the parking area entrance to illuminate signage.
102. In response to a consultation request, the County lighting consultant raised no objection.

### *Officer Assessment*

103. With regards to air quality and dust, Officers recognise that the application site is not within an AQMA and note the proposed mitigation measures. Officers consider a Condition should be applied to any permission granted to ensure these measures are implemented as appropriate, including the submission of the proposed DMP.
104. With regards to noise, Officers recognise that construction-related emissions would be temporary and short-lived but consider there is still a need to ensure no significantly adverse impacts on residential amenity would arise during this time. Therefore, Officers agree with the CNC and WBC Environmental Health team that Conditions should be applied to any permission granted to restrict construction hours and require the submission of a CNMP.
105. Similarly, there is a need to ensure no significantly adverse impacts once the proposed SEN building is operational, and Officers therefore agree that the other CNC recommended Conditions, as well as the Conditions recommended by WBC and the WBC Environmental Health team, should be applied.



106. With regards to lighting, Officers note the proposed mitigation measures and consider that a Condition should be applied to any permission granted to ensure these measures are implemented as appropriate.

107. Therefore, subject to the application of the above-mentioned Conditions, Officers consider development plan policy requirements in relation to impact on residential amenity are fulfilled and the proposal will not give rise to harm to residential amenity subject to planning conditions.

## **HIGHWAYS, TRAFFIC AND ACCESS**

### **Woking Core Strategy 2012**

Policy CS18 – Transport and accessibility

### **Woking Development Management Policies Development Plan Document 2016**

Policy DM21 – Education facilities

108. NPPF paragraph 108 states that transport issues should be considered from the earliest stages of development proposals, so that:

- a) The potential impacts of development on transport networks can be addressed.
- b) Opportunities from existing transport infrastructure, and changing transport technology and usage, are realised – for example, in relation to the scale, location or density of development that can be accommodated.
- c) Opportunities to promote walking, cycling and public transport use are identified and pursued.
- d) The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

109. NPPF paragraph 114 states that in assessing specific applications for development, it should be ensured that:

- a) Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location.
- b) Safe and suitable access to the site can be achieved for all users.
- c) The design of streets, parking areas, and other transport elements reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- d) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

110. NPPF paragraphs 115 and 116 state that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Within this context, applications for development should:

- a) Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.
- b) Address the needs of people with disabilities and reduced mobility in relation to all modes of transport.

- c) Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.
- d) Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

111. NPPF paragraph 117 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

### *Construction*

112. The Applicant has submitted a draft Construction Traffic Management Plan (**CTMP**) as part of this application, which details that construction of the proposed development is anticipated to take around 31 weeks in total.
113. Construction vehicles would approach from and leave towards the south, using the A247, Gloster Road, Rydens Way and Coniston Road, entering the application site via the existing south-eastern gates. All vehicles would enter and leave in forward gear and parking on the public highway would not be permitted.
114. Construction would take place between 8am and 6pm Mondays to Fridays and 8am and 1pm on Saturdays, with no construction taking place on Sundays. No construction vehicle movements would be permitted during the morning and afternoon peaks.
115. Average daily construction movements would total 1-2 and would operate in accordance with a delivery schedule and traffic marshall. Parking for construction staff vehicles would be provided on-site, with no parking allowed on the public highway. A wheel wash would also be provided and lorries removing materials from the application site would be fully sheeted.
116. The Applicant has carried out a pre-development highway condition survey along the proposed construction vehicle route as part of the submitted CTMP and has committed to also undertaking a post-construction survey.

### *Operation*

117. The proposed development includes formalising the currently unused access in the south-eastern corner of the school site from Coniston Road, by creating a new bellmouth across the existing pavement. This new access would provide both a vehicular roadway and pedestrian footpath, linking the proposed development to both Coniston Road and Public Footpath No. 55.
118. The access would be exclusively for the proposed SEN building, with all other school-related traffic continuing to use the Elmbridge Lane entrance as at present. This arrangement would be controlled via secure gates linked to the SEN building's reception.
119. On-site parking would include 20 staff spaces, 14 pupil drop-off bays, and 3 disabled spaces, with 50% of the staff spaces being provided with active electric charging provision and the remaining 50% being provided with passive facilities. Provision is deemed sufficient for the average number of staff expected to be present at any time, and the Applicant has stated there is adequate capacity for parking on surrounding roads should the need arise, with no restrictions being in place on Coniston Road.

120. The parking area would also include a mini-bus pick-up and drop-off area and would have sufficient space for delivery and service vehicles. It would not be used to accommodate any community or other use outside of school operational hours, and the Applicant has stated they would accept a Condition limiting the hours of use in order to enforce this.
121. At full occupation, it is anticipated that there would be a maximum of 130 one-way vehicle movements in an average day, comprising 38 staff and 92 pupil trips. Pupil movements would be evenly split between the morning and afternoon peaks, with staff movements being staggered respectively before and after these peaks.
122. The Applicant has provided survey data to demonstrate that the application site has good accessibility for walking, cycling and public transport, and that local roads from which the proposed development would be accessed have capacity for the associated additional traffic.
123. Due to the nature of the proposal, it has been assumed that all pupils would arrive by private transport. However, 10 covered cycles spaces would be provided adjacent to the entrance to the proposed SEN building, including 2 spaces for adapted cycles.
124. In response to a consultation request, the County Transport Development Planning (TDP) team raised no objection, subject to several Conditions relating to the creation of an appropriate access with sightlines, vehicle and bicycle parking including EV charging, restriction on use of car park for the SEN unit only, CTMP, parking management plan and travel plan.
125. The County Countryside Access Officers also raised no objection, reminding the Applicant that safe and unobstructed public access to Public Footpath No. 55 is to be maintained at all times.

#### *Officer Assessment*

126. The Applicant has assessed the impact of the proposed development on the highway network during both the construction and operation phases.
127. However, the submitted CTMP is draft and an updated document will be required to finalise some of the arrangements indicated within it. Officers therefore agree with the recommendation of the TDP team that a Condition should be applied to any permission granted requiring the submission of a finalised CTMP, to ensure the impact of construction is fully assessed and to sufficiently demonstrate that safe and suitable access would be possible during this phase.
128. The Applicant has also proposed measures to mitigate significant impacts on the public highway, including the use of a wheel wash, traffic marshall, and delivery schedule during construction.
129. Officers consider the aforementioned Condition controlling the hours of construction would further aid in mitigating significant impacts, although it should include the aforementioned restriction on movements during peak times. The aforementioned Condition controlling the hours of use of the vehicle parking area once operational would also aid in this respect, as would a Condition requiring a post-condition highway survey.
130. Conditions recommended by the TDP team requiring that construction of the new access and the laying out of parking, drop-off and turning space are completed prior to the first occupation of the SEN building, and limiting the use of the vehicle parking area only to users of the building once it is operational, should also be applied.

131. While details of on-site vehicle parking with provision for disabled users and service, emergency and electric vehicles have been submitted, Officers agree that the Conditions recommended by the TDP team requiring an updated CPMP and the submission and implementation of a scheme to provide electric vehicle charging infrastructure should be applied to any permission granted to ensure that finalised parking management details are provided and to ensure the delivery of charging infrastructure.
132. Finally, taking the nature of the proposal into account, Officers consider the Applicant has proposed an appropriate amount of cycle parking for the proposed development. The Condition recommended by the TDP team requiring the submission and implementation of a scheme to provide such parking prior to the first occupation of the development should be applied to any permission granted.
133. Taking all of the above into account, Officers consider that subject to the application of all of these Conditions, development plan policy requirements in relation to highways, traffic and access are fulfilled.

## **LANDSCAPING AND TREES**

### **Woking Core Strategy 2012**

Policy CS24 – Woking’s landscape and townscape

### **Woking Development Management Policies Development Plan Document 2016**

Policy DM1 – Green Infrastructure Opportunities

Policy DM2 – Trees and landscaping

134. NPPF paragraph 136 states that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments, that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.
135. NPPF paragraph 180 states that planning decisions should contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and ecosystems services – including the economic and other benefits of trees and woodland.
136. Paragraphs 001 and 137 of the PPG titled Tree Preservation Orders and trees in conservation areas respectively state the prohibitions of and offences in relation to trees covered by a TPO.
137. Surrey Landscape Character Assessment: Woking Borough dated April 2015 identifies the application site as lying within Landscape Character Area (**LCA**) RF7 Lower Wey River Floodplain, which is defined as encompassing flat, low lying, largely pastoral floodplain land, which is dominated by the River Wey with very sparse settlement and little road access overall. LCA RF7 covers a large area stretching on either side of the River Wey from north Guildford to north-west Weybridge via the urban areas of Old Woking, Pyrford, Wisley, Byfleet, the Brooklands industrial estate and Addlestone. As well as the application site, the LCA covers the entirety of the St John the Baptist School playing fields, the Cardinals Community Football Centre to the south, and Derrys Field Allotments to the east, and is surrounded by urban residential, educational and community development at this point.
138. Officers consider that given the proposed development is within an existing school site and is for the same use, it does not contradict the strategy of this designation which is to conserve the rural, secluded areas of landscape with its river channels, pastures, wetlands and woodland, along with historic infrastructure and buildings associated with the Wey

Navigation and the Wey and Arun Canal, and resist further development within the Thames and Blackwater floodplains.

139. The dense wooded area to the south of the application site comprises mostly category A trees, although there is one category B tree in the far south-eastern corner closest to the existing access point. This area provides a barrier to Cardinals Community Football Centre to the south and the residential properties to the south-east. There is a further category A tree immediately to the north of the existing access point.
140. The Applicant has stated that some work to facilitate the new access and parking area would be required within the root protection area (**RPA**) of these trees, but that these RPAs are already covered with hardstanding and in any case the work could be completed without causing significant impact through the adoption of appropriate working practices. Access facilitation pruning of the canopies of the trees to the south which overhang the application site would also be required.
141. Details of these working practices have been submitted by the Applicant within an Arboricultural Method Statement (**AMS**), which include a commitment to site meetings prior to each phase of the proposed development, installation of protective barriers around retained trees and their roots, use of temporary ground protection measures during construction, and compliance with British Standard recommendations.
142. Extensive new planting has been included within the proposed development to provide screening from the playing fields and soften the visual impact of vehicle parking. This includes shrub and herbaceous planting, mixed native buffer planting, and trees to the north and east of the proposed SEN building, as well as 1.5m and 2m high evergreen hedges to its east between the building and vehicle parking area.
143. There would be several trees and mixed native buffer planting along the northern length of the vehicle parking area, including around the proposed bin store, with an area of wildflower/grass meadow grass alongside a majority of this length. There would also be mixed native buffer planting along the entire southern length of the vehicle parking area, with two trees and a small amount of shrub and herbaceous planting adjacent to the entrance to the facility from Coniston Road.
144. The Applicant has stated that all planting and hedgerows have been designed to fully integrate the proposed SEN building and associated parking area into the landscape and neighbouring cluster of TPO trees that feature to the south.
145. Details for the implementation and general maintenance of the proposed new planting has also been submitted by the Applicant, with a proposed maintenance period of 20 years.
146. In response to a consultation request, the County Landscape Officer (**CLO**) raised no objection, recommending that a Condition should be applied to any permission granted requiring adherence to the submitted AMS and that the planting maintenance period should be extended to 30 years.
147. The County Arboriculturalist was also consulted, but no response was received.

#### *Officer Assessment*

148. Officers recognise that all existing trees and landscape features would be retained as part of the proposed development and that subject to the application of a Condition requiring adherence to the submitted AMS, appropriate measures would be put in place to ensure their protection during construction.

149. Further, Officers recognise that new tree, hedgerow and native planting would be incorporated as part of the proposed development, with an appropriate maintenance schedule presented by the Applicant. Officers consider that a Condition should be applied to any permission granted to ensure the implementation of this schedule.
150. Although no consultation response was received from the County Arboriculturalist, the CLO is satisfied with the information submitted.
151. Taking all of the above into account and subject to the application of the above-mentioned Conditions, Officers consider development plan policy requirements in relation to landscaping and trees are fulfilled.

## **ECOLOGY AND BIODIVERSITY**

### **Woking Core Strategy 2012**

Policy CS7 – Biodiversity and nature conservation

Policy CS22 – Sustainable construction

152. NPPF paragraph 180 states that planning decisions should contribute to and enhance the natural and local environment by:
- a) Protecting and enhancing sites of biodiversity (in a manner commensurate with their statutory status or identified quality in the development plan).
  - d) Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
153. NPPF paragraph 186 states that when determining planning applications, planning authorities should apply the following principles:
- a) If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
  - d) Opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity.
154. Paragraph 001 of the PPG titled Biodiversity Net Gain states that Biodiversity Net Gain (**BNG**) is a way of creating and improving biodiversity by requiring development to have a positioned impact on biodiversity. In England, BNG is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021 and amended by the Levelling Up and Regeneration Act 2023) under which, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the Condition that the biodiversity gain objective is met. This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development value of the on-site habitat. This increase can be achieved through on-site gains, registered off-site gains or statutory biodiversity credits.

The biodiversity gain Condition is a pre-commencement Condition: once planning permission has been granted, a Biodiversity Gain Plan must be submitted and approved by the planning authority before commencement of the development.

### *Ecology*

155. The Applicant has stated that the application site and wider school grounds comprise predominantly buildings, hardstanding, amenity grassland, and poor semi-improved grassland, and therefore hold little ecological value.

156. However, the application site and wider school grounds also comprise areas of dense scrub, tall ruderal, trees, hedgerows and broadleaved woodland, with large areas of dense woodland being located beyond the school site to the north, north-east and south. There is also the nearby Hoe Steam SNCI and White Rose Lane LNR.
157. The Applicant has therefore submitted a Preliminary Ecological Appraisal, detailing a walkover survey in which searches of the wider school site were made for uncommon, rare and statutorily protected plant species; species which are indicators of important or uncommon plant communities; invasive species; and signs of badgers, and the suitability of the site to support amphibians, reptiles, water vole and otter, bats, bird species and invertebrates was assessed.
158. On-site buildings were found to have potential for the roosting of bats and for hosting common and notable bird species, while amenity grassland, tall ruderal, poor semi-improved grassland, dense scrub, broadleaved woodland, trees, hedgerow, and introduced shrub were found to provide some value for foraging and commuting bats, foraging badgers, foraging and hibernating hedgehogs, reptiles and invertebrates.
159. No further bat surveys were recommended as the proposed development does not involve the buildings where bat roosting potential was identified. However, an updated site walkover was recommended prior to the commencement of development to identify any new badger setts.
160. Other mitigation proposed during construction includes turning off plant when not in use, no lighting to face the designated sites, any amphibians encountered to be moved by hand, and careful vegetation clearance. Post-construction, the installation of bird and bat boxes and bug hotels is recommended.
161. In response to a consultation request, the County Ecologist is satisfied with the Applicant's assessment of on-site species and conclusion that no further surveys would be required, and recommended a Condition be applied to any permission granted to secure the proposed mitigation measures in the form of a Construction Environmental Management Plan (**CEMP**).

### *Biodiversity*

162. The Applicant has stated that subject to the full implementation of the previously mentioned landscaping, the proposed development would result in a gain of more than 10% thereby meeting the statutory requirement.
163. In response, the County Ecologist is satisfied that the required BNG is achievable, though noted that the classification of the site within the BNG Metric is inaccurate albeit this does not have an impact on the overall gain achieved.

### *Officer Assessment*

164. Officers agree that the Condition for a CEMP should be applied to any permission granted in order to secure precautionary measures in respect of protected and other species.
165. While every grant of planning permission is deemed to have been granted subject to the Statutory Condition that the biodiversity gain objective is met, officers recommend that other Conditions are attached to ensure that the applicant meets all the requirements of BNG. These conditions relate to providing a Habitats Maintenance and Management Plan (**HMMP**), confirmation of HMMP implementation, HMMP monitoring reports, and a Biodiversity Gain Plan.

166. Subject to the application of the above-mentioned Conditions, Officers consider that the proposal meets development plan policy and statutory requirements in this regard.

## **FLOOD RISK AND DRAINAGE**

### **Woking Core Strategy 2012**

#### Policy CS9 – Flooding and water management

167. NPPF paragraph 165 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.

168. NPPF paragraph 173 states that when determining any planning applications, planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

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

169. NPPF paragraph 174 states that applications for some minor development should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments.

A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3.

170. Annex 3 of the NPPF details flood risk vulnerability classifications, with non-residential uses for educational establishments being “more vulnerable”.

171. Paragraphs 004, 005, 020, 021, 023, 027, 031, 035, 037, 041, 042, 056 and 059 of the PPG titled Flood risk and coastal change respectively state the process used in decision-making where flood risk is a consideration, how to determine whether a proposed development will be safe for its lifetime, what a site-specific flood risk assessment is and the level of detail required, what the Sequential and Exceptions Tests are and how to apply them, how to demonstrate a development would reduce flood risk, what residual risk is and how to address it, and what information to consider and submit regarding sustainable drainage systems.

172. Due to the location of the application site within Flood Zone 2, the Applicant has carried out a Flood Risk Assessment, which indicates there would be a low risk to the proposed development from surface water and pluvial flooding and a low to moderate risk from groundwater and fluvial flooding.

173. In order to attenuate such risk, the Applicant has presented a Drainage Strategy which includes the use of channel drains, yard and road gullies, porous pavement within the



vehicle parking area, and a geocellular attenuation tank beneath the vehicle parking area to capture surface water runoff and storm water, which would then be discharged into the existing Thames Water network. The porous pavement within the vehicle parking area would also feature a separator to trap oils and other pollutants.

174. The proposed development would also connect to the schools' existing wastewater drainage infrastructure to dispose of foul water, with the Applicant receiving confirmation from Thames Water that there is sufficient sewerage capacity.
175. During construction, runoff control measures should be implemented, and gullies and piped systems should be capped to prevent contamination. Maintenance measures for the operational system are also presented, including regular litter and debris removal.
176. In response to a consultation request, the Lead Local Flood Authority (**LLFA**) stated they were satisfied that the sequential test had been followed and that the proposed drainage scheme was well-considered and designed.
177. The Environment Agency were also consulted but had no comments to make.

#### *Officer Assessment*

178. Alongside the application site, the entirety of the school playing fields and some of the existing school buildings, including the sports hall, part of the performing arts and drama wing, and the recently constructed arts block, are all within Flood Zone 2.
179. There is therefore no opportunity for the proposed development to be situated in a location with lower flood risk within the wider school site, and as the proposed development is classified as "more vulnerable", the Exception Test does not need to be applied.
180. However, a site-specific flood and surface water risk assessment is still required. Officers consider the Applicant has carried out an appropriate and proportionate assessment and are satisfied that through the incorporation of the proposed sustainable drainage system, the proposed development would not increase flood or surface water risk either within the school site or the surrounding areas.
181. Although no Conditions were proposed by the LLFA, Officers consider that a Condition should be applied to any permission granted to ensure the proposed drainage system is implemented as proposed and that mitigation measures are put in place.
182. Subject to the application of such Conditions, Officers consider that development plan policies in relation to flood risk and drainage would be fulfilled.

## **HERITAGE**

### **Woking Core Strategy 2012**

Policy CS20 – Heritage and conservation

183. NPPF paragraph 200 states that in determining applications, planning authorities should require an Applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the assets assessed using appropriate expertise where necessary.
184. NPPF paragraph 201 states that planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by

development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

185. NPPF paragraph 203 states that in determining applications, planning authorities should take account of:
- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
  - b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - c) The desirability of new development making a positive contribution to local character and distinctiveness.
186. NPPF paragraph 205 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
187. NPPF paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of grade II listed buildings should be exceptional.
188. NPPF paragraph 207 states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) The nature of the heritage asset prevents all reasonable uses of the site; and
  - b) No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
  - c) Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
  - d) The harm or loss is outweighed by the benefit of bringing the site back into use.
189. NPPF paragraph 208 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
190. NPPF paragraph 209 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
191. Paragraphs 009, 013 and 018 of the PPG titled Historic environment respectively state how to assess the significance of heritage assets, how settings should be taken into account, and how to assess harm to heritage assets
192. As the application site is over 0.4ha, an archaeological assessment and investigation may be required.

193. Surrey Historic Environment Record (**HER**) has confirmed there are no known heritage assets within 100m of the boundary of the site, but stated the site has moderate archaeological potential due to a number of archaeological discoveries within 1km and should be subject to a trial trench evaluation.
194. The Applicant therefore undertook an Archaeological Assessment, which details that evidence of Mesolithic to Neolithic struck flint; worked and burnt flint of probable Neolithic date, located close to three postholes containing wooden posts; a Late Bronze Age urn; an Iron Age and Romano-British occupation site, including pottery, loom weights, pot boilers and a glass bead; Early Iron Age pottery; fragments of a large 1st Century Romano-British urn and another small vessel, alongside small sherds of pottery; an abraded sherd of Romano-British pottery, alongside a narrow gully and small pit; 12th Century pottery; a small quantity of Early Medieval pottery sherds; and a large assemblage of Post-Medieval pottery and ceramic building material ranging in date from the 15th to 19th Centuries, has been found nearby.
195. As the proposed development would involve groundworks that may impact any potential archaeological deposits, the Assessment concludes in agreement with Surrey HER that archaeological trial trench evaluation should be undertaken, with the form and character of this work being defined within a Written Scheme of Investigation.
196. The Applicant therefore prepared a Written Scheme of Investigation and undertook an archaeological trial trench excavation within the application site in line with this scheme. It is understood that a total of 71 archaeological features of probable post-medieval date were revealed within two of the five trenches, including fragments of peg tiles, roof tiles, brick, stoneware, pottery, glassware and heavily corroded iron. No archaeological features were identified at the western end of the site where the new SEN building would be sited, and no further work was therefore recommended.

#### *Officers Assessment*

197. Officers recognise that there are no heritage assets within the vicinity of the application site, with the closest being the Grade II listed farmhouse, barn and granary at White Rose Farm, some 360m to the north at their closest points. These are beyond the remainder of the school playing fields, the large area of established dense woodland on either side of the Hoe Stream, and the Hoe Stream itself, so the proposed development is not considered to affect their character.
198. Officers are satisfied that the Applicant has undertaken an appropriate evaluation of archaeological features within the application site and are satisfied with the conclusion that no further work is required.
199. Therefore, Officers consider that development plan policies in relation to heritage are satisfied.

## **WASTE MANAGEMENT ISSUES**

### **Surrey Waste Local Plan 2019-2033**

#### **Policy 4 – Sustainable Construction and Waste Management in New Development**

200. The Applicant has recognised the potential for the proposed development to aid in reducing the impact of waste generated and the associated carbon for transport of materials and waste to and from the application site, stating that construction waste would be minimised through use of pre-fabricated off-site components, modern methods of construction, use of cement replacements, material specifications with high recycled content,

use of renewable and bio-based materials, evaluation of products with environmental products declarations, consideration of life cycle impacts, and prioritising locally sources materials where possible.

201. During the operational phase, refuse storage would be provided with clear signage to encourage separation of solid waste for recycling and residual waste. Waste would be segregated at source into multiple streams and would be collected in colour coded bags to reduce contamination risk.
202. There would also be targets for construction waste in line with best practice and requirements to minimise waste and provide adequate storage for waste and recycling during operation.
203. The Applicant has stated that a Resource Management Plan (**RMP**) should be developed, to outline key objectives to achieve efficient use of material resources and set out strategies to reuse, recycle or recover at least 90% of construction and demolition waste produced on site.

#### *Officer Assessment*

204. Taking the nature of the existing application site and proposed development into account, Officers recognise that there would be limited opportunities to re-use and recycling of construction and demolition residues.
205. However, Officers also recognise that waste generated during both the construction and operational phases would be limited through a variety of measures, and consider that such should be incorporated into an RMP which should be required by Condition on any permission granted.
206. Subject to the application of such a Condition, Officers consider that development plan policies in relation to waste management issues would be fulfilled.

### **CONCLUSIONS ON GREEN BELT**

#### *Harm*

207. The proposed development is inappropriate and therefore harm would be caused to the Green Belt by reason of such inappropriateness. Further, harm to the openness of the Green Belt would result. In the preceding sections of the report, other harm has been identified and assessed, comprising visual, air quality, noise and lighting impacts and additional vehicular movements along Coniston Road, but these would be mitigated by appropriate planning Conditions.
208. The Applicant recognises that harm to openness would result. However, they have stated that the application site already comprises extensive hardstanding and is subject to an urban influence due to the surrounding educational, residential and community uses. Further, the proposed SEN building would fulfil a clear educational need and would be located adjacent to the existing cluster of school buildings, with the wooded area to the south providing visual screening.
209. The Applicant has therefore concluded that the visual and spatial harm to openness caused by the proposed development would not be significant. Officers agree with this assessment.

#### *Very Special Circumstances*

210. Officers recognise that the entirety of the existing school grounds, including all existing buildings, as well as the adjacent Woking College and Cardinals Community Football Centre, are all within the Green Belt, and that there is therefore no alternative to positioning the proposed development within this designation.
211. Alongside its location within the existing school grounds, in close proximity to the existing school buildings, and within the wider urban area, Officers have already concluded that the complimentary materials to be used for the proposed development, the screening provided by existing surrounding woodland, and the application of the aforementioned proposed Conditions would reduce harm to a minimum. Against this is the clear educational need for the development which can be given great weight in the planning balance. Officers conclude that the need for this facility outweighs the harm caused to the Green Belt, including the harm to openness and the other harm identified in the previous sections of the report which would be minimised and controlled by planning Conditions.
212. Taking this into account, Officers consider that development plan policies in relation to Green Belt would be satisfied.
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### **Human Rights Implications**

213. 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.
214. In this case, it is the Officers view that the scale of any impacts is not considered sufficient to engage Article 6 or Article 1 of Protocol 1 and, taking into account the representations made in relation to the impact of the proposed development on residential amenity, impacts can be mitigated by Condition. As such, this proposal is not considered to interfere with any Convention right.
215. The CPA 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.
216. In this case, the CPA has considered its duty under the Equality Act 2010 and concludes that this application does not give rise to any considerations on equality.
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### **Conclusion**

217. This application is submitted seeking planning permission for the erection and use of a new SEN building and associated parking area, with access from Coniston Road.
218. This new SEN building would provide for 30 pupils and would feature a vehicle parking area and access from Coniston Road which would be exclusive to the proposed development.
219. Officers are satisfied that the Applicant has demonstrated a clear need for the proposed development, and that subject to the application of Conditions on any permission granted, no significantly adverse impacts would result.
220. While Officers recognise that the application site is located within the Metropolitan Green Belt, and that the proposal constitutes inappropriate development, Officers are satisfied that very special circumstances exist and clearly outweigh the harm caused to the Green Belt by reason of inappropriateness, and other harm. Therefore, Officers conclude that planning permission should be granted subject to the imposition of Conditions.

## Recommendation

The recommendation is to **GRANT** planning application ref: WO/PLAN/2024/0633 subject to the following Conditions:

### Conditions:

**IMPORTANT – CONDITION NO(S) 3, 5, 8, 19, 21 AND 24 MUST BE DISCHARGED PRIOR TO THE COMMENCEMENT OF THE DEVELOPMENT.**

#### Approved Plans

1. The development hereby permitted shall be carried out in all respects in accordance with the following plans/drawings:

Drawing No. 5219373-ATK-XX-00-DR-C-00002 Rev P01 Proposed Surface and Foul Water Drainage Layout Sheet 1 of 2 dated 6 June 2024

Drawing No. 5219373-ATK-XX-00-DR-C-00003 Rev P01 Proposed Surface and Foul Water Drainage Layout Sheet 2 of 2 dated 6 June 2024

Drawing No. 5219373-ATK-XX-00-DR-C-70001 Rev P01 Drainage Schedule dated 6 June 2024

Drawing No. 5219373-ATK-XX-00-DR-C-71001 Rev P01 Proposed Utilities Master Plan dated 6 June 2024

Drawing No. PR-320-ATK-XX-XX-DR-E-60111 Rev P02 External Lighting Lux Level Assessment dated 12 September 2024

Drawing No. PR-321-PEV-XX-00-DR-L-01200 Rev P5 Landscape Plan Works Stage Three dated 21 November 2024

Drawing No. PR-321-PEV-XX-00-DR-L-01201 Rev P4 Planting Plan dated 9 April 2024

Drawing No. PR-321-PEV-XX-00-DR-L-01203-P1-Tree Pit Typical Tree Pit Detail dated 25 January 2024

Drawing No. PR-321-PEV-XX-R1-DR-A 01210 Rev E Proposed Roof Plan dated 28 May 2024

Drawing No. PR-321-PEV-XX-XX-DR-A-00050 Rev D Location Plan dated 28 May 2024

Drawing No. PR-321-PEV-XX-XX-DR-A-00200 Rev G Proposed School Boundary Site Plan dated 28 May 2024

Drawing No. PR-321-PEV-XX-XX-DR-A-00210 Rev H Proposed SEND Unit Site Plan dated 28 May 2024

Drawing No. PR-321-PEV-XX-XX-DR-A-01410 Rev C Proposed Fire Strategy - Site Plan dated 28 May 2024

Drawing No. PR-321-PEV-XX-XX-DR-A 03000 Rev E Proposed External Elevations dated 28 May 2024

Drawing No. PR-321-PEV-XX-XX-DR-A 07000 Rev D Proposed Bin Store Plan and Elevations dated 28 May 2024

#### Details of Buildings

2. The materials used on the exterior of the development hereby permitted shall be in accordance with the details contained within sections 4.9 and 4.10 of the Design and Access Statement dated May 2024.

#### Dust

3. Prior to the commencement of the development hereby permitted, a Dust Management Plan (DMP) shall be submitted to and approved in writing by the County Planning Authority.

The DMP shall include, but not be limited to, the Dust Mitigation Measures detailed under the "South Site" column of Tables 9, 10, 11 and 12 within Section 7.1, and the Air Quality

Mitigation Measures within Section 7.2, of the Air Quality Screening and Dust Risk Assessment dated 23 September 2023.

The approved DMP shall thereafter be implemented during the construction and operation of the development hereby permitted.

**Noise**

- 4. All operations and activities related to the construction of the development hereby permitted shall only be carried out between the hours of 0800 and 1800 Mondays to Fridays and 0700 to 1300 on Saturdays.

Notwithstanding the above, there shall be no movements to or from the application site related to the construction of the development hereby permitted, and no HGVs associated with the construction of the development laid up waiting on the public highway in the vicinity of the application site, between the hours of 0800 and 0915 and between 1500 and 1700 Mondays to Fridays.

No operations and activities related to the construction of the development hereby permitted shall be carried out at any time on Sundays or any Public, Bank, or National Holiday.

- 5. Prior to the commencement of the development hereby permitted, a Construction Noise Management Plan (CNMP) shall be submitted to and approved in writing by the County Planning Authority.

The CNMP shall include, but not be limited to:

- a) Noise limits at noise sensitive receptors
- b) Noise impact assessments
- c) Mitigation measures (if required)
- d) Monitoring procedure, and
- e) Complaints procedure

The approved CNMP shall thereafter be implemented during the construction of the development hereby permitted.

- 6. The Rating Level, LA<sub>r</sub>,Tr, of the noise emitted from all plant, equipment and machinery (including any kitchen extract etc) associated with the application site shall not exceed the existing representative LA<sub>90</sub> background sound level at any time by more than +5dB(A) at the nearest noise sensitive receptors (residential or noise sensitive building). The assessment shall be conducted in accordance with the current version of British Standard (BS) 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'.

The existing representative LA<sub>90</sub> background sound level shall be determined by measurement that shall be sufficient to characterise the environment. The representative level should be justified following guidance contained within the current version of BS 4142:2014:A1+2019 and agreed with the County Planning Authority.

**Lighting**

- 7. External lighting to be installed in connection with the development hereby permitted, as shown on Drawing No. PR-320-ATK-XX-XX-DR-E-60111 Rev P02 External Lighting Lux Level Assessment dated 12 September 2024, shall be operated in accordance with the mitigation measures detailed within section 6.30 of the Supporting Planning Report dated July 2024 and sections 4.2 and 4.4.2 of the Preliminary Ecological Appraisal Report dated August 2023.

No other external lighting shall be installed at the application site.

### **Highways, Traffic and Access**

8. Prior to the commencement of the development hereby permitted, a final Construction Transport Management Plan (CTMP) shall be submitted to and approved in writing by the County Planning Authority.

The CTMP shall include, but not be limited to:

- a) Details of parking for vehicles of site personnel, operatives and visitors.
- b) Details of loading and unloading of plant and materials.
- c) Details of storage of plant and materials.
- d) Programme of works (including measures for traffic management).
- e) Details of boundary hoarding provision behind any visibility zones.
- f) Details of HGV deliveries and hours of operation.
- g) Details of vehicle routing.
- h) Measures to prevent the deposit of materials on the highway.
- i) Before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused.
- j) Details of on-site turning for construction vehicles.

The approved CTMP shall thereafter be implemented during the construction of the development hereby permitted.

9. The development hereby permitted shall not be first occupied unless and until the proposed access to Coniston Road, including the proposed change in priority, has been constructed and provided with visibility zones in accordance with a scheme to be submitted to and approved in writing by the County Planning Authority. The scheme shall provide a continuous pedestrian footway across the site access junction and will be subject to the County Highway Authority's detailed design review and Road Safety Audit process. The visibility zones shall thereafter be kept permanently clear of any obstruction over 0.6m high.
10. The development hereby permitted shall not be first occupied unless and until space has been laid out within the application site in accordance with Drawings Nos. PR-321-PEV-XX-XX-DR-A-00200 Rev G Proposed School Boundary Site Plan dated 28 May 2024 and PR-321-PEV-XX-XX-DR-A-00210 Rev H Proposed SEND Unit Site Plan dated 28 May 2024 for vehicles to be parked, pupils to be dropped off and collected, and for vehicles to turn so that they may enter and leave the application site in forward gear. Thereafter, the parking, drop-off and collection and turning areas shall be retained and maintained for their designated purposes.
11. The development hereby permitted shall not be first occupied unless and until a final Car Parking Management Plan (CPMP) has been submitted to and approved in writing by the County Planning Authority.

The CPMP shall include, but not be limited to:

- a) The types of service vehicles to be used and hours of their operation.
- b) The design of delivery areas within the application site.
- c) The dimensions and layout of lorry parking area(s) and turning space.
- d) The management of on-site parking arrangements, including the policing of each dedicated parking use and the process for allowing the double parking of staff vehicles during periods of high demand.
- e) The management of pupil transport to and from the school, including use of the most appropriate type of vehicle in order to minimise the overall number of vehicle trips to/from the school.



The approved CPMP shall thereafter be implemented during the operation of the development hereby permitted.

12. The development hereby permitted shall not be first occupied unless and until at least 50% of the proposed staff parking spaces (10 of the proposed 20 total staff spaces) have been provided with a fast-charge Electric Vehicle charging point (current minimum requirements - 7kW Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) and the remainder of staff parking spaces have been provided with cabling for the future provision of charging points, all in accordance with a scheme to be submitted to and approved in writing by the County Planning Authority. The approved charging points and cabling shall thereafter be retained and maintained for their designated purposes.
13. The development hereby permitted shall not be first occupied unless and until facilities for the secure, lit and covered parking of bicycles and a charging point with timer for e-bikes by said facilities have been provided in accordance with a scheme to be submitted to and approved in writing by the County Planning Authority. The bicycle parking provision shall include capacity for at least 10 bicycles, no less than two of which are to be of sufficient size and accessibility to accommodate adapted cycles. The approved facilities and charging point shall thereafter be retained and maintained for their designated purposes.
14. The development hereby permitted shall not be first occupied unless and until a Travel Plan for the SEN building hereby permitted has been submitted to and approved in writing by the County Planning Authority. The submitted Travel Plan shall include details of measures to promote sustainable modes of transport and provisions for the maintenance, monitoring and review of the impact of the Plan and its further development. The approved Plan shall thereafter be implemented as approved during the operation of the development hereby permitted.
15. The means of vehicular access to the development hereby permitted shall be solely from Coniston Road, and only vehicles associated with the development hereby permitted shall use this access.
16. From the first use of the vehicle parking area hereby permitted, the hours of use shall be:  
0700 – 1800 Mondays to Fridays  
  
And at no time no Saturdays, Sundays, or Public, Bank or National Holidays.

### **Landscaping**

17. The development hereby permitted shall be carried out in accordance with section 3 of the Arboricultural Method Statement dated January 2024.
18. Landscaping of the development hereby permitted, as shown on Drawings Nos. PR-321-PEV-XX-00-DR-L-01200 Rev P5 Landscape Plan Works Stage Three dated 21 November 2024, PR-321-PEV-XX-00-DR-L-01201 Rev P4 Planting Plan dated 9 April 2024, and PR-321-PEV-XX-00-DR-L-01203-P1-Tree Pit Typical Tree Pit Detail dated 25 January 2024 all approved as part of the application, shall be implemented in full within the first available planting season following the commencement of construction of the development hereby permitted and retained thereafter as such.

### **Ecology and Biodiversity**

19. Prior to the commencement of the development hereby permitted, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the County Planning Authority.

The CEMP shall include, but not be limited to, the mitigation measures detailed within section 4.4 of the Preliminary Ecological Appraisal Report dated August 2023.

The approved CEMP shall thereafter be implemented during the construction of the development hereby permitted.

20. The Biodiversity Gain Plan shall be prepared in accordance with the Preliminary Ecological Appraisal Report version 1 dated August 2023, the Biodiversity Metric Report version 5 dated November 2024, and the Draft Biodiversity Gain Plan dated August 2024.
21. Prior to the commencement of the development hereby permitted, a Habitats Maintenance and Management Plan (HMMP) shall be submitted to and approved in writing by the County Planning Authority.

The HMMP shall include, but not be limited to:

- a) Details of on-site enhancements to be included in the development hereby permitted.
- b) Details of how the on-site enhancements shall be managed.
- c) Details and schedule of monitoring of habitats on the site, including how and when monitoring will take place and how and when management proposals will be reviewed, and the frequency of monitoring reports.
- d) Any changes to the management of the habitat to achieve the habitats or wider outcomes.

The approved HMMP shall thereafter be implemented for a minimum period of 30 years, which shall begin on completion of the development hereby permitted.

22. Notice shall be given to the County Planning Authority in writing when all habitat implementation works are completed in accordance with the approved Habitats Maintenance and Management Plan.

### **Flood Risk and Surface Water Drainage**

23. The development hereby permitted shall not be first occupied unless and until the drainage scheme as detailed within section 4.2 of the Drainage Strategy Report dated 24 May 2024 and Drawings Nos. 5219373-ATK-XX-00-DR-C-00002 Rev P01 Proposed Surface and Foul Water Drainage Layout Sheet 1 of 2 dated 6 June 2024, 5219373-ATK-XX-00-DR-C-00003 Rev P01 Proposed Surface and Foul Water Drainage Layout Sheet 2 of 2 dated 6 June 2024 and 5219373-ATK-XX-00-DR-C-70001 Rev P01 Drainage Schedule dated 6 June 2024 all approved as part of the application has been implemented in full. The drainage scheme shall thereafter be maintained in accordance with the approved details for its designated purpose.

### **Waste Management**

24. Prior to the commencement of the development hereby permitted, a Resource Management Plan (RMP) shall be submitted to and approved in writing by the County Planning Authority.

The RMP shall include, but not be limited, measures to achieve the Construction Waste Management key objectives, strategies and targets detailed within section 3.5 the Sustainability Design and Construction Statement Rev 1.1 dated 3 June 2024.

The approved RMP shall thereafter be implemented during the construction of the development hereby permitted.

### **Reasons:**

1. For the avoidance of doubt and in the interests of proper planning.

2. To comply with the terms of the application, enable the County Planning Authority to exercise planning control, and to safeguard local amenity, in accordance with National Planning Policy Framework December 2023 paragraphs 128 and 135, Woking Core Strategy 2012 Policies CS21 and CS24, and Woking Development Management Policies Development Plan Document 2016 Policy DM21.
3. To comply with the terms of the application, enable the County Planning Authority to exercise planning control, and to safeguard local amenity, in accordance with National Planning Policy Framework December 2023 paragraphs 108 and 180; Woking Core Strategy 2012 Policy CS21; and Woking Development Management Policies Development Plan Document 2016 Policies DM5, DM6 and DM21.

Compliance with this Condition is required prior to the commencement of the development hereby permitted to ensure effective dust control throughout the construction and operation phases.

4. To comply with the terms of the application, enable the County Planning Authority to exercise planning control, and to safeguard the environment and local amenity during the construction of the development, in accordance with National Planning Policy Framework December 2023 paragraphs 108, 114, 116, 180 and 191; and Woking Development Management Policies Development Plan Document 2016 Policies DM5, DM7 and DM21.
5. To enable the County Planning Authority to exercise planning control and to safeguard the environment and local amenity during the construction of the development in accordance with National Planning Policy Framework December 2023 paragraphs 180 and 191; and Woking Development Management Policies Development Plan Document 2016 Policies DM5, DM7 and DM21.

Compliance with this Condition is required prior to the commencement of the development hereby permitted to ensure effective noise control throughout the construction phase.

6. To enable the County Planning Authority to exercise planning control and to safeguard the environment and local amenity during the operation of the development in accordance with National Planning Policy Framework December 2023 paragraphs 180 and 191; and Woking Development Management Policies Development Plan Document 2016 Policies DM5, DM7 and DM21.
7. To comply with the terms of the application, enable the County Planning Authority to exercise planning control, and to safeguard local amenity, in accordance with National Planning Policy Framework December 2023 paragraphs 180, 186 and 191; Woking Core Strategy 2012 Policies CS7 and CS21; and Woking Development Management Policies Development Plan Document 2016 Policies DM5, DM7 and DM21.
8. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework December 2023 paragraphs 108, 114 and 116; Surrey Local Transport Plan 4 2022; and Woking Development Management Policies Development Plan Document 2016 Policy DM21.

Compliance with this Condition is required prior to the commencement of the development hereby permitted to ensure effective public highway protection throughout the construction phase.

9. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework December 2023 paragraphs 108, 114 and 116; Surrey Local Transport Plan 4 2022; Woking Core Strategy 2012 Policy CS18; and Woking Development Management Policies Development Plan Document 2016 Policy DM21.

10. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework December 2023 paragraphs 108, 114 and 116; Surrey Local Transport Plan 4 2022; and Woking Development Management Policies Development Plan Document 2016 Policy DM21.
11. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework December 2023 paragraphs 108, 114 and 116; Surrey Local Transport Plan 4 2022; and Woking Development Management Policies Development Plan Document 2016 Policy DM21.
12. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework December 2023 paragraphs 108, 114 and 116; Surrey Local Transport Plan 4 2022; Surrey Healthy Streets Guidance; Woking Core Strategy 2012 Policies CS16 and CS18; and Woking Development Management Policies Development Plan Document 2016 Policy DM21.
13. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework December 2023 paragraphs 108, 114, 116, 128 and 135; Surrey Local Transport Plan 4 2022; Surrey Healthy Streets Guidance; Woking Core Strategy 2012 Policies CS16 and CS18; and Woking Development Management Policies Development Plan Document 2016 Policy DM21.
14. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework December 2023 paragraphs 108, 114, 116, 117 and 128; Surrey Local Transport Plan 4 2022; Woking Core Strategy 2012 Policies CS18; and Woking Development Management Policies Development Plan Document 2016 Policy DM21.
15. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework December 2023 paragraphs 108, 114 and 116; Surrey Local Transport Plan 4 2022; Woking Core Strategy 2012 Policy CS18; and Woking Development Management Policies Development Plan Document 2016 Policy DM21.
16. In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework December 2023 paragraphs 108, 114 and 116; Surrey Local Transport Plan 4 2022; and Woking Development Management Policies Development Plan Document 2016 Policy DM21.
17. To comply with the terms of the application, enable the County Planning Authority to exercise planning control, and to safeguard local amenity, in accordance with National Planning Policy Framework December 2023 paragraphs 136 and 180; Woking Core Strategy 2012 Policies CS21 and CS24; and Woking Development Management Policies Development Plan Document 2016 Policies DM1, DM2 and DM21.
18. To comply with the terms of the application, enable the County Planning Authority to exercise planning control, and to safeguard local amenity, in accordance with National Planning Policy Framework December 2023 paragraphs 135, 136 and 180; Woking Core Strategy 2012 Policies CS21 and CS24; and Woking Development Management Policies Development Plan Document 2016 Policies DM1, DM2 and DM21.
19. To comply with the terms of the application, enable the County Planning Authority to exercise planning control, and to safeguard local amenity, in accordance with National Planning Policy Framework December 2023 paragraph 124; Woking Core Strategy 2012 Policies CS16, CS21 and CS22; and Woking Development Management Policies Development Plan Document 2016 Policy DM21.

Compliance with this Condition is required prior to the commencement of the development hereby permitted to ensure effective ecological protection throughout the construction phase.

20. To ensure the development delivers a biodiversity net gain and promotes nature conservation and management, and to secure biodiversity enhancement in accordance with Schedule 7A of the Town and Country Planning Act 1990, National Planning Policy Framework December 2023 paragraphs 180 and 186, and Woking Core Strategy 2012 Policies CS7 and CS22.
21. To ensure the development delivers a biodiversity net gain and promotes nature conservation and management, and to secure biodiversity enhancement in accordance with Schedule 7A of the Town and Country Planning Act 1990, National Planning Policy Framework December 2023 paragraphs 180 and 186, and Woking Core Strategy 2012 Policies CS7 and CS22.

Compliance with this Condition is required prior to the commencement of the development hereby permitted as it relates to statutory biodiversity net gain.

22. To ensure the development delivers a biodiversity net gain and promotes nature conservation and management, and to secure biodiversity enhancement in accordance with Schedule 7A of the Town and Country Planning Act 1990, National Planning Policy Framework December 2023 paragraphs 180 and 186, and Woking Core Strategy 2012 Policies CS7 and CS22.
23. To comply with the terms of the application, enable the County Planning Authority to exercise planning control, and to safeguard local amenity, in accordance with National Planning Policy Framework December 2023 paragraphs 165, 173 and 180; Woking Core Strategy 2012 Policies CS9, CS16 and CS21; and Woking Development Management Policies Development Plan Document 2016 Policy DM21.
24. To comply with the terms of the application, enable the County Planning Authority to exercise planning control, and to safeguard local amenity, in accordance with Surrey Waste Local Plan 2019-2033 Policy 4, Woking Core Strategy 2012 Policies CS21 and CS22, and Woking Development Management Policies Development Plan Document 2016 Policy DM21.

Compliance with this Condition is required prior to the commencement of the development hereby permitted to ensure efficient use of material resources and the reduction of waste throughout the construction phase.

#### **Informatives:**

1. Biosecurity is very important to minimise the risks of pests and diseases being imported into the UK and introduced into the environment. It is recommended that all trees grown abroad, but purchased for transplanting, shall spend at least one full growing season on a UK nursery and be subjected to a pest and disease control programme. Evidence of this control programme, together with an audit trail of when imported trees entered the UK, their origin and the length of time they have been in the nursery should be requested before the commencement of any tree planting. If this information is not available, alternative trees sources should be used. You are advised to consult the relevant UK Government agencies such as the Animal and Plant Health Agency (APHA) and the Forestry Commission for current guidance, Plant Passport requirements and plant movement restrictions. Quality Assurance Schemes followed by nurseries should also be investigated when researching suppliers. For larger planting schemes, you may wish to consider engaging a suitably qualified professional to oversee tree/plant specification and planting.

2. The developer is advised that as part of the detailed design of the highway works required by the above condition(s), the County Highway Authority may require necessary accommodation works to streetlights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.
3. It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands, and that any power balancing technology is in place if required. Electric Vehicle Charging Points shall be provided in accordance with the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development 2023.
4. It is the responsibility of the developer to provide e-bike charging points with socket timers to prevent them constantly drawing a current overnight or for longer than required. Signage should be considered regarding damaged, or shock impacted batteries, indicating that these should not be used/charged. The design of communal bike areas should consider fire spread and there should be detection in areas where charging takes place.
5. The permission hereby granted shall not be construed as authority to carry out any works on the highway. The Applicant is advised that prior approval must be obtained from the Highway Authority before any works are carried out on the public highway <https://www.surreycc.gov.uk/land-planning-and-development/planning/transport-development/alterations-to-existing-roads>
6. The attention of the Applicant is drawn to the requirements of Sections 7 and 8 of the Chronically Sick and Disabled Persons Act 1970 and to Department for Children, Schools and Families Building Bulletin 102 'Designing for disabled children and children with Special Educational Needs' published in 2008 and Department of Education Building Bulletin 104 'Area guidelines for SEND and alternative provision' December 2015, or any prescribed document replacing these notes.
7. This approval relates only to the provisions of the Town and Country Planning Act 1990 and must not be taken to imply or be construed as an approval under the Building Regulations 2000 or for the purposes of any other statutory provision whatsoever.
8. In determining this application the County Planning Authority has worked positively and proactively with the Applicant by entering into pre-application discussions and 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. Further, the County Planning Authority has identified all material considerations, forwarded consultation responses to the Applicant, considered representations from interested parties, liaised with consultees and the Applicant to resolve identified issues, and determined the application within the timeframe agreed with the Applicant. The Applicant has also been given advance sight of the draft planning conditions. This approach has been in accordance with the requirements of paragraph 38 of the National Planning Policy Framework December 2023.

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**Contact James Nolan**

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### **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 Woking Borough Council planning register entry for this application can be found under application reference WO/PLAN/2024/0633.

### **Other documents**

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

### **Government Guidance**

[National Planning Policy Framework December 2023](#)

[Planning Practice Guidance – Air quality updated November 2019](#)

[Planning Practice Guidance – Biodiversity net gain updated May 2024](#)

[Planning Practice Guidance – Flood risk and coastal change updated August 2022](#)

[Planning Practice Guidance – Historic environment updated July 2019](#)

[Planning Practice Guidance – Light pollution updated November 2019](#)

[Planning Practice Guidance – Noise updated July 2019](#)

[Planning Practice Guidance – Tree Preservation Orders and trees in conservation areas published March 2014](#)

### **The Development Plan**

[Surrey Waste Local Plan 2019 to 2033](#)

[Woking Core Strategy October 2012](#)

[Woking Development Management Policies Development Plan Document October 2016](#)

### **Other Documents**

[Surrey Landscape Character Assessment: Woking Borough dated April 2015](#)

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