

To: Planning & Regulatory Committee

Date: February 2023

By: Planning Development Manager

District(s) Reigate & Banstead Borough Council **Electoral Division(s):**
 Earlswood & Reigate South
 Ms Baart

Case Officer: Dawn Horton-Baker

Purpose: For Decision

Grid Ref: 525837 148985

Title: Surrey County Council Proposal RE22/01796/CON

Land at Woodhatch Place, 11 Cockshot Hill, Woodhatch, Reigate, RE2 8EF

The erection of a part one, part two and part three storey building to provide a 5-form entry junior school, with two all-weather sports pitches, a MUGA pitch, a hard play area with netball court, and provision of car parking spaces and provision of a new internal access road with a new egress point on to Cockshot Hill, with associated hard and soft landscaping and off-site highways works.

Summary Report

The proposal is an application submitted by Surrey County Council under Regulation 3 of the Town and Country Planning General Regulations 1992 for the erection of a part one, part two and part three storey building with associated sports pitches and play areas to provide a new 5-form entry junior school as a replacement school for Reigate Priory Junior School.

The application site is currently part of the grounds of Woodhatch Place, which is now occupied as the main administrative centre for Surrey County Council, and is allocated as Urban Open Land in the Development Plan as well as being the site of non-designated heritage assets.

The proposal arises out of the urgent need to relocate Reigate Priory Junior School from its existing site within the Reigate Priory, which is a Grade I Listed Building and Scheduled Monument, as well as a statutory Historic Park and Garden. Reigate Priory School has been identified by the Department of Education Priority School Building Programme 2. It is identified as a school whose accommodation does not meet the required standards and is not fit for purpose for educational purposes. The programme targets schools in the UK in need of being rebuilt or refurbished and envisages that these modified schools would open as soon as possible.

The application site was chosen following an extensive search for a suitable site which has been continuing over several years.

National Planning Policy Guidance states that local planning authorities should give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications. Development plan policies also encourage development proposals of this nature.

The proposed new school can be accommodated on the application site in a way which meets the needs and requirements of the new school without serious harm arising to existing residential dwellings or other interests of acknowledged importance. There are areas of impact arising from the proposal which will require additional mitigation measures such as highways implications, ecology and biodiversity and residential amenity and these can be secured by appropriate planning conditions such that the harm is minimised to an acceptable degree. There is also a degree of harm arising to non-designated heritage assets and the character and appearance of the area but these harms are not considered to constitute serious harm such that the application should be refused.

The proposal will lead to the loss of part of an area designated Urban Open Space but officers consider that the proposal can be considered as an exception to that policy given it is for the essential needs of an existing school. It is considered in that regard that the harm caused is outweighed by other considerations, namely the need for the school.

Officers have weighed all of the aspects of this proposal in the planning balance and consider that the urgent need for the school outweighs the other considerations in this case such that the proposal can be positively and proactively supported and planning permission granted.

The recommendation is to permit subject to conditions

Application details

Applicant

SCC Property and ISG Ltd

Date application valid

3 August 2022

Period for Determination

12 October 2022

Amending Documents

- 07/09/22 Written Scheme of Investigation (archaeology)
- 11/10/22 Flood Risk Assessment P04
- 1138822-ACM-XX-XX-DR-C-0500-P04 Drainage Strategy Plan
- 1138822 Drainage Strategy
- 11/10/22 Email from Agent re Lighting
- 11/10/22 Bat Survey Report
- 11/10/22 Great Crested Newt Survey Report

- 11/10/22 Canon Building - Bat Survey Report v1
- 11/10/22 Email from Agent re SWT
- 04/11/22 Applicant Arboriculture Email Response
- 15/11/22 RPS Fencing/LVIA Matters Applicant Response
- 14/12/22 Transport assessment - part 6a of 6 (appendix I start)
- 14/12/22 Transport assessment - part 6b of 6 (appendices I end, J & K)
- 20/12/22 AECOM Biodiversity Net Gain report, December 2022
- 20/12/22 AECOM Preliminary Ecological Assessment
- 20/12/22 Baseline Metric Calculations (V1_LCD), December 2022
- 18/01/23 Velocity Transport Planning Letter
- 18/01/23 Air Quality Assessment- Update 03012023

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
EDUCATIONAL NEED/ALTERNATIVE SITE ASSESSMENT	YES	30 - 49
IMPACT ON STATUTORY AND NON-STATUTORY HERITAGE ASSETS	NO	50 - 92
TREES, ECOLOGY AND BIODIVERSITY	NO	93 - 144
DESIGN AND VISUAL APPEARANCE AND URBAN OPEN SPACE CONSIDERATIONS	ON BALANCE CAN BE CONSIDERED FAVOURABLY	145 -172
IMPACT ON RESIDENTIAL AMENITY	YES S/T CONDITIONS	173 - 220
DRAINAGE AND FLOOD RISK CONSIDERATIONS	YES S/T CONDITIONS	221 - 235
HIGHWAYS CONSIDERATIONS	YES S/T CONDITIONS	236 - 280
SUSTAINABLE CONSTRUCTION	YES	281 - 283

Illustrative material

Site Plan

Plan 1

Aerial Photographs

Aerial 1

Site Photographs

Fig 1 Looking south over site of proposed school buildings showing trees to be removed (left of photograph) and existing boundary screening (to east of photo) to be retained.

Fig 2 Looking north towards Woodhatch Place over the proposed area of the all-weather pitches

Fig 3 The Belvederes apartment block and the southern edge of the application site

Fig 4 Looking across the application site towards the south west showing the site of the proposed all weather pitches and the existing tree groups in the foreground to be removed to accommodate the school building.

Fig 5 The application site viewed from Woodhatch Lodge showing ponds to be retained and in the distance The Belvederes apartment block

Fig 6 Looking southeast towards the existing access into Woodhatch Place to be used to access the new school

Fig 7 Cockshot Hill boundary

Fig 8 and 8a Two photos above provided by the applicant showing the existing boundary and then a visualisation of the proposed new school exit and boundary treatment onto Cockshot Hill

Fig 9 and 9a Two photos above provided by the applicant showing a view of the site from the south and then a visualisation showing the new school building

Fig 10 and 10a Two photos above provided by the applicant of the site as viewed from Woodhatch Park to the south of the site and then a visualisation showing the new school building

Fig 11 and 11a Two photos above provided by the applicant of the site as viewed from the southwest and then a visualisation showing the new school building

Fig 12 and 12a Two photos above provided by the applicant of part of the Cockshot Hill boundary and then a visualisation showing the new school building and egress point (to be created)

Fig 13 and 13a Two photos above provided by the applicant of the site as viewed from the wider grounds to the south of Woodhatch Place looking south towards the site and then a visualisation showing the new school building and proposed fencing across the site delineating the northern boundary of the all-weather playing pitches

Background

- 1 Reigate Priory Junior School currently operates from an historic building in the centre of Reigate, known as Reigate Priory as shown on the photographs below. The original part of this building has a long history dating back to Tudor times and is both Grade I listed and a Scheduled Ancient Monument. It is located in the historic Reigate Priory Park, which is listed separately, and was once a Monastery prior to their dissolution. Therefore, there is significant archaeological interest within the grounds of the existing school as well as the heritage significance of the buildings themselves.



Current school building



18th century staircase
Spaces within the current building



Holbein Hall Fire Place

- 2 The school currently shares the original Priory building with Reigate Priory Museum, which causes complications around prioritisation of use and access to certain spaces. The running of the museum in part of the school building is an ongoing operational and management issue for the school. As well as the main Priory building there is a second 1950s building on the existing site which mainly houses Year 6 pupils. This building is not significant from a heritage perspective and is isolated from the main school building by a Public Right of Way (FPs 632 and 633) through the school site, which poses further safeguarding and supervision issues.
- 3 The school was selected for Priority School Building Programme funding to address the significant condition needs it has, however, after a Department for Education

review of the existing school buildings and site constraints, it has been deemed unviable to bring the existing school up to modern standards on its current site. The decision was taken by Surrey County Council as Education Authority to find a site for a new school.

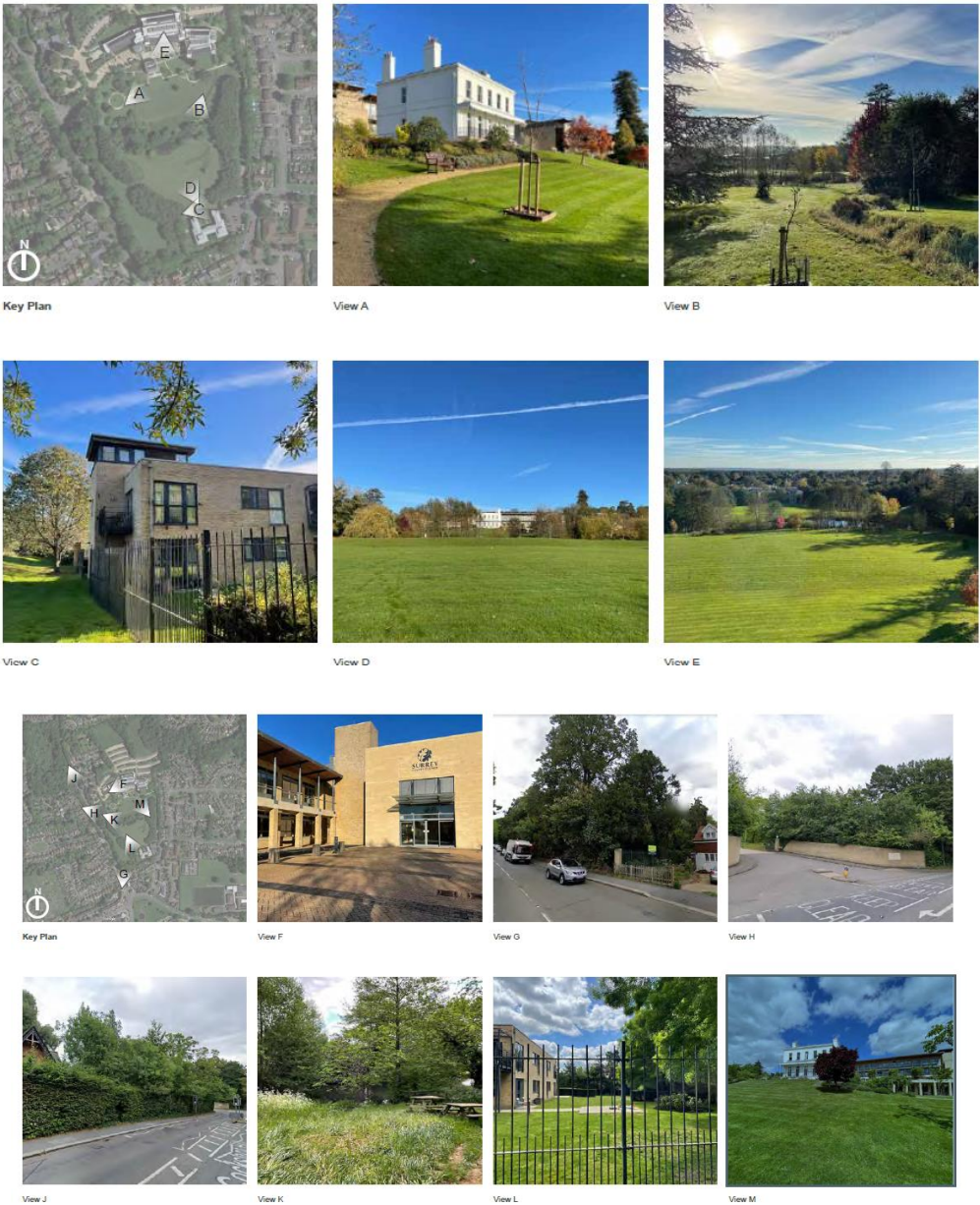
- 4 This proposal is for the construction of a new purpose built part one, two and three-storey building to cater for 600 pupils, aged 7-11. The size of the school meets the Department for Education's area standards set out in Building Bulletin 103 (BB103). To enable the school development, the proposal also includes changes to the existing Woodhatch entrance, ground works and other associated works including tree removal, the demolition of an existing garage on the site, and the creation of a new egress point onto Cockshot Hill.
- 5 The proposals have been developed in consultation with the school. The key objective for the school is to create a suitable and modern learning environment for pupils to replace the existing accommodation at Reigate Priory, which due to its Grade I status is difficult to redevelop to the extent that would be required. The issues include *below standard* accommodation and accessibility issues. The school has become constrained by the current building. The current school has an Outstanding Ofsted rating and as such is over-subscribed. The new facility has been designed to be an appropriate size for the pupils' numbers and will continue to inspire pupils, providing state of the art facilities. The ambition of the school is to develop all aspects of children and to ensure learning inside and out.
- 6 An interactive project website (<https://www.surreycc.gov.uk/schools-and-learning/schools/strategiesplans-policies-consultations/reigate-priory-juniorschool/>) was launched **by the applicants** at an early stage in the consultation process (February 2022). A second public consultation was held in various locations in Reigate during 9-12 May 2022.

Site Description



- 7 The application site comprises the southern part of the wider Woodhatch Place site surrounding an existing large Headquarter Office building formerly occupied by Canon UK and located within the administrative boundary of Reigate and Banstead Borough Council, some 1km south of the edge of Reigate. The red line of the application site (as outlined in the aerial photograph above) extends to approximately

- 2.55ha (6.3 acres) of land, whilst the area of the school is 2.4ha (5.9 acres). The site is currently in the ownership of Surrey County Council and the existing office building is now used for most of Surrey County Council’s administrative functions following its relocation from Kingston.
- 8 Woodhatch Place comprises of open grassland with existing pond features and spinneys of woodland, having an inclined topography running from south to north with the incline becoming steeper towards the north of the site. In the centre of Woodhatch Place are the existing office buildings, the main building extending in part to 3 storeys in height and of modern design. South of the main office building is Woodhatch Lodge which is a locally listed building. This building is a two-storey 18th Century building which is finished in a whitewashed render and has a slate hipped roof design. It has a veranda to the rear with steps leading down to the open land to the south. The following photographs provide key views of the existing application site and its wider context and boundaries.



- 9 The gardens of the application site were subject to extensive landscaping during the development of the former Canon building now occupied by SCC and there are two ponds to the south of Woodhatch Lodge, one of which is manmade and formed part of the landscaping of the site associated with the planning permission for the former Canon office building. The site is designated as a Locally Listed Park and Garden. This designation covers all the application site and almost all of the wider site owned by SCC (except a NE corner adjacent to Smoke Lane). The site is also designated as Urban Open Space on the Development Plan. There is a band of trees bordering Cockshot Hill which are subject to a Tree Preservation Order (ref. RE717). The eastern boundary of the site also has mature trees and vegetation which screens the site from the properties facing on to Holly Road. The southern boundary of the site has some mature trees and vegetation which provides screening of the site from Angel Place. There is little in the way of any natural screening of the site from The Belvederes (residential development) to the south of the site.
- 10 Vehicular and pedestrian access to the site is gained via Cockshot Hill (A217) to the west of the site with the internal access to the existing car park passing behind the office building which lies to the east.
- 11 The site is located within the Urban Area of Reigate and is within Flood Zone 1 having a low probability of flooding. Immediately to the south of the application site are residential developments. The Belvederes is a residential development which is accessed via Hornbeam Road and comprises a part two, part three storey apartment building together with a pair of semi-detached dwellings near the entrance to the site. Further west is two storey detached dwellings fronting Angel Place which face west. To the west of the site is Cockshot Hill (A217), which has two storey detached dwellings front the western side of the road, with access gained via a lay-by road. Cockshot Hill has a number of residential cul-de-sacs to the west of it. To the east of the site are two storey terraced and semi-detached dwellings which front on to Holly Road. Between these dwelling gardens and the application site is a public foot path (Reigate Footpath 47) which runs from Smoke Lane to the north of the site to Hornbeam Road to the south.
- 12 The Angel Inn and Yew Cottage over 60m to the south of the site are Grade II listed buildings.
- 13 Use of or reference to the name "Woodhatch Place" above is in relation the present application site, being the Surrey County Council Headquarter Building, formerly the Canon site, on the east side of the Cockshot Hill. The original Woodhatch Place, a substantial 16th century mansion, stood on the west side of Cockshot Hill until 1786 when it was rebuilt, and then demolished subsequently in the 1960s, and only the 16th century garden wall survives on that side of the road at the entrance to the Nursery as well as the later 18th century Old Cottage.

Planning History

- 14 There is a significant planning history for this site listed on the planning register at Reigate and Banstead Borough Council. The applicant provided a useful summary of the key decisions made which is reproduced below (note: some descriptions are truncated).

Application Reference	Proposal	Decision
22/00067/CON	The construction of solar carports and associated works including LV cable route, self-contained building and associated infrastructure.	Planning permission granted by SCC under Regulation 3). Permitted May 2022
04/02279/F	New disabled access ramp to existing entrance. (Amended Description) (Drg No. 3309/50, 51, 53) Amended plans received on 4/11 to show details of provision of disabled access ramp. (Drg No. 3309/54)	Permitted 2 December 2004
00/04520/CU	Change of use to a day nursery. Amended plans received illustrating revised locations for play rear and parking area for the nursery.	Permitted 19 July 2000
00/02106/OUT	Erection of new health/leisure centre, together with 132 - parking spaces + 16 others accessible from Canon site. Amended to show main car access off a new entrance point in Cockshot Hill.	Withdrawn 1 July 2004
97/15840/F	Modification of previous consent RE95P/1368 for new part one / part three storey B1 (Office) building incorporating refurbished lodge, residential conversion of stables with storage and garaging, reversion of 2 cottages to residential use and parking for 552 cars.	Permitted 3 March 1998
96/04620/F	The gate house stable block/stationary buildings Cockshot Hill Reigate. Renewal of permissions 93P/142 and 90P/1364 for the change of use of Woodhatch Lodge for mixed recreational and residential purposes.	Withdrawn 7 June 1996
96/04600/OUT	Renewal of permissions 93P/137 and 90P/166 for the erection of part 2, part 3 storey b1 (business) building. Closure of existing entrance. Formation of new access to	Withdrawn 7 June 1996

	Cockshot hill. Provision of car park	
95/13680/F	Erection of Part 1, Part 3 storey Class B1 (Business) Building incorporating refurbished Lodge together with residential conversions, formation of New Access from Cockshot Hill and provision of Car Parking for 552 cars.	Permitted 10 June 1996
93/01420/F	Renewal of permission 90P/1364 for the change of use of Woodhatch lodge for mixed recreational and residential purposes. Change of use of dining building to provide changing rooms/bar/recreation area in connection with continued use of playing fields for recreational purposes. Provision of car parking for 40 cars with access off Cockshott Hill via entrance approved under planning permission RE90P/0137.	Permitted 19 April 1993
90/13640/F	Change of use of Woodhatch Lodge for mixed recreational and residential purposes. Change of use of dining building to provide changing rooms/bar/recreation area in connection with continued use of playing fields for recreation purposes. Provision of car parking for 40 cars with access off Cockshott Hill via entrance approved under planning permission RE90P/0166.	Permitted 28 February 1991
90/13630/F	Change of use of Woodhatch Lodge for mixed recreational/residential purposes. Change of use of dining building to provide changing rooms/bar/recreation area in connection with continued use of playing fields for recreation purposes. Provision of car parking for 40 cars with access off Cockshot Hill via entrance approved under planning permission RE90P/0166.	Permitted 28 February 1991

90/01740/OUT	Residential development of 48 dwellings.	Refused 5 December 1990
90/01660/OUT	Erection of part two part three storey b1 (business) building. closure of existing entrance. formation of new access to Cockshot hill and to hornbeam road. provision of car parking for 486 cars.	Permitted 31 October 1990

Environmental Impact Assessment

- 15 In addition to the above planning history the applicants sought a screening opinion under Regulation 6 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) – SCC Ref. 2022/0035 – on whether the proposal represented EIA development.
- 16 The opinion concluded that the proposal **DID NOT** constitute development for which an Environmental Impact Assessment was required for the following reasons:
- The total area of land that would be affected by the proposed development is c.2.4 hectares, situated within the wider Woodhatch site which extends to c.10.4 hectares. The proposed development site (2.4 hectares) does not exceed the 5 hectare size threshold set out in the nPPG as the scale above which EIA is more likely to be required for urban development projects. The application would not result in the provision of any additional commercial floorspace as the proposed facility would be used for educational and related community purposes.
 - The proposed development site is not located within or in close proximity to any of the categories of sensitive areas listed in Regulation 2 of the EIA Regulations. The closest such area of land is a Scheduled Monument ('Bowl barrow on Earlswood Common 20m south of Pendleton Road' Historic England List ID 1008052) located c.0.82 kilometres south-east. The construction and use of the proposed new school campus would not be expected to give rise to impacts on nearby sensitive areas of a type or scale that would warrant classifying the proposals as 'EIA development'.
 - The proposed development site is situated c.100 metres north-west of the Earlswood Common Site of Nature Conservation Importance (SNCI) and Local Nature Reserve (LNR), and c.120 metres south-east of the Lavender Sandpit SNCI. The construction and use of the proposed new school campus would not be expected to give rise to any direct or indirect impacts on the nearby SNCIs or LNR of a type or scale that would warrant classifying the proposals as 'EIA development'.
 - The proposed development site is situated 1.1 kilometres south of the Reigate Air Quality Management Area (AQMA), designated for oxides of

nitrogen (NO_x) concentrations. The proposed development would provide a new campus for a school currently located on a site in closer proximity (<0.1 kilometres) to the Reigate AQMA. The proposed development does not involve any change in the number of pupils (c.600 places) attending the school and is therefore not expected to significantly alter the number of vehicle movements associated with the operational use of the school campus. Construction phase traffic would be short-term and given the scale of the proposed development would be unlikely to result in significant additional HGV movements through the AQMA. On balance the proposed development is not likely to give rise to changes in air quality of a scale or type that would warrant classifying the scheme as 'EIA development'.

- The western boundary of the proposed development site is formed of a belt of trees that are covered by a Tree Protection Order (TPO) ref. RE717. The proposed development would involve the removal of a section of the woodland (c.1,413 square metres) covered by TPO RE717 to create a new egress point onto Cockshot Hill (A217). The construction of the new school buildings and associated sport and recreation facilities and other infrastructure would necessitate removal of c.7,833 square metres of established woodland. None of the areas of woodland that would be affected by the proposed development are classified as Priority woodland habitat or as Ancient Woodland. The information submitted in support of the screening opinion request indicates that any trees removed to enable the development would be compensated for, through habitat creation either elsewhere within the wider Woodhatch site or off-site if the former is not feasible. The construction and use of the proposed new school campus would result in direct impacts on areas of established woodland, but those effects would not be on a scale that would warrant classifying the proposals as 'EIA development'.
- Woodhatch Place is a locally listed park and garden of historic interest and Woodhatch Lodge is a locally listed building. The proposed development would have a direct impact on the park and garden and would impact on the context and setting of the locally listed building. The screening request reports that the southern part of the park and garden was subject to changes c.30 years ago as part of the redevelopment of the site by Canon (planning permission ref. 95/13680/F), which involved remodelling of the southern area and the planting of many of the trees that would be removed to facilitate the proposed construction of the new school campus. The historic interest and value of the southern part of the park and garden has therefore already been diminished as a result of the permission previously granted by the local planning authority and the proposed development would not result in significant effects on the heritage asset. The screening request indicates that tree planting would be provided along the northern part of the development site to screen views of the new school campus from Woodhatch Lodge. Such measures would minimise the impact of the proposed development on the context and setting of the locally listed building. Taking account of the fact that the heritage value of the park and garden has been compromised by previous development and that mitigation measures are proposed to address the impact on the context and setting of the locally listed building it is recommended that the scheme should not be classed as 'EIA development' on heritage grounds.
- The construction works could give rise to emissions of noise, however given the short-term and temporary nature of works, and the commitment to

implement a construction and environmental management plan, it is unlikely that such impacts would be significant. The use of the campus, including outdoor sports and play areas, could give rise to noise which could be a source of nuisance to nearby residents. The screening request indicates that the boundary between the school site and nearby residences would be fenced with 3 metre high acoustic timber panels to mitigate against significant noise disturbance. The screening request indicates that floodlighting would not be used with reference to the proposed sports pitches and that external lighting would be designed to avoid light spill affecting nearby residential properties. The scheme would not therefore be expected to give rise to significant nuisance impacts as a consequence of external lighting use. Taking account of the mitigation measures proposed and the scale of the facility it is recommended that the scheme should not be classed as 'EIA development' on noise or lighting disturbance grounds.

- 17 Following receipt of a representation received on the planning application the EIA opinion was further considered. The representation stated:

The Environmental Impact Assessment Screening Opinion Report 8.4.22 stated that this planning application does not require a full Environmental Impact Assessment because, as there is no change in number of pupils, it is "therefore not expected to significantly alter the number of vehicle movements associated with the operational use of the school campus.". The figures modelled by Velocity Planning indicate an increase in car use, significant enough to require mitigating measures. Has the requirement for an EIA been reassessed?"

- 18 The opinion concluded again that the proposal **DID NOT** constitute development for which an Environmental Impact Assessment was required for the following reasons:

- Table 5-3 'Anticipated Pupil Mode Share' (p.39) of the submitted TA reports that a change is expected in the number of pupils travelling to school by means of car compared with the current situation (i.e. school located at Reigate Priory) as represented in the findings of the 2021 school travel survey.
- The 2021 travel survey found that 29.8% (179) of pupils travelled to school by means of car. Table 5-3 reports that relocation of the school to the Woodhatch site would result in 52.7% (316) of pupils travelling to school by means of car. In order to evaluate the significance of that change with respect to whether it would be of a scale that would trigger EIA it needs to be considered in the context of background traffic on the affected road network.
- The link most directly impacted by the relocation of the school to the Woodhatch site is the A217 Cockshot Hill. Background average daily movements traffic data for the affected section of the A217 Cockshot Hill from the Department for Transport's road traffic statistics website (<https://roadtraffic.dft.gov.uk/manualcountpoints/26801>) for the last available 5-year period (2017 to 2021) is set out below.

Year	All Traffic - Movements per day	All Traffic (30%) - Movements per day	All Traffic (10%) - Movements per day	Cars - Movements per day	Cars (30%) - Movements per day	Cars (10%) - Movements per day
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2021	14,170	4,251	1,417	11,743	3,523	1,174
2020	12,901	3,870	1,290	10,659	3,198	1,066
2019	16,644	4,993	1,664	14,033	4,210	1,403
2018	16,497	4,949	1,649	13,859	4,158	1,386
2017	16,632	4,990	1,663	14,013	4,204	1,401
5 Year Average	15,369	4,611	1,537	12,861	3,858	1,286

- Based on the information set out in the submitted TA, the total daily vehicle movements associated with both pupils and teachers travelling to and from school by car would be 728 movements per day.
- The IEMA guidance on the consideration of road traffic impacts in EIA advises that a change in traffic of 30% or above on an affected road link would trigger the need for detailed assessment through the EIA process.
- The IEMA guidance also advises that for "specifically sensitive areas" - examples given include accident blackspots, hospitals, conservation areas inter alia - a change in traffic of 10% could be sufficient to trigger a need for detailed assessment through the EIA process.
- The personal injury accident review data set out in the submitted TA does not indicate that the affected section of the A217 Cockshot Hill could be considered to be an accident blackspot. The northern part of the affected section of the A217 Cockshot Hill does fall within the Reigate Town Centre Conservation Area and the proposed development is for the siting of a school on land accessed from the road, which could be considered to be a sensitive use, and it is therefore appropriate in this case to use the 10% threshold recommended by IEMA to determine whether the change in traffic associated with the development is of a scale that would trigger a need for detailed assessment through EIA.
- The 5-year average for all traffic is 15,369 movements per day, 10% of that figure is 1,537 movements. The relocated school is expected to generate 728 movements per day, which accounts for a 4.7% increase in terms of all traffic on the affected section of the A217 Cockshot Hill.
- If only movements of cars are considered, the 5-year average is 12,861 movements per day, 10% of that figure is 1,286 movements. The relocated school is expected to generate 728 movements per day, which accounts for a 5.7% increase in terms of car traffic on the affected section of the A217 Cockshot Hill.
- As the change in traffic on the affected section of the A217 Cockshot Hill would not exceed the 10% threshold recommended by IEMA the earlier conclusion of the County Planning Authority that EIA is not required for the proposed scheme remains valid. The development proposed under Planning Application ref. RE22/01796/CON is not EIA development. The adopted EIA screening opinion does not need to be updated.

The Proposal

- 17 Planning permission is sought for the erection of a part two, part three storey building to provide a 5 FE junior school, with two all-weather sports pitches, a MUGA pitch, a hard play area with netball court, and provision of car parking spaces and provision of a new internal access road with a new egress point on to Cockshot Hill, with associated hard and soft landscaping. The proposed building would have a rectangular footprint and would be located to the south of the site orientated so that the long elevations face west and east.
- 18 The school building would measure 77.39 metres in length and 22.9 metres in width at its widest part and would have an overall height of 12.7 metres. The part 2 storey element would have an overall height of 7.63 metres. The building would have a flat bio solar green roof, and a solar panel array would be located on the roof space to provide onsite renewable energy.
- 19 The main entrance to the building would be located on the western elevation with doors providing access to the classrooms and circulation spaces provided along both the west and east elevations. The east northern 2 storey section of the building. The classrooms and teaching spaces and ancillary spaces would be located in the southern 3 storey element of the building and would be arranged with the year groups being located on the same floor and same areas of the buildings.
- 20 The school building would be finished in a buff brick for the 2 storey element and the ground floor of the 3-storey element with the upper floors of the 3 storey element being finished in cladding in the school colours of red and white with grey stripes.
- 21 In terms of landscaping, final details of this are yet to be agreed but the plans indicate that the building would be surrounded by hardstanding and paving to provide play space and a path for wayfinding. To the north of the proposed school building would be an outdoor netball court, and further north a MUGA sports pitch is proposed which would be enclosed by 2.5 to 3 metre high fence. East of these pitches an all-weather artificial grass play space is proposed. This would have the ability to be marked out with sports pitches but would be installed as a play area from the outset. Northeast of the all-weather play areas, a wooded outdoor learning area is proposed to provide a natural learning space which would also provide opportunities for ecological enhancements.
- 22 Vehicular access would be gained from Cockshot Hill via the existing access to the wider Woodhatch Place site. A new internal access road is proposed which would run from the existing access to a new egress point proposed south of the existing access. New car parking spaces would be located south of the existing access and to the west and east of the internal access road. Disabled parking spaces and 2 minibus spaces would be located in front of the school building.
- 23 A new pedestrian access is proposed from the east of the site leading to the public footpath to the east of the site and to Hornbeam Road. Cycle parking is proposed near to the pedestrian access to the east, as well as in front of the main school building. A total of 92 cycle and scooter parking spaces are proposed.
- 24 Following discussions with Surrey County Council, highways improvements are proposed to Cockshot Hill. These improvements would involve changes to the kerb arrangements to the existing access to the site and new tactile paving and guard rails. A new uncontrolled crossing point is also proposed to Cockshot Hill which would provide a refuge island in the centre of Cockshot Hill and tactile paving. The

proposed egress point would include tactile paving for pedestrians. Other improvement would be provision of 'School Keep Clear' markings (a more detailed commentary on the proposed highways improvements is provided in the Highways section of the report below).

- 25 The school site would be enclosed to the north, east and western boundaries largely by a 2.4 high wire mesh fencing. In parts there will be 3-metre-high timber acoustic fence, namely along boundaries adjacent to the main part of the school building both to its west (fronting Cockshot Hill) and to its east (facing The Belvederes residential development).
- 26 A new substation would be provided to the south of the proposed egress with a bin store proposed to the north of the egress point.

Consultations and publicity

Consultees (Statutory and Non-Statutory)

Reigate & Banstead Borough Council	<p>Raise Objection on grounds relating to:</p> <ol style="list-style-type: none"> a) loss of urban open space b) harm to the setting of heritage assets c) scale and design harming the character and appearance of the area. d) increase in traffic and congestion. <p>Considered that there are options for adaptation, extension, and redevelopment of the existing Reigate Priory Site.</p> <p>Request SCC to robustly assess the impacts upon the amenities of neighbouring properties to ensure that they do not suffer from adverse noise, light pollution, or overbearing impacts.</p>
RPS (Noise)	<p>Requested additional information in the form of a noise impact assessment for traffic and use of artificial pitches. Requested conditions regarding Construction and Plant Noise</p>
Landscape Officer	<p>Makes detailed comments on the impact of the proposal and concludes that it will give rise to a degree of harm.</p>
Historic/Listed Buildings	<p>Assessed the proposal in accordance with paragraphs 195 and 199 of the NPPF and under paragraph 203 there will be harm to the setting of Woodhatch Lodge and Woodhatch Park. Taking a balanced judgement for the significance of these assets and the degree of harm, consider this to be significantly outweighed by the benefits of the proposal.</p>
RPS Lighting	<p>The applicant has submitted all the information</p>

we would expect to see to assess the proposed lighting scheme. The scheme is designed in accordance with the local environmental zone and off-site light spillage and nuisance glare has been avoided by the appropriate choice of luminaire and setting out.

SuDS & Consenting Team	Requested amendments. No objection subject to conditions/informatives
Archaeological Officer	Requested a Written Scheme of Investigation which the applicants provided. No objection subject to a condition.
County Arboriculturalist	Proposal causes harm as a high number of trees are to be removed but can be partly mitigated with high quality replacement planting. Requests a number of conditions
Rights of Way	Public Right of way Reigate Footpath 47 runs alongside the application area. Although the route is separated by a hedge and there is unlikely to be any major impact on the path it should be recognised that the route could be used as an important off-road access for pupils from the east and north. We would suggest the surface is improved and vegetation is cleared. The path runs over land in Surrey County Council's ownership so it would be in the council's gift to dedicate higher public rights on this footpath to allow cycle use-again to provide a safe off-road link to the school. This would require widening and surfacing as required and a legal order to change the status of the footpath.
RPS Planning & Dev Ltd - Air Quality	No objection
Transport Development Planning	No objection subject to conditions and informatives
Surrey Wildlife Trust - Ecology	The project cannot demonstrate a biodiversity net gain of at least 1% through a biodiversity metric, although proposals have been provided to enhance existing and off-site habitats. In the absence of secondary legislation of the Environment Act (2021), the project should be assessed on a planning balance, based on existing national and local planning policy, such as the National Planning Policy Framework (2021). Paragraph 174 of the National Planning Policy Framework (2021) states "Planning policies and decisions should contribute to and enhance the natural and local environment by....

- 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”.

Summary of publicity undertaken and key issues raised by public

- 27 The application was publicised by the posting of four site notices and an advert was placed in the local newspaper. A total of 675 owner/occupiers of neighbouring properties were directly notified by letter. 293 responses were received as a result of this publicity, 293 raise objection, 7 express support and 14 make comments. Some of the representations received represent groups of people (e.g., Holmesdale Priory Parents Group, Woodhatch Green Spaces Preservation Group and Reigate Liberal Democrats). A proportional summary of the main points raised in the representations is provided below.

OBJECTIONS

1. Broadhurst Gardens, Lime Close, Vogan Close, Holly Road, Blackthorn Road, Hazel Road, Juniper Road, Hornbeam Road, Sycamore Walk and Whitebeam Drive not suitable for drop off.
2. Feeder schools are a long walk away
3. Hornbeam road is a busy road already
4. The traffic in Reigate is already severely congested at times, moving the school here will cause significantly more delays and higher amounts of CO2 emissions being dispelled into the area
5. The proposal encourages hundreds of extra cars to come and 'park and stroll' in nearby neighbourhoods.
6. The Reigate Baptist church already creates a problem for local residents by taking spaces, parking on verges (Hornbeam Road) and blocking driveways, this proposal will replicate this every day of the week except Saturday.
7. More car-parking spaces for pick-up and drop-off should be included on the school site.
8. Cockshot hill is already a very busy road and by relocating the Priory school to the Canon site this will significantly add to traffic levels at certain times of the day to a dangerous level.
9. The location of this proposed school move will push many parents into extra car journeys (even as the council advertises the benefits of walking)
10. Pollution will increase proportionally to the traffic which is completely contrary to goal of pollution reductions from the Council.
11. Effect on listed building. The application does not properly consider the effect of the proposed move on the existing Priory building, which is Grade 1 listed and for which there appears to be no plan for future use. (**Officer comment:** The existing Reigate

Priory site is not part of this planning application and not in the vicinity of the application site therefore it is not required as part of this application to assess any implications, heritage or otherwise, of this proposal on that building)

12. The development does not minimise distances within the local community and will result in materially more difficult traveling arrangements for many families.
13. The scheme absolutely does not facilitate active healthy travel arrangements or reduce car dependency - all the feedback from parents at the school is that it will do precisely the opposite.
14. The existing school is located in a safe area with minimal risk to children walking to and from school. Any children who continue to walk to the new building will do so along an extremely busy road with narrow pavements.
15. The proposal to make changes to the kerb arrangements to, provide guard rails and a refuge island in the centre of Cockshot Hill, and provide 'School Keep Clear' markings are insufficient to mitigate the risk from routing 600 children up and down a busy road twice daily.
16. Bell Street is already extremely congested.
17. Surrey County Council has already removed a very significant number of trees since it bought the Woodhatch site. The proposals will result in further reduction of trees and building or hard surfaces over much of the site.
18. Surrey County Council asserts that the current school building is no longer fit for purpose however the supporting documentation provides little evidence (**Officer comment:** an adequate and proportionate amount of information substantiating the decision to move this school from the existing site has been submitted with the application)
19. Whilst road width reduction is good for reducing speeds, regular cyclists using Cockshot hill are subjected to dangerous close passes on a constant basis.
20. No safety rails should be used as these are danger to cyclists
21. The cladding being red looks out of context with local buildings. suggest alternative finish to the building to be in keeping with area eg stone, tile.
22. The narrow pavements are dangerous for young children on bicycles
23. This site is totally the wrong location for the catchment it serves.
24. Canon is a large enough site that everyone can park there or drop off there, it's unnecessary to suggest using local roads (**Officer comment:** the application site is only a small part of the former Canon site and the existing parking on site is required to be available for use in connection with the continued use of the existing building by SCC)
25. The new school boasts it will be a green school but it's location will actually cause the percentage of walkers to the school to go from 80% walkers to 20% walkers.

26. The impact on the shops and small businesses that used to be well served by the many parents and staff walking through the town will not be visited
27. A more central location or one with parking could be found (**Officer Comment:** the applicants have undertaken research on alternative available sites within the vicinity and this has been submitted with the application. None of these are considered to be more suitable than the proposed site).
28. The design of the building is ugly
29. The old Reigate fire station was considered as an alternative site, which feels much more appropriate. (**Officer comment:** it is proposed that this site continues in its present use as a fire station and training grounds. It is also designated Conservation Area and Urban Open Space.)
30. There seems to be no sufficient evidence for declaring the existing site unfit - or at least no sufficient evidence that made it into the public domain. SCC says the DfE said so - but where is the evidence? (**Officer comment:** The Department of Education has written a letter confirming their support for this proposal – see under **SUPPORT**)
31. SCC provides a minibus from Reigate station to the site for their own employees as it's deemed to be too far to walk for adult legs, it would also be too far to walk for children on a daily basis.
32. The proposals will result in a significant reduction of trees.
33. Loss of privacy and overshadowing: From the drawings provided in the application, it is clear that the proposed building would sit very high in the environment and will overshadow and lead to considerable loss of privacy for residents of The Belvederes. The provision of a 3m fence on the boundary will do little to mitigate this. (**Officer comment:** this matter has been fully considered and it is set out in detail in the committee report under the *Impact on Residential Amenity* section)
34. Noise: with a new access footpath proposed right next to the northern boundary of the Belvederes, and development of sports pitches and playing area, residents of the Belvederes will suffer a significant increase in noise, with hundreds of young children outside close to residential properties. The use of the sports pitches by the public outside school hours will also significantly increase noise and lack of privacy well beyond school hours. As the ground to the north of the Belvederes will be elevated, a 3m acoustic fence will be of limited value, especially to those living on the 2nd floor of the Belvederes (**Officer comment:** this matter has been fully considered and it is set out in detail in the committee report under the *Impact on Residential Amenity* section the use of the all-weather pitch will be confined to school use only)
35. The pavement on Cockshot Hill is very narrow in places, and bounded by a stone wall making it expensive to consider widening.
36. The western boundary of the Belvederes has a number of Ash trees (within the Belvederes grounds). How will the root system of the Belvederes trees be protected? (**Officer comment:** A planning condition will ensure appropriate tree protection measures are undertaken prior to the commencement of development)

37. The application does not include provision of either a roundabout or traffic lights to accommodate the number of cars which will be utilising the auxillary/service road exit on Cockshot Hill, which exits onto the A217 between Broadhurst Gardens and Lime Close.
38. The phasing of traffic lights at The Angel already results in jams to the top of Cockshot Hill.
39. Due to the extremely tight turn onto this service road, large lorries, delivering to both the plumbing merchant and the Cooperative Food store already create significant traffic jams. School parking will exacerbate this
40. The proposal as a whole reduces the amount of urban green space. Even the sports pitches are artificial
41. Woodhatch Lodge is a locally listed building. The landscaping of the site was associated with the planning permission for the construction of the former Canon Building, to complement the views from and of Woodhatch Lodge. This new planning proposal totally changes this.
42. School building shapes the future. A long-term perspective is essential. The community needs a school building that it will be proud of in 30 years' time, as much as now. This proposal is mundane, orthodox, and uninspiring.
43. In respect of the "Alternative Site Assessment in Reigate for Reigate Priory School" document no consideration is given to changing the use of the existing Reigate Priory Junior School site.
44. The area to the east of the proposed school site can be subject to surface water flooding. On "clay soil" little water will soakaway. (**officer comment:** this has been considered as summarised in the *Drainage Implications* section of the report)
45. The building design is described as "playful" by the architects. The appearance is that of a standard office block rectangular box. Like a couple of Lego bricks but not playful as such. In fact, joyless shape and form that isn't inspiring to a young generation
46. Improvements to public transport facilities, including existing bus infrastructure/passenger facilities needs to be part of the proposal.
47. The medical emergency services frequently use the Cockshot Hill the main A217 to access the M25 motorway. Road traffic impediments caused by the proposed development can be an additional hold-up risk for transport to and from East Surrey Hospital.
48. The pedestrian refuges provided on the main road, A217 can easily become full. An additional hazard exists when drivers approach at speed from the south since visibility of the pedestrian refuges is poor
49. The proposed site is a long-standing green Urban Open Space within the town boundaries. The proposal will reduce the area's green spaces.

50. The proposed site is adjoining a small area of Ancient Woodlands (CS2; NHE3). Green spaces facilitate the movement of wildlife throughout the area. The loss of interconnecting green space will have a negative impact on this movement along the Wealden Greensand ridge.
51. Ground source heating is not included in the proposal. This seems short-sighted given the long life the school is likely to have ahead.
52. If this planning application passes at committee, at least 5 acres of land needs to be returned to a good biodiverse condition and protected to compensate for the loss of Woodhatch park and gardens open green space.
53. The Ecological evidence submitted to support the planning application demonstrates that the site provides a wide variety of ecological benefits, and habitats.
54. Reptiles, bats, breeding birds and certain habitats as biodiversity features within the site could be ADVERSELY IMPACTED during clearance, construction and operational phases of the Proposed Development. (**Officer comment:** This is addressed in the report below)
55. The proposal will result in a significant loss of habitats, and trees and significantly change the landscape, environment and ecology, measures needed to achieve the required 10% net biodiversity gain are significant. (**Officer comment:** Development Plan policy does not require a 10% gain. This is covered in the report below)
56. The parameters used to assess the sites identified are functional and make no assessment of the suitability of the site for the community the development will serve. The analysis fails to provide any definition or methodology that are necessary to support consistent application of the set parameters.
57. The Statement of Needs analyses the current accommodation against the guidance set out within BB103 "Area Guidelines for Mainstream Schools". This guide should be applied flexibly. It is not a rigid set of requirements.
58. The educational need statement fails to acknowledge that that school provides an outstanding education within the currently available space.
59. The educational need statement fails to provide any additional evidence (either here or within other supporting documents) that delivery within the available space is detrimental to the children's education.
60. The statement notes concern in relation to the public right of way and use of the playing fields in the park for sports pitches at the existing school. Whilst the statement recognises that the risks posed through both of these are mitigated by the actions of the staff it fails to recognise that solutions were put forward to overcome the right of way. There is no analysis of these nor why they have been discounted as a solution. (**Officer comment:** Reigate Priory Junior School previously tried to object to the Public Right of Way and have this closed but following a Planning Inspectorate review in 2015 the Order was confirmed, and the school were subsequently required to comply with it and the respective planning conditions to maintain the Right of Way)

61. The benefits of current school's access to the playing fields in the park that are significantly in excess of the facilities on the proposed site are not analysed in the educational needs statement.
62. The educational needs statement has no comparison on the risk of safeguarding issues in the park, versus the increased risk of walking along the A217.
63. The educational need statement notes an average annual spend of c£300k with a projected spend, without "drastic intervention" of £20m over a 20-30 year period for the current school. No detailed analysis is provided that supports the figures quoted.
64. The Noise Survey states that daytime average sound pressure levels at the proposed school site is over 70dB, largely as a result of the traffic on the A217. This is above WHO Environmental Noise Guidelines
65. No discussion or analysis is presented of the option of two smaller junior schools, within walking distance of their pupil communities. Smaller schools would not require an area of 5 acres for site assessment.
66. The footpath to the east of Woodhatch Place from Smoke Lane to Hornbeam/Holly Road is not suitable for buggies, or anyone with limited mobility. It is dark amongst the trees, and steep, with steps that are difficult even for the able bodied, especially in wet weather.
67. The lack of pickup and drop off spaces leading to cars parking in nearby residential roads will cause significant delay and inconvenience for residents of neighbouring streets, as well as delays to through traffic and buses
68. I have raised objections at both of the consultations held but they have not been listened to or taken into account in the proposal
69. Siting the grass pitches immediately adjacent to The Belvederes, separated by a fence will cause significant noise impact upon residents.
70. The height of the ground and building of the school creates significant issues of overlooking to residents of The Belvederes.
71. Siting storage sheds and cycle parking immediately adjacent to The Belvederes will create an unacceptable level of noise to residents of The Belvederes
72. The creation of a pedestrian entrance in Hornbeam Road will cause a significant increase in traffic volume, noise, parking and pollution to residents of The Belvederes.
73. Siting of the school creates a significant flood concern to The Belvederes.
74. We are deeply concerned about the loss of privacy from the proposed All Weather pitches, the Hornbeam Road pedestrian entrance and the Site Access route located immediately to the south of the proposed retaining wall - starting at the Hornbeam Road pedestrian gate and heading towards the school building to the west.

75. The difference in level between 1 & 2 The Belvederes and the pedestrian route and All Weather pitches to the north of the weld mesh fence will further allow for easy overlooking (**Officer comment:** Conditions are suggested covering this issue)
76. After reviewing the Acoustic Report and the External Noise Survey Report included in the Planning Application we believe they both fall well short of a thorough assessment of the acoustic impact on The Belvedere residents.
77. Sport England Design Guidance Note recommends the entrance and access route should be located away from nearby housing
78. The assessment does not consider the potential active use of the All Weather football pitches and the pedestrian entrance beyond normal school hours - especially into the evenings and weekends - and most likely by groups of adults unconnected to the main educational purpose of the school. (**Officer comment:** use will be restricted to the school and this will be covered by a planning condition)
79. The assessment also does not consider the nuisance noise arising from the ball striking the weld mesh fence - which is also going to increase the noise levels for all The Belvedere residents.
80. The assessment does not consider the increase in the noise levels caused by the additional car and pedestrian traffic generated by the school entrance on Hornbeam Road.
81. Any permission should restrict the use of the All Weather pitches and the pedestrian entrance to school hours and prevent their use into the evenings and weekends

COMMENTS

1. Fully support the provision of the internal access road and car spaces - as am very worried about cars parking all over nearby roads twice a day.
2. Surrey County Council as the local education authority and the highway authority for the Reigate's local road network wears several hats in respect of this planning application. Residents' concerns have been expressed that managerial and political influences may affect the objectivity and transparency required to fairly access this planning application (**Officer comment:** Regulation 3 of the Town and Country Planning General Regulations 1992 requires that Surrey County Council determines the application. It states *an application for planning permission by an interested planning authority to develop any land of that authority, or for development of any land by an interested planning authority or by an interested planning authority jointly with any other person, shall be determined by the authority concerned, unless the application is referred to the Secretary of State under section 77 of the 1990 Act for determination by him.* Planning officers are separate to the application team and will assess the application in the same way as any application having regard to the provisions of the Development Plan and other material considerations).

SUPPORT

1. In favour of the new school plans. Although a relocation is not ideal it is necessary and the proposed location for the new building makes as much sense as any.

2. The occupants of our property, that adjoins the proposed site, are in full support of the relocation of Priory School.
3. The upgrade of Cockshot Hill for improved pedestrian access is welcomed and was a primary concern in terms of safety. This also adds value to the local area as the current walkway is not ideal.
4. Alternative access via Hornbeam Road (either pedestrian or vehicle) is also welcomed.
5. The plans look well thought out and practical with little need for compromise from the previous location.
6. The **Department for Education** has written an unsolicited letter in support of this proposal which states:

We write to confirm that the Department for Education (DfE) agrees to fund the new build of Reigate Priory Junior School on the basis of the business case provided by Surrey County Council in May 2022. The addressing of condition need for Reigate Priory Junior School is under the Priority School Building Programme (PSBP). In regard to the use of programme funding, the remit of the Priority School Building Programme (PSBP) is to replace or refurbish schools with very poor building condition at one or more of the buildings. The methodology for the second round of the Priority School Building Programme (PSBP2) is available at Department for Education (publishing.service.gov.uk). The DfE is satisfied that Surrey County Council's proposals fully meet the criteria of PSBP to provide a purpose-built school with up-to-date facilities on a site which is designed for education. The DfE has already approved the outline business case for the submitted scheme at Woodhatch Place and will confirm the release of funding following the granting of planning permission.

Planning considerations

Introduction

- 28 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.
- 29 In this case the statutory development plan for consideration of the application consists of the Reigate and Banstead Local Plan: Core Strategy 2014 and the Reigate and Banstead Local Plan (Development Management Plan) 2019. In considering this application the acceptability of the proposed development will be assessed against relevant development plan policies and material considerations. In that assessment it will be necessary to determine whether the proposed measures for mitigating any environmental impact of the development are satisfactory.

EDUCATIONAL NEED/ALTERNATIVE SITE ASSESSMENT
Reigate and Banstead Core Strategy 2014
Policy CF12: Infrastructure Delivery
Reigate and Banstead Development Management Plan 2019
Policy INF2: Community Facilities

30 Paragraph 95 of the National Planning Policy Framework states the following:

'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local 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:

a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and

b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'

31 Core Strategy Policy CS12 states' inter alia, that the Council will (in point 3) *encourage proposals that will increase the range, improve the quality, or enhance the accessibility, of community and leisure facilities in the borough.*

32 Development Management Plan Policy INF 2 amplifies Core Strategy Policy CS12. It states that proposals for the provision of new community, sports and recreational facilities will be encouraged provided: a. There is an identified local need which cannot be met from the use of the existing stock of community premises b. The site would be easily and safely accessible to the local community; and c. The proposed development would have no adverse impact on residential amenity or character of the area.

Educational Need

33 As the statutory and strategic commissioner of educational provision, effective pupil place planning is an essential process that enables Surrey County Council (SCC) to work with schools and stakeholders to commission and create high quality school places. To deliver this strategic role in an open and transparent way, a set of clear school organisation principles underpin the approach and include ensuring Surrey provide sufficient school places for Surrey residents who require them and maximising the options for parents.

34 The Education and Inspections Act 2006 increased the strategic role of local authorities as champions of pupils and parents, and a duty to act as commissioner of school places, rather than the sole provider. The main legislation governing school organisational changes is found in sections 7-32 of the Education and Inspections Act 2006, as amended by the Education Act 2011.

35 Reigate Priory School is a junior school for pupils aged 7 to 11 years and has a published admission number (PAN) of 150. Reigate Priory School is a community school, and the admission arrangements are the responsibility of Surrey County

Council. Every year Surrey County Council consults on the admission arrangements for all community schools.

Local Need

7

- 36 Reigate Priory Junior School is one of three mainstream schools providing for pupils aged between 7 to 11 of age. Reigate Priory Junior School is an established and very popular school within the local community. Reprovision of the school only 0.7 miles away allows the two local infant schools, Holmesdale Infant School and Dovers Green Infant School, to remain feeder schools to Reigate Priory Junior School. Reigate Priory Junior School has a capacity of 600 places across National Curriculum Year (NCY) 3 through to NCY 6. Table 1 below shows the numbers on roll in each year group at the school over the last three years. Pupil numbers are consistent and reflect the popularity of the school.

	Year 3	Year 4	Year 5	Year 6	Total
October 2021	144	149	148	148	589
October 2020	146	150	149	149	594
October 2019	148	150	149	150	597

Table 1

- 37 The agreed admission criteria for September 2023 will be to keep priority for admission based on the proximity of the child's home address to the existing school site. Rather than use the school gates (which may no longer exist) measurement will be from the main front door of the building in Priory Park, Reigate. This will mean children living nearer to the existing school site will still have greater priority. This will ensure that the intake to Reigate Priory for 2023 will be unaffected by the move of school site. For 2024 and beyond it is currently Surrey County Council's intention to continue with this same admission criteria, however these arrangements must be determined and confirmed every year. If SCC did have plans to change the admission criteria, they would need to run an additional consultation with the community.
- 38 The Department of Education (DoE) has included Reigate Priory Junior School on the Priority School Building Programme 2 as a school whose accommodation does not meet the DoE standards and is not 'fit for purpose' for educational purposes. The programme targets UK schools in need of being rebuilt or refurbished and envisages that these modified schools would open as soon as possible.
- 39 The school is located on Bell Street in Reigate, within the bounds of Priory Park, and has enjoyed many years in its current historic building. However, the building needs regular and substantial ongoing maintenance. The school is made up of two main buildings, an historic core with additions, and a separate 1950's block. The core of the building is of considerable historic value, being both a Scheduled Ancient Monument (in parts) and Grade I listed property. This building sits predominantly within the surrounding park landscape which is also statutorily listed. The 1950's block sits at the boundary of the park land separated from the historic core by a public right of way running between the two buildings. The existing school buildings and site have a number of issues that make the site unsuitable for ongoing use as five form entry junior school, in the current arrangement. These generally consist of the following four categories:

1. Accommodation Whilst the overall gross floor area of the existing school exceeds the minimum recommended for a 5FE Junior School, there are a number of

areas where the existing accommodation is unacceptable when reviewed against Building Bulletin 103 (BB103) Area Guidelines for Mainstream Schools. It should be noted that under providing space is unacceptable according to BB103, but equally in some instances overproviding is also unacceptable. The main areas of deficiency in the existing school buildings are the classroom accommodation and the catering/dining facilities. In relation to the catering facilities, the existing school kitchen is significantly undersized and unable to deliver anything like 600 meals per day. The existing kitchen is only 25m² where a school of this size should have a circa 70m² kitchen. Equally the adjacent dining hall in the existing school is only 85m², whereas this should be 150m², and even at this size, for all 600 children to eat a hot meal would require 4 sittings. With regard the classrooms at the existing school, there are currently 23 classrooms, including specialist areas, which is correct, however, it is the size of these classrooms that is not in line with BB103. BB103 requires junior age classrooms for groups of 30 children to be 55m² for new accommodation and allows for an adjustment of $\pm 10\%$ on this for existing accommodation being refurbished. As such classrooms under 49.5m² and classrooms over 60.5m² are considered to be equally unacceptable. Of the 23 classrooms in the existing school, only 8 are within the acceptable size range of $\pm 10\%$ of 55m². Of these 8, 5 are less than the target size and 3 are over. There are 7 classrooms that are under this lower limit, with the smallest being just 37m². There are also 8 that are over the upper limit with three of these exceeding 80m². Only 35% of the existing classrooms are within the acceptable range of classroom sizes. 35% of existing classrooms exceed the maximum classroom size and 30% fail to achieve the required minimum classroom size.

2 Safeguarding There are two key areas of safeguarding concern with the current site and arrangements. These relate to the public right of way (PROW) through the school premises, which splits the site in two, with buildings on both sides, and the use of Priory Park as the sports pitches for the school. When the school achieved its outstanding Ofsted rating in 2012, this was using a previous assessment framework. The current assessment framework requires a much greater level of scrutiny over the risk of unauthorised access to the site, accommodation and the access of members of the public to the pupils. Whilst the school currently do a fantastic job in managing these risks, it is not certain that the school would be able to achieve an outstanding rating in the current location, if assessed under the new framework. The management of these safeguarding risks also requires significant effort and resourcing from the school staff, which would be better spent on things that directly benefit the children.

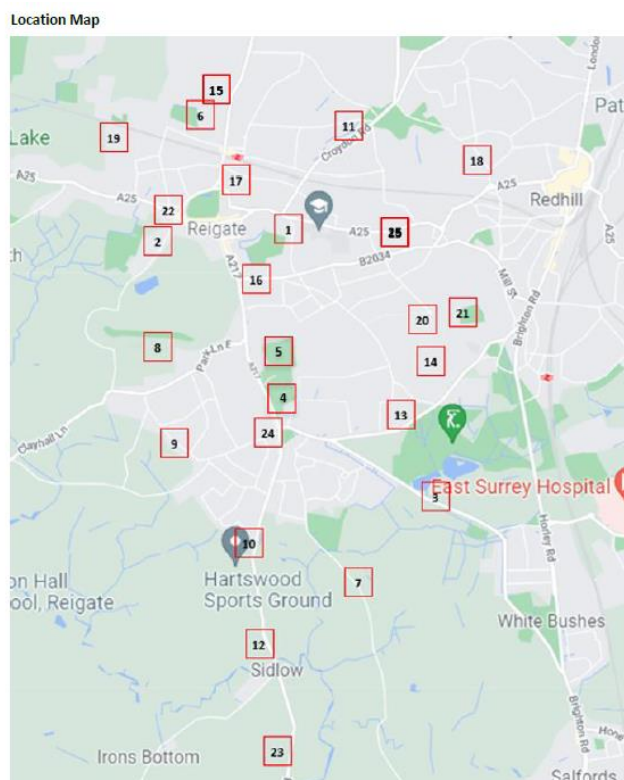
3. Maintenance Whilst there are many benefits and privileges associated with occupying an 800-year-old building with such significant heritage and history, there are also many side effects. The maintenance of the building saw average annual costs to Surrey County Council of £296,645.00 since 2013. This not only has a huge impact on Surrey's budgeting, taking money away from other school maintenance needs, it also has a huge impact on the school, who must accommodate this level of maintenance work on a continual basis. The closing of spaces to allow works to progress, dealing with disruption from the noise and inconvenience of works and the increased issues around safeguarding all burden the school on a perpetual cycle. It is also clear that despite this level of expenditure within the school, the buildings still have significant maintenance needs and without drastic intervention, this annual spend is expected to continue and indeed increase, with estimated expenditure over a 20-30 year period exceeding £20m if the school were not to move. The anticipated comparative cost based on the average buyback cost within Surrey schools would be circa £15,000 per annum.

4. Building Listing and Heritage status The DfE identified the significant condition need at Reigate Priory Junior School in June 2015 with a feasibility process following that, which considered all possible solutions to the condition need identified at the school, including refurbishment or additional developments on site. A wide range of surveys were undertaken as part of that process alongside the development of a presentation to the planning and conservation officers at Reigate and Banstead Borough Council as well as representatives of Historic England, which was delivered via a planning pre-application meeting held on the 9th of October 2020. This planning pre-application meeting effectively concluded that it would not be acceptable to develop the existing site due to the significant harm that would be caused to the designated heritage assets at Reigate Priory. The DfE's feasibility study concluded that the options for developing onsite would not meet the condition need as they were either not deliverable or not economically viable. Whilst the DfE's involvement was condition driven, they would also ensure that remodelled, refurbished, or extended accommodation meets BB103 requirements, which would have required them to rationalise the classroom spaces identified above as either failing meet or exceeding the acceptable size range for a classroom in a Junior School. This type of work cannot be carried out where it would impact on heritage assets, such as those abundant at Reigate Priory.

- 40 By not relocating to a new site the ongoing cost of continued maintenance of the existing building and grounds would make the retention of the school at the site become increasingly unviable. Therefore, the retention of the school at the existing site had to be discounted for these reasons. Reigate Priory School itself has expressed support for the proposals recognising it will be a challenge but one that will bring added opportunities and benefits for its pupils whilst ensuring the school retains its unique identity.
- 41 Given the inadequacies of the existing school site, the search for a new site for the school commenced a number of years ago in the local area. A document entitled '*Alternative Site Assessment in Reigate for Reigate Priory School*' was submitted with the planning application which provides an overview of the sites which have been identified over the years.

Alternative Site Assessment

- 42 This states that any alternative site would need to:
1. Be greater than 5 hectares in size
 2. Be within the built-up area of Reigate
 3. Be within 2 miles of the existing school
 4. Have good road access
 5. Be available, achievable and deliverable
- 43 26 sites were identified and their location is indicated on the map below.



- 44 Of those 26 sites, 25 met criteria 1 to 4 above but only one, Woodhatch Place South, also met criterium 5, as summarised in the table overleaf.

Site	Available	Achievable	Deliverable
1. Land west of St Mary's Preparatory and Choir School, RH2 7RN	No	No	No
2. Reigate Rugby Club and Land west of Park Lane, RH2 8JX	No	No	No
3. Land east of Lonesome Lane, RH2 7QH	No	No	No
4. Land south of Woodhatch Place, RH2 8EF	Yes	Yes	Yes
5. Land north of Woodhatch Place, RH2 8EF	Yes	No	No
6. Site west of St Albans Road, RH2 9LN	No	No	No
7. Land north of Courtyard Business Centre, RH2 7QT	No	Yes	No
8. Shepherds Lodge, Park Lane, RH2 8LA	No	No	No
9. Land south of Sandcross Primary School, RH2 8HH	No	Yes	No
10. Land at Hartwood Sports Ground, 160 Dovers Green Road, RH2 8BY	No	No	No
11. Surrey Fire & Rescue Site, Wray Park Road, RH2 0EJ (entire site)	No	Yes	No
12. Wray Park Open Space, Wray Park Road, RH2 0EJ (part site plus St David's)	No	No	No
13. Hope Cottage - land east of Dovers Green and Sidlow	No	No	No
14. Redhill & Reigate Golf Course, RH1 6LB	Yes	No	No
15. Redhill Ambulance Station, Pendleton Road, RH1 6JU	No	No	No
16. Park Hall Road Resource Centre, 1 Park Hall Road, Reigate, RH2 9LH	Yes	No	No
17. Omnibus Building, Lesbourne Road, Reigate, RH2 7JR	No	No	No
18. Watson House & car park, Willis Towers Watson, RH2 9PQ	No	No	No
19. Redhill Reserves Centre, 1 Batts Hill, Redhill, RH1 1DS	No	No	No
20. Industrial Estate at Albert Road North, RH2 9RS	No	No	No
21. Dunottar School, High Trees Road, RH2 7EL	No	No	No
22. Enterprise House, Bancroft Road, RH2 7RP	No	No	No
23. 5-13 West Street Reigate, RH2 9BL	No	No	No
24. Lower Duxhurst Farm, Sidlow, Reigate, RH2 8QH	Yes	No	No
25. Malling Health South Park Surgery, 42b Prices Lane, Land lying to the north of Prices Land, RH2 8AT	No	No	No
26. Reigate Police Station, 79 Reigate Road, RH2 0RY	No	No	No

Table 1: Summary conclusions – Availability, Achievability and Deliverability

- 45 The site assessment document itself sets out in more detail the boundaries of these sites and the issues/limitations arising with each of them. It concludes that only the application site, Woodhatch Place south, is a viable option. The acquisition of the Woodhatch site by Surrey County Council allowed full consideration of the reprovion of the school only 0.7 miles from the current site to take place (subject to planning permission being granted). It provided an opportunity to deliver an outstanding purpose-built building for Reigate's children to the latest Department for Education standards. The new school building would be designed to DfE BB103 standards ensuring that the school has appropriately sized classrooms and other spaces. The new school will be built to the latest environmental standards, be energy efficient and be more cost effective to run. The on-going need for maintenance and condition works would be removed and therefore be less disruptive during school time. The new building would provide better facilities overall and be more cost effective, allowing Reigate Priory School to continue to deliver high quality education provision for future generations in an innovative new building whilst keeping its connection to the outdoors.

Consideration of Comments made by Reigate and Banstead Borough Council on Educational Need

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- 46 In its reply to the consultation on this planning application Reigate and Banstead Borough Council rightly conclude that it is for Surrey County Council as decision maker to weigh up the harms and benefits which comprise the planning balance on this proposal. It raises objection however on several grounds including that there has been a lack of robust justification for the relocation of the school and the loss of Urban Open Space, given alternative options for re-use, adaption and extension of the *existing school* are considered to exist and haven't been fully explored.
- 47 Reigate and Banstead's Heritage Officer has stated that with many former country houses, the use of Reigate Priory as a school is an excellent use, both for education and for the historic building, with the classrooms making best use of the large rooms, rather than the problematic subdivision caused by other uses such as residential. He comments that there are no reasons why the school should not remain in the existing Reigate Priory building with redevelopment of the rear 1950's block to the same scale as the Priory and using extensions on the rear Victorian elements, glazing of the Victorian rear courtyard and using the Victorian wings for classrooms, with the older more ancient parts for ancillary uses and staff. He further suggests a footbridge link at first floor level between the Victorian wing and the 1950's block is possible or even moving the 1950's built form south if a right of way and landscaping of the same width were provided to the north i.e. a direct swap. Both of these solutions he considers would address the safeguarding issue of the right of way. He points out that there are a number of areas where lifts and staircases could easily be placed in the Priory building. The Building Bulletin 103 (BB103) Area Guidelines for Mainstream Schools are for new school developments so should not be applied to existing historic buildings and are in any case supposed to be applied flexibly. There is ample opportunity for new classrooms and the Victorian wing has good room sizes and reasonably wide corridors. The Priory has operated successfully as a school for over 70 years, and is considered to be a unique learning environment in a Grade I historic house and park. Whilst upgrading will be ongoing, the general repairs have already been identified some years ago and despite delays, are already committed to as part of an ongoing program. The kitchen and dining room could be moved and enlarged. He therefore considers that the existing Priory school can be extended and upgraded for continued school use.
- 45 Officers acknowledge that the impact of the development on the Urban Open Space, and the other designations such as locally listed buildings and gardens on the Woodhatch site do need to be fully considered in the assessment of this proposal (and this has been done and is summarised in the following sections of the report).
- 46 Officers are satisfied that the applicant, as Education Authority, has fully demonstrated the limitations of the existing site in being able to deliver a cost effective solution of a school fit for the future and accept the fact that the need to preserve and enhance the existing Grade 1 listed building and Listed Garden on that site would impose severe limitations on what could be achieved. The comments provided by the Reigate and Banstead Heritage Officer serve to demonstrate the bespoke approach which would be needed to be taken on the existing site and that the resulting school would need to preserve the future of the heritage asset. It is clear that in this process the need to preserve and enhance the heritage asset would,

appropriately, be a priority with the needs of the school having to accommodate this. Officers accept that Surrey County Council's priorities, acting as Education Authority, in providing schools for the future will be different to those of the Heritage Officer and Reigate and Banstead Borough Council as the owner of Reigate Priory. Officers accept the applicants case that there is a unique Educational Need arising in respect of the school continuing at its existing site which justifies the Education Authority seeking alternative solutions to address that.

- 47 In respect of alternative sites case law has established that land may developed in any way which is acceptable for planning purposes but it can be relevant and necessary to consider alternative sites in the planning balance *particularly where the site of the proposed development might have significant adverse effects*. (Trusthouse Forte v SSE (1987)). As officers have set out above the existing site has a number of designations which will have a significant impact on its suitability for further development for a school, namely:
- It lies within Metropolitan Green Belt
 - It is within Reigate Town Centre Conservation Area;
 - Reigate Priory is a Grade I Listed Building;
 - Reigate Park is a Grade II Listed Park;
 - The site is a Scheduled Ancient Monument;
 - The site is an area of High Archaeological Potential.
- 48 Officers do accept that consideration of the development of the *existing* site, as an alternative is, in this case, a material consideration. However officers consider that the arguments put forward by the applicants in respect of the suitability of the existing site (and it's restrictive planning designations) provides clear evidence as to why development on that site is not a viable option. Furthermore officers consider that the proposed development itself would not have significant adverse effects (addressed in the sections of the report below) such that the availability of the existing site should be given additional weight in the planning balance in order to reduce harm arising on the proposed site.

Conclusion on Educational Need/Alternative Site Assessment

- 49 Officers accept the applicant's contention that the existing site is not suitable to meet long term needs and requirements as a school and that there are no sites in the near locality which could accommodate a new school other than the application site. Officers consider that this fact is a matter which can be considered in the balance, and indeed given weight in the overall assessment of this planning application in accordance with Development Plan Policy and National Planning advice.

IMPACT ON STATUTORY AND NON-STATUTORY HERITAGE ASSETS

Reigate and Banstead Local Plan Core Strategy 2014

Policy CS4 - Valued townscapes and the historic environment

Policy CS10 – Sustainable Development

Reigate and Banstead Local Plan Development Management Plan 2019

Policy NHE9 – Heritage Assets

Reigate and Banstead Historic Parks and Gardens Supplementary Planning Document

- 50 Paragraph 194 of the NPPF (2021) sets out that in determining applications, Local Planning Authorities (LPAs) 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. Paragraph 195 of the NPPF goes on to set out that LPAs should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 62 Paragraph 197 of the NPPF sets out that in determining applications, LPAs should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities and; the desirability of new development making a positive contribution to local character and distinctiveness. Paragraph 199 of the NPPF explains that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 202 of the NPPF sets out 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 proposals including, where appropriate, securing its optimum viable use.
- 63 Core Strategy Policy CS4 (Valued townscapes and the historic environment) requires that 'development will be designed sensitively to respect, conserve, and enhance the historic environment, including heritage assets and their settings. CS10 requires, inter alia, development to respect the ecological and cultural heritage of the borough including the historic environment. Development Management Plan Policy NHE9 requires, inter alia, that development protects, preserves, and wherever possible enhances, the Borough's designated and non-designated heritage assets and historic environment including special features, area character or settings of statutory and locally listed buildings...when considering proposals that directly or indirectly affect other non-designated heritage assets weight should be given to the conservation of the asset and a balanced judgement taken having regard to the extent of harm or loss and the significance of the asset. Where less than substantial harm to a designated heritage asset would occur as a result of a development proposed, the harm will be weighed against the public benefits of the proposal. All development proposals must be sympathetic to a heritage asset and/or its setting by ensuring the use of appropriate high quality materials, design and detailing (form, scale, layout and massing).

- 64 The Reigate and Banstead *Historic Parks and Gardens Supplementary Planning Document 2020* provides a list of nationally registered “designated” as well as locally listed “non-designated” historic parks and gardens within the Borough. It identifies characteristics for their selection and provides additional guidance for landowners in order to effectively manage historic parks and gardens so that they can be preserved for future generations. Within that document the Woodhatch site (including the application site) is locally listed and described as an *18th century park with good Victorian Shrubbery along Cockshot Hill, now part of the Canon site*. This document is a material consideration in determining this planning application and requires the application to be assessed in terms of the potential impact it would have on the specific historic features of the relevant garden with any landscaping scheme required by a planning permission condition taking into account the historic garden aspects.
- 65 The applicant has submitted an Archaeological Desk Based Assessment including a Heritage Statement in support of this application. This document assesses the impact of the proposal on the setting of the various heritage assets within the vicinity of the application site and is discussed in respects of the various heritage assets below.

Archaeological Implications

- 66 The application site is over the 0.4 hectares which is recommended for archaeological assessment and possibly evaluation under Reigate and Banstead Local Plan Policy. The application is therefore supported by a desk based archaeological assessment that has examined all relevant and currently available sources to determine the archaeological potential of the site.
- 67 The report concludes that the proposals will not impact upon any designated heritage assets but that the site has a moderate potential to contain medieval and post medieval archaeological features but a low potential for earlier periods, although this may be biased by the relative lack of previous investigation in the vicinity. The report also identifies that part of the site, particularly an area along the eastern boundary, has been subject to previous disturbance and so archaeological survival in this area is unlikely.
- 68 In order to identify any archaeological deposits and to enable appropriate mitigation measures to be devised the assessment recommends that a programme of trial trench evaluation would be appropriate within the undisturbed areas of the site. The County Archaeologist agreed with this conclusion which will enable the identification of any buried remains that may be present and allow suitable mitigation measures to be devised if necessary.
- 69 As it is unlikely that archaeological remains of National significance that require preservation in situ will be present the county archaeologist considered that in this case it would be reasonable and proportionate to secure the required programme of archaeological investigation and recording and therefore requested a Written Scheme of Investigation which the applicant has now provided. The County Archaeologist requires a condition to secure the implementation of the measures proposed in that document and officers agree that this is reasonable and necessary.

Listed Buildings

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- 70 **Yew Cottage** Grade II is located approximately 60m south of the Site. Yew Cottage is screened from the site by mature foliage and intervening housing developments. The applicants heritage statement states that the significance of Yew Cottage stems from the asset's historic and architectural interest which is not contributed to by the site nor is the ability to appreciate the asset's significance. The applicants conclude that the Proposed Development will not impact Yew Cottage. The Historic Environment Officer agrees with this and comments that the significance of the building is in its survival as an early 19th century dwelling. The setting of this building (as with the Angel Inn below) has been largely urbanised owing to the surrounding development and the modern road network and as a result makes little contribution to their significance.
- 71 **The Angel Inn** Grade II is again located approximately 60m south of the site. The asset is screened from the site by development on Angel Place. The applicants states that the significance of the Angel Inn is derived from its architectural, historic and potential evidential interest. The Angel Inn is considered a local landmark, located on the junction between Cockshot Hill and Woodhatch Road defining the character of the area. This setting does not include the application site. The applicants conclude that the Proposed Development is unlikely to impact The Angel Inn as the Site does not fall within the asset's setting nor contribute to the ability to appreciate the assets significance. The Historic Environment Officer agrees with this and comments that the setting of this building has been largely urbanised owing to the surrounding development and the modern road network and as a result makes little contribution to its significance.
- 72 **Impact on Reigate's Conservation Area** – Officers note that Reigate and Banstead Borough Council comment that the proposal will have an impact on the approach to Reigate Conservation Area. Surrey County Council's Historic Buildings Officer has advised that he is not of the opinion that there is harm to the setting of Reigate Conservation Area. The school building is a significant distance away from the Conservation Area. There are no views from or to the Conservation Area from the school site nor any views of the site which includes the Conservation Area. The site is also not mentioned as being important within the draft Conservation Area appraisal produced by Reigate and Banstead. Officers agree with the opinion that there is no impact on its character and appearance of Reigate Conservation Area.
- 73 Having regard to the above officers consider that the proposal will not have any adverse impact on these designated heritage assets.

Non-designated buildings (locally listed)

- 74 **Woodhatch Lodge** is located approximately 70 east of the proposed access road into the application site and approximately 120m north of the proposed school building. The special interest of Woodhatch Lodge is derived from its historic and architectural interest as well as its relationship with its setting of the Woodhatch site. The site is part of Woodhatch therefore is considered to fall within the immediate setting of the asset. Woodhatch Lodge has already undergone significant alteration

and change in use. The Proposed Development will not physically impact the asset but will result in changes to the assets setting. Woodhatch Lodge has been designed to maximise views of the parkland, evident in the number of south-facing windows and the terrace. The relationship between Woodhatch Lodge and the created landscape of the historic park contributes to the historic, architectural and aesthetic interest of the asset. The applicants state that the development of the site will visually alter the setting of Woodhatch Lodge and impact the ability to interpret the historic relationship between Woodhatch Lodge and Woodhatch Park. The applicants conclude that while the ability to appreciate the assets' significance will be impeded by these changes to setting, the special interest of the asset is also derived from the historic and architectural interest of the house which will not be affected by the development. Therefore, the applicants consider that the proposed development will result in a slight level of harm to Woodhatch Lodge.

- 75 The Historic Environment Officer has assessed Woodhatch Lodge together with Woodhatch Park (considered in more detail below) and concludes that the proposal will cause harm to these two heritage assets as part of the former parkland will be lost for the school. This will harm views from Woodhatch Lodge and affect the ability to appreciate its landscaped setting. He considers the school building will be particularly prominent in views from this heritage. While he states that there is little which can be done to mitigate this harm, he expressed disappointment at the 2.4m high weld mesh fencing proposed in the application which will separate the school site from the remaining area of the locally listed park. He considered that this fence would be highly visible around the Woodhatch site and would be unsightly, particularly to the east of the site. Officers have discussed these comments with the applicants. Officers accept that the proposed fence will divide the site, but it is an essential requirement for safeguarding. The use of green weldmesh is appropriate in a landscape setting and the applicant indicative landscaping plan does show trees and planting to the south of the fence within the application site red line. As the fence follows the boundaries of the existing ponds on the site there is little opportunity to provide additional landscaping directly adjacent to it to the north but the applicant has agreed to provide additional landscaping including trees outside of the application site on land within the applicants ownership to the north and east (to the north and east of the existing ponds). This planting will be designed to soften the appearance of the boundary fence from the north and east and to provide a degree of landscaped enclosure of what would remain of the Woodhatch site in this location in a way which reflects its current parkland appearance and nature - this will be secured by appropriate planning conditions.
- 76 **Hill House** is located approximately 60m north of the access into the site and some 180m from the proposed school building. The functional relationship between Hill House as the former lodge of Woodhatch Lodge and Woodhatch Park, where the application site is located, has already been and the visual relationship has been lost through development of 19th century and modern office blocks. The special interest of Hill House is derived from its historic and architectural interest which is not contributed to by the site. Therefore, the applicants conclude that the proposed development is not considered likely to impact Hill House. The Historic Environment Officer advised that he disagreed with the assessment provided by the applicant of this building. He states that it dates to c1855 and appears to have been constructed as a totally separate dwelling to Woodhatch Lodge. He is not aware it has any

association with Woodhatch and he does not consider Woodhatch Lodge or Woodhatch make any meaningful contribution to its setting.

Non designated heritage asset (locally listed garden)

- 77 The Proposed Development will result in the partial loss of Woodhatch a non-designated locally listed park and garden. The heritage value of the park stems from the survival of Victorian shrubbery and specimen trees along the western boundary and as the setting of Woodhatch Lodge, discussed in the previous section. When the Canon office buildings (now Woodhatch Place) were built on the site during the late 1990s spoil from the development was deposited in mounds within the current application site for the school and subsequently planted with a mix of coniferous and deciduous trees. These have now become small blocks of semi-mature woodland, though it appears that little to no proactive management of this woodland has occurred. The remaining land within the application site is covered with mown amenity grass. A pond, also dating from the Canon development, separates the application site from the remaining parkland, Woodhatch Lodge and the office complex to the immediate north.
- 78 The site is not within a defined landscape character area within the Surrey Landscape Character Assessment 2015, as it is within the built-up area of Reigate; nor is it within close proximity to any local or national landscape designations (AONB/AGLV). A public footpath (FP 47) runs along the eastern site boundary, linking Smoke Lane to the north with Hornbeam Road to the south. Views into the site from here are very limited due to an existing fence and established vegetation. Views into the site from Cockshot Hill are similarly also very limited.
- 79 The applicant concludes that the proposed development will slightly impede the ability to interpret the architectural and historic value of the locally listed garden equating to a *moderate* level of harm. Replies to consultations on this aspect of the proposal are summarised below.
- 80 The Council's Landscape Officer has assessed the proposal and agrees that the proposed development would result in the partial loss of the historic parkland at Woodhatch. He considers that the consequences of this would be a degree of harm in landscape terms, arising from the loss of existing landscape fabric which contributes to the parkland character (open grassland and some specimen trees) and also the change in character due to the introduction of a large, prominent modern building into part of the site which is currently undeveloped; together with school infrastructure including sports pitches, car parking and fencing. In his opinion the existing partial separation of the northern and southern sections of parkland by the modern pond and vegetation, and the lack of notable specimen trees and historic parkland layout / features (e.g. paths) within the *southern* section of parkland (the application site) combine to limit the harm arising to the character of the historic parkland and its relationship with the locally listed Woodhatch Lodge.
- 81 The Council's Historic Environment Officer notes that Woodhatch Park is locally listed and as such is considered a non-designated heritage assets. Under paragraph 203 of the National Planning Policy Framework (NPPF) 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. The layout of the parkland is indicated on the 1869 OS map which shows a mix of a traditional 18th century English landscape garden layout with some of the formalities, such as a terrace, used by designers including Humphrey Repton.

Some of this landscape setting is still evident including the terrace, paths and pond to the south. The area beyond the line of trees (the current application site) does not contain any specific features of interest but would have formed part of the wider open parkland for the site. It has been greatly altered over time and its only contribution is in revealing the historic wider parkland of the site. The significance of the Woodhatch Park consists of its status as an English landscaped garden set out in the late 18th or early 19th century.

- 82 The Council's Historic Environment Officer considers that the proposal will cause harm to the locally listed garden (and Woodhatch Lodge) as the former parkland will be lost for the school. In his opinion this will harm views from Woodhatch Lodge and affect the ability to appreciate its landscaped setting. He considers the school building will be particularly prominent in views from the heritage assets and whilst he is of the opinion that there is little which can be done to mitigate this harm, he is of the opinion that the boundary that will separate the locally listed park from the school site could be designed more sympathetically with planting than currently indicated on the applicants plans (as discussed in the previous section this has been agreed with the applicant and will be secured by planning conditions).
- 83 The Council's Historic Environment Officer concludes that overall, the scheme will lead to the loss of extensive parkland which once formed part of the grounds of the locally listed building. It will also harm views in and around the site. If the buildings were listed, he would consider this to be a *moderate* degree of *less than substantial* harm as the parkland makes a positive contribution to both heritage assets, however they are not listed. He comments that owing to the significant benefits of the scheme the harm that is caused is significantly outweighed.
- 84 Reigate and Banstead Borough Council's Conservation Officer has raised objections to the proposal on grounds of adverse impact on the locally listed garden. He comments that the Historic Parks & Gardens SPD April 2020 (a revision of the old SPG) lists the site as "An 18th century park with good Victorian Shrubbery along Cockshot Hill". Policy NHE9 notes, inter alia, aside from the general historic asset requirements, that additionally for a historic park and garden, development will be required to avoid subdivision and features such as trees and distinctive planting (in this case the evergreen shrubbery along Cockshot Hill) should be retained or restored. The proposal in this case subdivides the site, and resulting in the loss of mature trees, as well as trees planted in the 1990's to maintain the historic garden tree species and parkland character, and causes damage to the historic shrubbery and hedge line to Cockshot Hill. An Historic Garden Management Plan should have been produced as a starting point in terms of understanding the park and garden but this has not been provided.
- 85 Reigate and Banstead' Conservation Officer also states that the historic garden is a simple structure of open grass parkland interspersed with trees, an evergreen shrubbery of Holly, Yew and parkland trees to the western boundary and the backdrop of the greensand ridge. He considers that as well as the damage to the western shrubbery, the school site and its hardstanding and buildings cover a substantial part of the historic garden designation and have a negative impact on the setting of the rest of the site. The school building is out of scale with the rest of the site and surrounding buildings and is on a new raised bund (which he also considers may impact on the future health of trees along the western boundary).

- 86 A number of the representations received makes similar comments to those of the consultees above. Woodhatch Green Spaces Preservation Group (not a statutory consultee but a local amenity group) have provided detailed comments on this matter which in summary make the following observations:
- The application appears to lack appreciation that the site is part of a former larger estate in the area Woodhatch Lodge and the locally listed garden are the only remaining elements and as such should be afforded high protection
 - Surrey County Council's occupation of Woodhatch Place allows the opportunity to enhance the historic garden and open it up to the public
 - The proposal does not accord with Policy NHE9 as it fails to protect a heritage asset
 - The National Planning Policy Framework similarly in paragraph 197 promotes the sustaining and enhancing of the significance of heritage assets
- 87 Officers consider that in accordance with the guidance in the National Planning Framework and Development Plan Policy NHE9 in assessing this proposal consideration should be given to the conservation of the heritage asset comprising the historic park and garden. However as the asset is non designated it is not required to give *great weight* to its conservation and a balanced judgement must be taken having regard to the extent of harm or loss and the significance of the asset weighed against the public benefits of the proposal.
- 88 Officers consider that the application site, comprising only a part of the locally listed garden, has already seen a significant degree of change, most notably when the site was developed in the 1990s. This land profile of this part of the site was significantly raised and altered and a number of groups of trees were planted. Whilst this change has created the distinct parkland environment which exists today this does not represent the original park and garden. As such officers consider that a further change to this part of the site, as a result of the proposed development, would cause *less than moderate harm* to the undesignated heritage asset. Furthermore officers consider that the proposed siting of the building on this part of the Woodhatch site retains the more historic parts of the original garden to the north which provides the immediate setting to Woodhatch Lodge. Officers agree with the comments of the consultees on the point that the northern boundary of the school site introduces a stark division across the garden as shown on the submitted plans. This impact will be most visible to the visitors and users of Woodhatch Place and the occupiers of The Belvederes rather than the wider community. Officers consider that this impact can be mitigated in respect of Woodhatch Place with the provision of appropriate planting and screening outside of the northern boundary which has been agreed by the applicant and can be secured by condition.
- 89 Officers conclude that the proposal will give rise to harm to the locally listed garden however that harm is *less than moderate* but it is outweighed by the educational need for the development. Furthermore officers are mindful that this proposal will enable a more suitable use to be made of Reigate Priory (the building that the school is vacating), which is a designated asset of significant importance, the original part of which has a long history dating back to Tudor times. This building is both Grade I

listed and a Scheduled Ancient Monument, as well as being located in the historic Reigate Priory Park, which is listed separately.

Conclusions on impact on heritage assets

- 90 The impact on heritage assets has been proportionally assessed by the applicant. The proposed development would result in harm to the non-designated heritage assets only as follows:
- Limited (minor adverse) harm to the character and setting of the non-designated heritage asset (Woodhatch Lodge)
 - Less than significant (less than moderate) harm to the existing landscape fabric of the locally listed garden including loss of existing trees, tree blocks and undeveloped open grassland albeit not all of these features contribute to the historical layout or features of the garden.
- 91 Officers consider that the above harm can be partially mitigated in the long term by replacement planting and landscaping including additional landscaping across the centre of the site to soften the impact of the proposed fencing however officers acknowledge there will still be a degree of harm arising to undesignated heritage assets but this is considered to be *less than significant*.
- 92 Officers consider that the requirements of the development plan policy and Supplementary Planning Guidance have been met in that the application has been assessed in terms of the potential impact it would have on the relevant heritage assets. The proposal will not give rise to any harm to designated heritage assets but will cause a degree of harm to the non-designated locally listed Woodhatch Lodge and garden. Planning conditions will be attached to secure details of the landscaping and replacement trees to be provided with the scheme consider the historic garden aspects of the site as well as impact on the aspect of the garden and setting of Woodhatch Lodge, as well as details of how existing trees will be protected during development to minimise adverse impact. As the proposal give rises to less than significant harm to a non-designated heritage asset, this the harm must be weighed against the benefits of the proposal.

TREES, ECOLOGY AND BIODIVERSITY

Reigate and Banstead Local Plan Core Strategy 2014

Policy CS2 – Valued Landscapes and the Natural Environment

Policy CS10 – Sustainable Development

Reigate and Banstead Local Plan Development Management Plan 2019

Policy NHE2 - Protecting and enhancing biodiversity and areas of geological importance

Policy NHE3 – Protecting Trees, Woodland Area and Natural Habitats

Policy NHE4 – Green and Blue infrastructure

Policy DES1 - Design of New Development

- 93 Paragraph 174 of the National Planning Policy Framework 2021 states that planning policies and decisions should contribute to and enhance the natural and local environment by part (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; and part (e) 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. Paragraph 179 further goes on to state that when determining planning applications, local planning authorities should conserve or enhance biodiversity especially where this can secure measurable net gains for biodiversity.

- 94 Paragraph 180 states that when determining planning applications, local planning authorities should, *inter alia*, 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) Development whose primary objective is to conserve or enhance biodiversity should be supported; while 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 or enhance public access to nature where this is appropriate.
- 95 Reigate and Banstead Core Strategy Policy CS2 outlines that urban green spaces and green corridors should be retained and enhanced. Policy CS10 (9) seeks to ensure that development will be designed reflecting the need to adapt to the impacts of climate change (for example, higher temperatures, increased flooding, increased pressure on water resources, impacts on ecology and built heritage and impacts on ground conditions).
- 96 Development Management Plan Policy NHE 2 mainly relates to Biodiversity designations, however for generally development part 5 of the policy requires that development proposals;
- a) retain and enhance other valued priority habitats and features of biodiversity importance; and
 - b) be designed, wherever possible, to achieve a net gain in biodiversity. Where a development will impact on a priority habitat or species, or protected species, and mitigation cannot be provided on site in an effective manner, developers may be required to offset the loss by contributing to appropriate biodiversity projects elsewhere, in a location agreed with the Council.
- 97 Development Management Plan Policy NHE3 2019 states, *inter alia*, that
- (1) new development proposals, where relevant should include an assessment of existing trees and landscape features on site, including their suitability for retention. The assessment should include consideration of the impact on habitats beyond the site boundary....
 - (3) Unprotected but important trees, woodland or hedgerows with ecological value should be retained as an integral part of the design of development except where their long-term survival would be compromised by their age or physical condition....
 - (5) where replacement tree and hedge planting is required, appropriate species of trees should be used and sufficient space must be provided at the

design stage for tree provision, including space to allow trees to reach their optimum size.

- 98 Policy NHE4 of the Development Management Plan states that development proposals must avoid any adverse impacts on existing habitats and take the opportunity to enhance and incorporate biodiversity as an integral part of design, including watercourses and riverside habitats.
- 99 Part 8 of Development Management Plan Policy DES1 requires appropriate landscaping to mitigate the impact, and complement the design of a new development, protecting and enhancing natural features, providing details regarding future maintenance and replacement planting.

Trees

- 100 The applicant has submitted an Arboricultural Impact Assessment with this application which notes the following:

- The trees on the application site vary in age from young to mature and are predominantly in fair to good condition. The majority of the trees on the site are formed of three large semi mature tree groups G14, G21 and G39 that are a result of previous planting programmes. The site also includes a long avenue of early mature to mature trees along the western boundary bordering Cockshot Hill.
- There is a wide range of species present including ash (*Fraxinus excelsior*), English oak (*Quercus robur*), red oak (*Quercus rubra*), cherry laurel (*Prunus laurocerasus*), goat willow (*Salix caprea*), yew (*Taxus baccata*), common lime (*Tilia x europaea*), sycamore (*Acer pseudoplatanus*), Norway maple (*Acer platanoides*), elder (*Sambucus nigra*), Scots pine (*Pinus sylvestris*), western red cedar (*Thuja plicata*), holly (*Ilex aquifolium*), blue atlas cedar (*Cedrus atlantica* 'Glauca') and Raywood ash (*Fraxinus angustifolia* 'Raywood'). This level of species diversity ensures a good level of resilience to changes in climate and the risk of pests and disease.
- The most significant trees included within the survey are trees T2, T27 and T44, one mature lime and two mature oak trees that are considered to provide significant landscape and amenity value. These trees are positioned along the western boundary bordering Cockshot Hill among various other early mature to mature trees which as a whole are considered to provide significant landscape and amenity value to the wider area.
- There is a group Tree Preservation Order (TPO Ref: 717 A1) on trees along the western side of the Site bordering Cockshot Hill.
- A small number of trees require remedial works to address defects and some trees are considered inappropriate for retention due to significant defects or decline. More generally the site contains a number of ash trees, especially adjacent to the boundaries. Ash dieback (*Hymenoscyphus fraxineus*) is a significant disease which can lead to death and instability. There is no control currently available to address this issue and where trees become infected they are likely to decline and die with wood strength typically impacted from an early stage. However, there is some potential for a small number of trees to demonstrate some resistance to the disease. Ongoing management of ash in areas of regular access or where the site borders roads, private properties or

publicly accessible areas is therefore likely to be required as part of the future management of the Site, to meet legal duty of care responsibilities as a tree owner, and this should be factored into any consideration of the future management of the site

- Eight individual trees, four tree groups and part of four tree groups are to be removed to facilitate the proposed development; this includes four individual trees, one tree group and part of three tree groups classed as moderate quality (Category B), three individual trees, three tree groups and part of one tree group classified as low quality (Category C) and the remaining individual tree classified at very low quality (Category U).
- All of the trees to be removed to facilitate the Proposed Development are within the red line application boundary. Trees T12, T19, T37, G54 and parts of G6 and G22 are all considered to be subject to TPO (Ref: 717 A1). The loss of these trees is necessary to achieve the construction and landscaping proposals for the site.
- In addition, three trees (T29, T38 and T66) of very low quality (Category U) are also recommended for removal. These trees are arguably not suitable for long term retention and their removal is justified regardless of the proposed development. Two of these trees (T29 and T38) are positioned outside of the redline boundary therefore prior to any works the ownership of these trees must be established and the consent of the tree owner obtained in writing (Officer note: these trees are within the wider Woodhatch Place site owned by Surrey County Council).
- Tree removals and tree pruning works to facilitate the proposed development are detailed in a Tree Survey Schedule. Trees T8, T9, G16, T27, and T48 are likely to require localised crown lifting works to a height of 5m to facilitate the construction of new car parking spaces, footways and embankments. This level of pruning will not have a negative impact on the health or amenity of these trees.
- Trees T8, T9, T27 and T48 are all considered to be subject to TPO (Ref: 717 A1). No additional works to retained trees are likely to be required.

- 101 The County Council's Landscape Officer comments, inter alia, that the removal of a Category B common oak to facilitate the new site access (egress) onto Cockshot Hill is unfortunate and would break up the existing attractive unbroken screening provided by the TPO group of trees (and shrubs). The County Arboriculturalist agrees with this and both comment that the overall tree removal on this scheme has a significant/high impact due to the maturity of some specimens proposed for removal and the significant numbers of semi mature densely planted trees within groups G6, G14, G21, G22, G39, G54 of which actual proposed removal numbers have not been quantified and for which this habitat cannot be re-provided for onsite, therefore requiring mitigation offsite in terms of biodiversity net gain (see Ecology and Biodiversity section of the report below for further detail on this issue).
- 102 Both the County Arboriculturalist and County Landscape Officer have raised a number of detailed concerns around the protection of existing trees and the development of parking and roadways impacting on their roots and requests that a detailed Arboricultural Method Statement be provided prior to commencement. Whilst outline tree protection measures are provided in Appendix D of the submitted Arboricultural Impact Assessment, in accordance with the recommendations in that document an Arboricultural Method Statement is required to set out the phasing of site operations,

the finalised tree protection measures for the site and to provide more detail on how sensitive elements of work are to be achieved in proximity to retained trees. Officers consider that a condition should be attached in this regard.

Tree Planting/landscaping

- 103 The County Landscape Officer advises that in the case of the existing site landscape fabric/features, the harm would be significant (major adverse) immediately post-construction; however, this is partly due to the loss of the extensive woodland blocks of relatively low arboricultural and ecological value, dating from circa 2000. The proposed development would also result in harm to views and visual amenity including local residents, persons using the local road and footway network and workers/visitors to the SCC offices and grounds at Woodhatch Place. In the case of residents of some apartments within The Belvederes development this harm is likely to be significant (major adverse) immediately post-construction due to the close proximity and limited screening. The currently proposed landscaping scheme offers limited opportunities to materially increase visual screening to The Belvederes development, meaning the longer-term residual adverse visual effects may not substantially reduce. He comments that the implementation of a high-quality landscaping scheme could mitigate these impacts to an extent. Replacement tree planting will need to be provided to enhance the proposed development, secure biodiversity benefits and mitigate the key impacts. Officers accept that the proposal will give rise to a visual impact on the visitors to the site and in particular to residential occupiers of The Belvederes to the south. The right to maintain a view is not a valid planning consideration. Officers have considered in detail the matter of *residential amenity* in another section of the report below. Officers do not consider that the visual impact on residential dwellings is significant and would not constitute a reason to withhold planning consent on this basis. However officers agree with the conclusions of the Landscape Officer that the visual impact arising can and should be mitigated with more appropriate planting than currently indicated and officers recommend that planning conditions are attached requesting those details of landscaping in this regard.
- 104 An indicative drawing of proposed landscaping and tree planting was provided with this application, but during negotiations with the applicant agreement to include additional landscaping outside of the site boundary (on land in the applicants ownership) has been secured. Full details of proposed landscaping will be required to be submitted and approved (controlled by condition) to include the following:
- Where new trees are to be planted into a hard-surfaced environment (i.e. within or in close proximity to roads, footways, other hard surfacing and underground utilities), best practice recommends the use of proprietary underground cellular systems/structural soils/root barriers etc. in order to prevent compaction, restriction of the rooting environment and conflict with utilities and to maximise the tree life expectancy and establishment needs. This needs to be considered as part of the detailed design for landscaping
 - Further investigation of the use of above soil surfacing 'tree friendly' or cellular confinement proprietary systems

- Details of location of proposed tree planting to include within the 'soft play space' proposed off Hornbeam Road, within the space between the proposed fencing and 'The Belvederes' to screen/buffer and augment the thicket planting here, within the space off the NE corner of the all-weather pitch, between the proposed MUGA, outside the northern and eastern site boundary (north of the ponds) on land within the Woodhatch site, and within the woodland outdoor learning area
- Detailed tree planting specification should be provided, which should detail, species, sizes (recommend 14-16cm extra heavy standard in size or less to ensure proper establishment), planting arrangement, planting pit details, watering/staking arrangement
- Detailed tree watering/aftercare maintenance plan for a minimum of 5yrs post planting and which should be in a matrix form showing amounts/number of watering visits throughout the March-September growing season and any other associated maintenance requirements.
- A detailed existing/proposed services plan needs to be provided and relevant sections of the arboricultural report (Section 5.9) need to be strictly adhered to and where required a method statement worked up for approval- which should identify the requirement for air lance excavation or trenchless 'impact moling' if unable to be outside of RPA's.
- Appropriate planting to secure the maximum biodiversity gain from the site in accordance with the Biodiversity Net Gain Assessment.

105 Given the loss of existing trees on the site including some which fall into the category of valued protected habitats the proposal does not fully accord with development plan policies in this regard. The impact arising has been minimised with the most notable and visible trees along the boundaries of the site being retained, with proposed measures to protect these retained trees during construction and will to some degree be mitigated by replacement planting and landscaping, which can be secured by planning conditions. Officers consider that the impact on existing trees has to be considered in the overall planning balance and weighed against the need for the school.

Ecology and Biodiversity

- 106 The applicants have submitted an Ecological Impacts Assessment and Biodiversity Net Gain Assessment (amended during the course of the application) with this application, as well as a Construction Environmental Method Statement.
- 107 The Ecological Impacts Assessment summarises the results of an extended Phase 1 Habitat survey and preliminary roost assessment for bats carried out in 2021 within the site and the protected species surveys carried out in 2020 for a wider site. This broadly identified the following baseline conditions:
- There are no habitats listed as a priority habitat on Section 41 of the Natural Environment and Rural Communities Act 2006 within or adjacent to the Site. The closest priority habitat shown in Multi-Agency Geographic Information for the

Countryside (MAGIC) website is located 100 m to the north-east of the Site (broadleaved woodland).

- The site comprises the following habitats:

Habitat	Site Description	Area (ha)
Amenity Grassland	A large block of amenity grassland was present within the middle of the Site	1.24
Mixed Woodland	Two blocks of mixed woodland, one in the eastern section of Site, one in the southern section of Site were present.	0.77
Semi-Natural Broadleaved Woodland	A block of semi-natural broadleaved woodland was present running along the western edge of the Site.	0.19
Tall Ruderal	Two blocks of tall ruderal vegetation, one in the south of the Site, and one island within the amenity grassland habitat were present.	0.09
Plantation	A plantation of black pine (<i>Pinus nigra</i>) was present within the western edge of the amenity grassland.	0.06
Building and hard standing	Shed to the south-west of the Site and access to the Site	0.05
Poor Semi-Improved Grassland	Two blocks of poor semi-improved grassland, one on the western edge of the eastern block of mixed woodland, and one on the eastern edge of the plantation woodland.	0.04
Scrub	A small block of bramble (<i>Rubus fruticosus</i> aggregate) scrub was present on the southern tip of the southern block of mixed woodland.	0.03
Introduced shrub	Small area to the south-east dominated by buddleia (<i>Buddleja davidii</i>)	0.01
Scattered trees	Scattered trees	N/A

- The site was found to be suitable for reptiles and amphibians
- No evidence was found indicating presence of Great Crested Newt
- The site was found to be suitable for foraging, roosting and providing routing for bats and a separate survey was undertaken in this regard (summarised below under **Protected Species**)
- The site was found to be suitable for breeding birds
- Both common toads and frogs were recorded in the water bodies to the north of the Site, and during the reptile surveys carried out on Site in 2020. The woodland and poor semi-improved grassland habitat on the site are suitable terrestrial habitat for these species
- A two-entrance badger sett was discovered within the woodland on the western edge of the site during the survey carried out in May 2020 but was found to be abandoned. Next to these two entrances, a third abandoned entrance was found during the site survey. An abandoned one-entrance outlier sett was also discovered during the site visit to the south of the previously discovered sett. Mammal paths, possibly badger, were located in the mixed woodland on the southern edge of the site and in the western woodland, and a badger snuffle hole was located within the western edge of the plantation woodland.

- While two blocks of the woodland on the site, the plantation island and within the woodland, contained hazel (*Corylus avellana*), the prevalence of pine trees in the former habitat and the relative isolation of both blocks of habitat from other suitable habitat made them largely unsuitable for dormice. The hazel within both blocks of this habitat is quite scarce and other species that could provide foraging resources such as honeysuckle, beech nuts and yew arils are either scarce or non-existent within the two blocks of habitat.
- The woodland on the southern and western edge of the site is suitable foraging habitat for hedgehogs and contains potential resources for hibernating animals. Red fox is a generalist and are known to be present on the site through latrines, sightings and soundings present in previous surveys. Red fox is also known to use old badger setts that have been abandoned and may be present within the woodland in the south of the site.
- There were no species listed on Schedule 9 of the Wildlife and Countryside Act (1981) as amended, or on the Alien Invasive Species (Enforcement and Permitting) Act (2019) found within the site. Three non-native species with the potential to become invasive; buddleia, cherry laurel and holm oak were recorded within the woodland on the site. No signs of variegated yellow archangel or rhododendron were recorded on the site in this occasion, the first one likely due to the season of carrying out the survey

108 The Proposed Mitigation Measures within the Ecological Impact Assessment concludes that the design of the proposed development includes the retention of the northern part of the eastern mixed woodland habitat, most of the broadleaved woodland along the western site boundary and some amenity grassland. However more than half of the mixed woodland (i.e. the two blocks to the west of the site and southern half of the eastern woodland block) and the plantation woodland and other habitat present will be lost due to the proposed development. The impact of the proposed development on habitats is considered to be adverse moderate and significant for the loss of woodland habitat but the measures proposed in the Biodiversity Net Gain Assessment would mitigate the loss of current habitat and concludes that if they are implemented, the impact of the proposed development would be not significant. If retention or creation of woodland habitat on site is not possible, the report states that the applicant should mitigate the loss of habitat off site. The enhancement of habitats on-site to mitigate the loss of current habitat would improve habitat suitability for protected species such as reptiles, ground nesting birds and invertebrates (and indirectly foraging bats and birds) and connectivity with other nearby habitats.

109 Surrey Wildlife Trust acting as SCCs Ecological Consultants assessed this document and in respect of the baseline survey summarised above commented that although it states that no habitats are listed as a *priority habitat*, the Biodiversity Net Gain Assessment (also submitted with the application) concludes that some of the woodland on the site falls within the Woodland Priority Habitat Network. This comprises the existing strip of semi-natural broadleaved woodland, approximately 10m wide at the widest point, running along the western edge of the site (Cockshot Hill boundary) which contains abundant instances of English oak with frequent cherry laurel, sycamore (*Acer pseudoplatanus*) and yew (*Taxus baccata*) with occasional field elm (*Ulmus minor*), and ground cover dominated by English ivy (*Hedera helix*) with occasional bramble and white dead nettle (*Lamium album*). This habitat has been categorised in UK Habitats as 'Woodland and forest – Lowland mixed deciduous woodland'. The habitat has been assigned a condition of good and has

been assessed as having high strategic significance due to its importance in local policy. Some of the habitat also falls within the Woodland Priority Habitat Network.

- 110 Surrey Wildlife Trust advised that more than half of the mixed woodland (including part of the Priority Habitat Woodland) and the plantation woodland would be lost to facilitate the development. Based on the current landscape proposals, due to this and other habitat loss, the development would result in a net loss of 34% for area-based habitats. Surrey Wildlife Trust therefore requested a full biodiversity metric calculation from the applicant to *quantify* the loss and then measures to demonstrate that the proposal will provide the biodiversity net gain required to meet national and development plan guidance.
- 111 Surrey Wildlife Trust did advise that it would be feasible within the mechanism of biodiversity net gain to use off-site habitat but that this should include an area of lowland mixed deciduous woodland. They confirmed that once the habitat was identified, a baseline habitat survey would be required of the woodland to confirm that it is in a moderate condition, and that measures could be carried out to enhance it to a good condition. Officers agree with the conclusion of Surrey Wildlife Trust and had several meetings with them and the applicant to address this issue, the results of which are examined in more detail below under **Biodiversity Net Gain**.

Impact on existing species including Protected Species and proposed mitigation

- 112 The impact on species having regard to the information in the Ecological Impact Assessment, the comments of Surrey Wildlife Trust together with the applicants submitted Construction Environmental Method Statement are set out with officers conclusions below:

Bats

- 113 Based on the information provided within the Ecological Impact Assessment in respect of Bats, Surrey Wildlife Trust requested submission of the full bat survey and this has now been provided. This clarified that four trees and a building (shed) with bat roost suitability will be affected by the proposed development. The other trees identified with bat roost suitability are to be retained on site. The four trees with bat roost suitability (T4, T12, G6b and G18) are scheduled to be removed during construction works to facilitate the proposed development. The four trees were recorded as having low suitability for roosting bats. The bat survey report also confirmed that a bat emergence survey had been carried out on the building to be demolished in the southwest corner of the site and no bats were found emerging from the building.
- 114 The bat survey makes several recommendations to ensure that no bats are harmed or disturbed by demolition or tree felling works and that works should follow a Precautionary Method of Working. Officers consider it appropriate to attach conditions requiring development to commence in accordance with this survey and to require the Construction Environmental Method Statement be updated to include these detailed measures within it for completeness.
- 115 Surrey Wildlife Trust also comments that bats use the woodlands within the site as commuting corridors and foraging habitats. Low bat activity was recorded on the woodlands in 2020. During the construction works, there could be a temporary displacement of bats due to disturbance and habitat loss. However, the retention of

woodland parcels and adjacent waterbodies will reduce the negative effects on commuting and foraging bats.

- 116 Surrey Wildlife Trust comments that whilst the Ecological Impact Assessment provides recommendations for lighting design for the project, it does not provide a specific lighting impact assessment based on the actual lighting design for the project. The external lighting plan 1138822-ACM-XX-00-DR-E-0404 Rev 03 shows that the edge of the pond will receive up to 5.0 lux, which could adversely impact bat species which are not light tolerant, such as Daubenton's, which the Ecological Impact Assessment states could be present on the site due to the presence of water. It is unknown what the baseline light levels are across the proposed development site to be able to assess whether plans will increase lighting across likely active bat habitat (i.e. pond, retained woodland) to an extent which could influence their behaviour. The advice of the Surrey Wildlife Trust is that the applicants provide an impact assessment for bats and lighting, based on the 2020 bat activity data, lighting design proposed and the proposals for post-development habitats set out in the Biodiversity Net Gain Assessment. Officers note that the lighting assessment submitted by the applicant does indicate that illumination to bat roosting areas listed in the ecology report has been avoided but concur with the view of Surrey Wildlife Trust and recommend that a suitable condition requiring further details of lighting is applied which should demonstrate measures to reduce lighting spills on woodland and waterbodies habitat having regard to Bat Conservation Trust lighting guidance.
- 117 Officers agree that the Construction Environmental Method Statement submitted currently does not contain sufficient detail on this matter and it should incorporate measures to reduce lighting spills on suitable trees for bats identified on the Preliminary Bat Roost Assessment report prepared for the site and officers consider this should be addressed within an amended document.
- 118 The applicants' ecological advisors state that the enhancement of the retained woodland, the creation of new and diverse habitats on site, including green roofs, hedges and new tree planting along accesses will increase the invertebrate population on site, i.e. the principal source of food for bats. The use of certain species of plants that are beneficial to nocturnal insects (e.g., moths) would additionally benefit bats through increased prey availability. Officers consider that as a detailed landscaping scheme will be required to be submitted subject to condition these aspects can be considered and secured. The creation of the new habitat or enhancement of existing woodland off-site and the enhancement of the retained on-site woodland to compensate the loss of woodland will mitigate the loss of foraging habitat for bats (again these will be required by conditions). The Ecological Impact Assessment concludes that with embedded mitigation (enhancement of retained woodland in and off site, creation of habitats and reduction of lighting spill or use of directional lighting to avoid spill on woodland and waterbodies), the effect on commuting and foraging bats once the development is operational will be minor and not significant. Officers agree with this conclusion.

Hazel Dormouse

- 119 The Ecological Impact Assessment notes that Hazel dormouse is a European Protected Species protected under Regulation 43 of the 2017 Regulations as amended by the 2019 Regulations and protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). While the habitats on the site are not good quality for dormice, it is recommended that any clearance of scrub and woodland is

complete under ecological supervision. Ecological supervision is included within the submitted Construction Environmental Method Statement. Should dormice, or signs of dormice be found then works should cease, and a series of surveys and a European Protected Species Licence may be required to complete the works (this could be specifically stated within the amended Construction Environmental Method Statement).

Badgers

- 120 Badgers and their setts are protected from disturbance and destruction by the Protection of Badgers Act (1992). Additionally, the Wild Mammals Protection Act 1996 lists a number of actions against wild mammals that also apply to badgers. No active badger setts were found on site, though the Ecological Impact Assessment recommends that walkover surveys closer to the start date of construction on the site are undertaken which is included within the Construction Environmental Method Statement.

Other mammals

- 121 Hedgehogs are a notable species through inclusion within Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Additionally, the Wild Mammals Protection Act 1996 lists a number of actions against wild mammals that also apply to both hedgehogs and red foxes. The potential impacts on hedgehogs will be mainly due to the loss of habitat and degradation as well as increased traffic within the site during construction works. Habitat loss is assessed as a minor effect due to the retention of woodland habitat to the west and north-east and the predominant loss of amenity grassland and some introduced shrub planting. Red foxes are likely to be unimpacted by the works carried out due to the species tolerance of urban environments. It is recommended that a Precautionary Method of Working is created that covers the legal protection afforded to hedgehogs, how to identify them and where they are likely to be present and a pre-commencement walkover survey should also be carried out to determine if hedgehogs are present within the areas scheduled to be cleared. It is recommended that any ground excavations are covered at night to reduce the risk of hedgehogs getting trapped in pits (these measures can be required as part of the amended Construction Environmental Method Statement).

Nesting birds

- 122 The impacts on nesting birds are mainly due to the loss of habitat and degradation during the works. There will be an adverse effect on local bird populations during the works. It is assessed as a minor effect due to the retention of woodland habitat and mainly loss of amenity grassland and immature mixed woodland and some introduced shrub planting. Any necessary vegetation clearance will be undertaken (where possible) outside of the period that bird species are likely to be breeding (between March and August inclusive). If the vegetation is to be cleared between March and August inclusive, an ecologist will need to confirm the absence of active bird nests immediately prior to works commencing to avoid a breach of legislation (this requirement is included within the Construction Environmental Method Statement and will be required by a planning condition relating to this). If a nest is discovered, clearance or other construction works should be stopped immediately within a species-specific exclusion zone. Once it is confirmed that all fledglings have flown and ceased to return to the nest, the vegetation can be removed. The creation of new and diverse green habitat on site will increase habitat suitable for nesting, commuting and foraging birds allowing an increase of the bird population within the

site. The installation of a diverse range of bird boxes and the planting of species that produce berries or attract insects will also benefit the site for nesting birds (this can be included as part of the landscaping scheme and management plan required by condition). To mitigate for the loss of woodland, the retained and existing woodland will be enhanced both on and off site in accordance with the Biodiversity Net Gain Assessment and required by planning conditions.

Reptiles

- 123 All native UK reptile species; adder (*Viper berus*), common lizard, grass snake, sand lizard (*Lacerta agilis*), smooth snake (*Coronella austriaca*) and slowworm, are listed on Schedule 5 of the Wildlife and Countryside Act. The reptile surveys carried out in 2020 included the edges of the woodland parcels present on the site. No slowworms were discovered during these surveys within the site and as such further reptile surveys were not recommended. However, due to the proximity of slowworm record, it is recommended that a Precautionary Method of Working is created that covers the legal protection afforded to reptiles, how to identify them and how works needs to be carried out on site to minimising any risk of harm reptiles, if found (this can be required as part of the amended Construction Environmental Method Statement). The report recommends that any log piles or reptile refugia be removed from the suitable habitats prior to vegetation clearance and during the active season for reptiles to reduce the attractiveness of areas for reptiles and reduce the risk of hibernating reptiles on areas to be cleared. Dismantled refugia/hibernacula should be relocated in retained suitable areas. Any vegetation clearance of woodland, semi-improved grassland and tall ruderal or shrub habitats should be carried out under an ecological supervision in two phased cuts. The cuts should be separated by a period of at least 24 hours. The first cut should reduce sward height down to 150 mm, while the second cut should be cut down to the ground. All arisings from both cuts should be removed to prevent them from becoming attractive to reptiles once they become active in spring. If any reptile is found, the ecologist should move it to a hibernacula or refugia within the retained habitat, protected from any works. Hibernacula will be established in appropriate locations for such use and clearly marked. Should a reptile in hibernation need to be relocated, the animal should be placed in a cold box by an ecologist and transported immediately to a hibernaculum. The ecological supervision and the works should follow a Precautionary Method of Working (this can be included in more detail within the amended Construction Environmental Method Statement).

Great Crested Newt

- 124 Great crested newt is listed on Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). No evidence of great crested newt has been recorded within the Site to date. eDNA surveys were completed in 2020. Although the survey data is over two years old, Natural England has updated Standing Advice which states that great crested newt survey data submitted should be no older than 4 survey seasons. The validity of the survey information is therefore valid. If a great crested newt is found on the site during the works, then the works should cease, and an ecologist consulted. In this event, a Natural England European Protected Species Mitigation Licence would be likely to be required before works can be continued. Officers consider the Construction Environmental Method Statement should be amended to incorporate more detail on these protected species.

Other notable amphibians

- 125 Common toad is listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (as amended). Recommendations provided for

reptiles are applicable to amphibians. Any habitat piles should be removed prior to vegetation clearance to reduce the attractiveness of areas for amphibians. It is recommended that an ecologist is present during vegetation clearance to carry out a walkover survey. Any clearance of vegetation should be supervised. The cuts should be proceeded by a walkover by the ecologist and should be separated by a period of at least 24 hours. The first cut should reduce sward height down to 150mm, while the second cut should be cut down to the ground. All arisings from both cuts should be removed to prevent them from becoming attractive to newts. Officers consider the Construction Environmental Method Statement should be amended to incorporate more detail in this regard.

Notable Invertebrates

- 126 Any deadwood suitable for invertebrates such as stag beetle should be moved prior to construction commencing to areas of scrub and woodland elsewhere on the Site. Deadwood should be moved between April and September to avoid disturbing other species that may be using the structures such as reptiles and amphibians. Specimens of elm and blackthorn present on the site are suitable food for the caterpillars of brown hairstreak and white letter hairstreak and should be retained on-site or replanted where possible. Creation and enhancement of habitats as part of the proposed development will create a range of habitats to benefit invertebrates and a net gain for habitats will result in a minor beneficial effect for invertebrates. Officers consider the Construction Environmental Method Statement should be amended to incorporate more detail in this regard.

Biodiversity Management Plan

- 127 The Ecological Impact Assessment states a Biodiversity Management Plan that will take the form of a Landscape and Ecology Management Plan is to be prepared to ensure a long-term management of the habitats created on site and ensure a successful outcome for the biodiversity of the site and immediate surroundings. Surrey Wildlife Trust advises that this is secured through a planning condition. This should be in line with the biodiversity net gain assessment and reference offsite areas of woodland that is required to provide a biodiversity net gain. Officers agree and conditions can be attached to cover these points (see also Biodiversity Net Gain section below).

Non-Statutory Designated Sites

- 128 The Ecological Impact Assessment states that the close proximity of Barnard's Sandpit SNCI necessitates compliance with industry good practice and environmental protection legislation during site establishment works e.g. prevention of surface and ground water pollution, and fugitive dust management, noise prevention or amelioration and lighting control, which should be applied to minimise the potential for environmental pollution. The submitted Construction and Environmental Method Statement does not specifically reference Barnard's Sandpit SNCI, and measures required to protect it. Surrey Wildlife Trust advises the document should be amended in this regard. Officers can secure this via the condition requiring the amended Construction and Environmental Method Statement

Conclusion on impact on Ecology and Protected Species

- 129 The proposed development will give rise to a loss of the existing ecological value of the application site. More than half of the mixed woodland and the plantation woodland will be lost to facilitate the development according to the Ecological Impact Assessment. Based on the current landscape proposals, due to this and other habitat loss, the development will result in a net loss of 34% for area-based habitats. This clearly needs to be mitigated and the applicants proposed mitigation strategy and measures are considered in the next section of the report entitled Biodiversity Net Gain. The applicant has demonstrated that the proposal is unlikely to have any significant adverse impact on any statutory-protected and non-statutory protected species, though conditions are required to ensure adequate consideration is given to this aspect during construction and post development (controlled by planning conditions).

Biodiversity Net Gain

- 130 The original Biodiversity Net Gain Assessment submitted by the applicant was directed at achieving a 10% net gain to be achieved on and off-site, though no proposals for the off-site provision were included. To better inform the assessment of this issue Surrey Wildlife Trust, acting as Surrey County Council's ecological consultant, requested that the applicant submit further information as follows:
- a completed Biodiversity 3 Metric (the full metric excel spreadsheet)
 - more details on the proposals for the off-site area to be used for mitigation
- 131 Discussions with Surrey Wildlife Trust, officers and the applicant also clarified that the development plan requirements (Policy NHE2) for biodiversity on this site required only a *net gain* (not a specific figure of 10%).
- 132 The applicant submitted an amended Biodiversity Net Gain Assessment and the metric requested by Surrey Wildlife Trust which in summary states the following:
- A BNG assessment involves making a comparison between the biodiversity value of habitats present within the site prior to development (i.e. the 'baseline') and the predicted biodiversity value of habitats following the completion of the development (i.e. 'post-development'). The comparison is made in terms of 'biodiversity units', with a 'biodiversity metric' providing the mechanism to allow biodiversity values to be calculated and compared.
 - Biodiversity Metric 3.0 calculates the overall loss or gain of biodiversity of development projects by assessing the distinctiveness (i.e. type of habitat and its value), condition, extent and strategic significance of habitats on site pre- and post-development including any temporary or permanent loss of habitat. To achieve biodiversity net gain, the biodiversity unit score must have a post-development score higher than the baseline score.
 - When calculating the post-development biodiversity units, the metric includes a series of standard 'risk multipliers' to account for the inherent risk of creating and restoring habitats, the time taken to establish habitats and the location of the mitigation in relation to the habitats lost on site. The risk multipliers have the effect of reducing the unit value of the proposed habitats, which means larger areas, habitats of higher distinctiveness, and/or condition are required to offset the risks and achieve net gain.

- The metric assesses and generates separate outputs for area-based habitats (measured in habitat units) and linear based habitats, including hedgerows (measured in hedgerow units) and rivers (measured in river units).
- To claim a net gain in biodiversity, there must be an increase across all habitat, hedgerow and river units, the units cannot be summed to give an overall biodiversity unit value i.e, an increase in habitat and hedgerow units cannot be used to offset a loss in river units.
- Metric 3.0 requires that the strategic significance of all baseline and post-development habitats be defined. Strategic significance refers to strategic locations for local biodiversity and nature improvements, identified within local planning policies. As part of this assessment, the local planning policy documents that were reviewed to determine the strategic significance of the habitats on site comprise National Character Area 120: Wealden Greensand, Reigate and Banstead Local Plan: Core Strategy, Surrey Biodiversity Action Plan: Biodiversity and Planning in Surrey, Reigate and Banstead Borough Council Environment and Sustainability Strategy and MAGIC maps.
- Having carried out the assessment it was clear that reaching a 1% net gain *within* the application site will not be possible with on-site mitigation alone.
- However, the following recommendations will improve the likelihood that the full **on-site** biodiversity potential is reached and that a reduced area of off-site mitigation is necessary. Enhancing biodiversity on-site will help to enhance habitat connectivity for wildlife and provide a rich learning environment which promotes sustainable legacies. The following on-site recommendations are intended to improve the proposed development's biodiversity net loss
- **Grassland** An uplift in ecological value can be achieved through the enhancement of 0.22 ha of retained 'modified grassland' to 'other neutral grassland' in moderate condition. 'Other neutral grassland' is of higher distinctiveness than 'modified grassland' and so this enhancement would satisfy Metrix 3 trading rules for low distinctiveness habitat loss. Enhancing 'modified grassland' to 'other neutral grassland' would also contribute to improving ecological connectivity to habitats of importance off-site (this includes areas in Habitat Network Zone 2). Additionally, a higher distinctiveness grassland would provide habitat for several species including reptiles, ground nesting birds and invertebrates. An uplift in condition of all created 'modified grassland' on-site (0.13 ha) from poor to moderate would contribute an uplift of 0.20 habitat units. **Added value:** It could also be considered that certain areas of grassland are allowed to grow naturally and that natural pathways are used to minimise the requirement of less-sustainable materials like concrete. Natural pathways could provide easy access to areas of natural rewilding. These areas could become the focus of future school projects and activities.
- **Woodland** The enhancement of 0.28 ha 'other woodland; mixed' on-site, from a moderate to good condition would contribute an uplift of 0.9 habitat units. Focusing on woodland enhancement, part of which is in Network Enhancement Zone 2, would help promote a more established, and ecologically connected, corridor to other habitats of importance. Habitat condition data collected during a site visit in 2021 suggests that this woodland could be improved by establishing a varied age structure and introducing more deadwood to the habitat. The introduction of deadwood would also

promote good quality habitat for invertebrates, such as the stag beetle. An introduction of species such as honey suckle would also provide a good habitat for invertebrate communities and dormice. **Added value:** There is opportunity to anticipate the future implementation of a Natural World GCSE39 and support the teaching of the subject to junior school-age children. It is suggested that the educational nature of the development is used to encourage applied, immersive, and engaging teaching on environmental topics. The retained woodland presents an opportunity for the installation of bird and bat boxes. These could be designed to include cameras used to monitor and livestream wildlife interactions around the site, combining digital viewership (increasingly common in children) with environmental education and minimising invasive disturbance to species. Strategically positioned steppingstones (or an activity trail with wood mulch pathways), or sustainable timber benches could be placed throughout the wooded area and supplemented with habitable environments for wildlife and plants. Additionally, the inclusion of bug hotels will provide a sense of discovery and adventure for young children studying at the school. These could be formed using recycled materials and provide valuable hands-on learning, highlight the importance of sustainability and position the development to set a future standard to be upheld in the future.

- In addition to the recommended on-site enhancements detailed above, a further 3.63 habitat units is required to achieve a 1% net gain. This would need to be provided off site through off-site enhancement.
- An off-site area in the northern part of the Woodhatch site has been identified as being available for off-setting and is within the ownership of the applicants, Surrey County Council. The area is separated into two parcels by a strip of woodland through the centre. Due to the shortfall in BNG units, both areas are required and have been assessed together (total area equating to 2.21 ha) to determine the overall BNG units available. The area had been previously surveyed by the applicants ecological advisors and data from this survey was available for the BNG assessment, however, some assumptions were still required as the previous survey was not carried out using BNG methodology against the condition criteria or utilising UKHabs classifications. For example, the 'lowland mixed deciduous woodland' present within the off-site area has been assumed to be of 'Moderate' condition due to the lack of condition data available, however, it is known that there are parcels of woodland of this type within the site boundary that are of 'Good' condition. This western parcel is dominated by 'modified grassland' with the western boundary comprising 'lowland mixed deciduous woodland'. A line of trees is also present along the southern boundary bordering the current car park to the south, this southern grassland area currently has a series of beehives that are to be retained. The eastern parcel is dominated by lowland mixed deciduous woodland with a large section of modified grassland on the eastern side and an area of 'mixed scrub' on the northern boundary boarding the private gardens of adjacent housing.
- It is proposed with this application that the habitats present on site will be enhanced to provide biodiversity units to off-set units lost in the proposed school development. All 'modified grassland' will be enhanced to 'other neutral grassland' of 'Moderate' condition. This enhancement will enable the southern area of the western parcel to continue being utilised for housing the beehives, as management plans can take the required utilisation into consideration. The 'mixed scrub' along the northern boundary is to be

enhanced to 'Good' condition and all woodland is to be enhanced to 'Good' condition. The enhancement of woodland to 'Good' condition will be dependent on the woodland present at baseline being of 'Moderate' condition as assumed however, it is still considered to be possible to provide enhancements to the woodland in either case as it is extremely unlikely that all condition criteria would be met. To provide partial compensation for the removal of trees within the application site, a line of trees will be created along the southern boundary of the right hand parcel, to replicate that present on the left at baseline.

- With the inclusion of the off-site area, the Proposed Development would result in a net loss of -6.25% equating to the requirement of 6.41 habitat units to achieve a 1% net gain. For this option, the trading rules for the Medium and High distinctiveness groups are not satisfied as there is still a loss of 'lowland mixed deciduous woodland' and 'other woodland; mixed'.
- The incorporation of the off-site area in addition to enhancements recommended on site achieves a **6.94% net gain**, which satisfies the 1% requirement. However, trading rules for the Medium and High distinctiveness groups are still not satisfied as per the description above.
- Various options have been explored and have concluded that it will not be possible to achieve net gain whilst also satisfying all trading rules on site or when the off-site area is incorporated due to the difficulty of creating High distinctiveness habitats resulting in the delivery of less units. However, an option has been explored that results in a net gain and satisfies the Low and Medium trading rules. Additional off-setting will be required to satisfy the High distinctiveness trading rules. This option utilises on-site enhancement recommendations along with the off-site compensation incorporating the creation of 0.6 ha of 'traditional orchards' at a 'Moderate' condition. The 0.6 ha will be deducted from the available land to be enhanced to 'other neutral grassland'. The net gain is lower due to the increased difficulty to create 'traditional orchards' in comparison with 'other neutral grassland' but this creation results in the 'Medium' distinctiveness trading rule to be satisfied.

133 Surrey Wildlife Trust, acting as the Council's ecological advisors, has considered the applicants submission in respect of Biodiversity Net Gain and has advised as follows. Through the preparation of ecological reports and biodiversity metrics by the applicant it has been established that it will not be possible for the project to demonstrate a biodiversity net gain using a biodiversity metric, primarily due to the failure to satisfy trading rules. Surrey Wildlife Trust advises SCC that trading rules must be satisfied when a biodiversity metric assessment is used to demonstrate the feasibility of a project to provide a biodiversity net gain. They acknowledge that the Applicant has demonstrated a commitment to seeking a solution to the trading rule and biodiversity net gain issue. Despite discussions between the Applicant, Vail Williams, AECOM (The Applicant's ecological consultant), SCC planning officers and Surrey Wildlife Trust, a solution has not been found. Therefore, they must report that the project cannot demonstrate a biodiversity net gain, using a biodiversity metric calculator, due to the loss of lowland mixed deciduous woodland which is a Habitat of Principal Importance listed under the Natural Environment and Rural Communities Act 2006.

134 Surrey Wildlife Trust go on to advise that at the time of determination – February 2023, secondary legislation of the Environment Act (2021) has not been passed therefore, and in the absence of a local plan for Reigate and Banstead Borough

Council which stipulates a net gain percentage requirement, Surrey County Council in determining this application cannot enforce a mandatory 10% BNG requirement. Surrey Wildlife Trust have consistently throughout discussion recommended that the Applicant can at least demonstrate no net loss, or a 1% net gain. This is partly based upon a Planning Inspectorate decision where the inspector found that a 1% biodiversity net gain would be “policy compliant” based on Paragraph 174 of the National Planning Policy Framework. However the proposal in this case cannot through *quantitative* means (by application of Metric 3) demonstrate a biodiversity net gain of at least 1%.

- 135 The amended Biodiversity Net Gain Assessment submitted by the applicant (AECOM, December 2022) concludes that “the proposed interventions offer significant gains in biodiversity above the 1% requirement, enhance existing woodland within the Reigate Borough, offer multiple benefits within the locality and provide the opportunity for the project to deliver a biodiversity legacy”. The proposed interventions include enhancements to woodland habitat on and off-site and the enhancement of modified grassland. The purpose of this evaluation by AECOM is to attempt to demonstrate to SCC, and the planning committee, that the project has the potential to provide some benefit to local ecology and biodiversity, despite the trading rule failing. Surrey Wildlife Trust have advised that proposals to enhance habitats such as the on and off-site habitat would benefit local ecology, if carried out and implemented correctly.
- 136 Surrey Wildlife Trust advises that if planning permission is granted, the recommendations within the Biodiversity Net Gain Report and Ecological Impact Assessment are secured by a planning condition, such as through a Landscape and Ecological Management Plan.
- 137 Surrey Wildlife Trust also advise that they have had regard to further comments made to them by the applicant’s planning advisor suggesting that the *Planning Balance* must be struck between the ability to prevent loss and the available area to mitigate the biodiversity impacts of the proposals. The applicant’s planning advisor confirms that it is not practical to look outside of the Woodhatch site within the locality due to lack of land owned and controlled which meets the lowland mixed deciduous woodland requirement. In the applicants planning advisors view the proposal *works hard* not only within the red line boundary but also on land northeast and west of the County Council HQ buildings (blue line). This approach follows the ten ‘Principles of Net Gain’ and the mitigation hierarchy where possible” and “The Planning Balance also will take account of the other benefits the proposals bring as cited within the application submission including need, vision and fit for the future education provision”
- 138 Surrey Wildlife Trust therefore advise SCC that the planning committee should be made aware that the project cannot demonstrate a biodiversity net gain of at least 1% through a biodiversity metric, although proposals have been provided to enhance existing and off-site habitats. In the absence of secondary legislation of the Environment Act (2021) being passed, the project should be assessed on a planning balance, based on existing national and local planning policy, such as the National Planning Policy Framework (2021). Paragraph 174 of the National Planning Policy Framework (2021) states “*Planning policies and decisions should contribute to and enhance the natural and local environment by.... 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*”.

- 139 Officers have considered the proposal together with the comments of Surrey Wildlife Trust and other interested parties on this issue. Officers accept that the Ecological Impact Assessment undertaken by the applicant identifies reptiles, bats, breeding birds, other mammals and certain habitats as the biodiversity features within the site that could be adversely impacted during clearance, construction and the operational phases of the proposed development. However, with the implementation of the mitigation measures outlined by the applicant, supplemented by additions made by the Surrey Wildlife Trust (which can be secured by planning conditions), there are unlikely to be any adverse *significant* effects to species and habitats as a result of the proposed development. However the loss of the site itself including a significant amount of existing woodland, including Priority Habitat Network woodland requires compensation and although the applicant has proposed measures to mitigate this impact on land to the north of the Woodhatch site they are unable to quantify an overall *net gain* using an accepted biodiversity metric tool therefore ostensibly there will be a net loss of biodiversity as a result of this development which must be considered in the planning balance. However officers consider that subject to the implementation of the mitigation measures, proposed both within and off-site, the residual effects on biodiversity will be '*Not Significant*'.
- 140 Officers recognise that considerable efforts have been made by all parties to seek to quantify in an accepted measurable way that the proposal gives rise to a positive impact, or *net gain*, on biodiversity. As stated above the applicant has put forward tangible and deliverable measures to mitigate/compensate for the loss of the ecological value of the existing site, including further enhancements on site and additional off-site measures on land near the application site on other land in the applicant's ownership. It is acknowledged that it has not been wholly possible, using Biodiversity Metric 3 as the tool of measurement (as requested by Surrey Wildlife Trust in accordance with Natural England advice), to demonstrate that a clear biodiversity net gain is achieved, largely based on the existence of 'trading rules' set out within that metric.
- 141 Officers note that with the incorporation of the off-site area in addition to enhancements on site the applicants consider that a **6.94% net gain** is achieved, which satisfies the 1% requirement set out in Development Plan Policy. However, *trading rules* set out within Biodiversity Metric 3 tool for Medium and High distinctiveness groups are not satisfied in this case as there will be a loss of lowland mixed deciduous woodland on the application site (which is a Habitat of Principal Importance listed under the Natural Environment and Rural Communities Act 2006) which will not be replaced.
- 142 Officers consider that whilst the Biodiversity Metric tool is useful as a way of providing a methodology for calculating biodiversity net gain it can and should only be used to *inform* decision-making. In this case whilst a measured quantification of net gain has not been able to be provided by using the Metric, officers consider that the applicant has clearly demonstrated a commitment to maximising the biodiversity potential on-site as part of the planning proposals and has offered enhancement of other land off site but in close proximity to compensate and mitigate the ecological loss.
- 143 Officers agree with the applicants and Surrey Wildlife Trust that the apparent 'shortfall' in respect of this application arising out of using the Biodiversity Metric Tool has to be considered in the overall planning balance of the proposal and against the positive aspects it will deliver for the local area. Officers consider that both the on-site and off-site measures proposed by the applicant to mitigate ecological impact do go a considerable way to compensating for the ecological loss and are meaningful

and appropriate. The measures will require the submission of further detailed plans and a Landscape and Ecological Management Plan of both the site and the off-site land and these can be required by a planning condition. Subject to these conditions officers are of the view that the proposal has demonstrated there will be at worse a *less than significant* impact on ecology and biodiversity which has to be considered by the decision maker in the planning balance against the educational need for this school and the lack of suitable sites within the vicinity.

- 144 In conclusion officers consider that though the applicant has put forward a proposal that has fully considered the ecological implications and which does minimise ecological impact it does not fully accord with development plan policy in this regard and there remains an overall loss of biodiversity including Priority Woodland Habitat which will not be replaced and which has to be considered in the planning balance.

DESIGN AND VISUAL APPEARANCE/URBAN OPEN SPACE

Reigate and Banstead Core Strategy 2014

Policy CS2 Valued Landscapes and the Natural Environment

Reigate and Banstead Development Management Plan 2019

Policy OSR1 – Urban Open Space

Policy DES1 – Design of New Development

- 145 Officers consider it is appropriate to assess the design and visual impact of the proposal in conjunction with the Urban Open Space designation applicable to the site as policy considerations link these two aspects.
- 146 Paragraph 130 of the NPPF (2021) states that planning decisions should ensure that developments...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....are visually attractive as a result of good architecture, layout and appropriate and effective landscaping....are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change and create places that are safe, inclusive and accessible and which promote health and well-being.
- 147 Core Strategy Policy CS2 requires developers to protect and enhance the Borough's Green Fabric including, inter alia, urban green spaces. Reigate and Banstead Local Plan Development Management Plan Policy OSR1 states that any development which would result in the full or partial loss of designated Urban Open Space will only be permitted in exceptional circumstances where the loss of openness resulting from the proposed development would not have an adverse effect on local character, visual amenity or ecological value. Where such circumstances are permitted the policy requires either:
- that clear evidence to demonstrate that the site is surplus to requirements and does not make a significant contribution to the recreational, community, ecological or amenity value of the area
 - Provision is made for appropriate and suitably located replacement open space of the same type and of at least equivalent quality and/or quantity. Replacement open spaces should be located as close to the lost open space as possible

- The proposal is for the expansion of an existing school, the need for which clearly outweighs the loss of the urban open space

148 Reigate and Banstead Local Plan Development Management Plan Policy DES1 that all new development will be expected to be of a high-quality design that makes a positive contribution to the character and appearance of its surroundings. Planning permission will be granted for new development that promotes and reinforces local distinctiveness and respects the character of the surrounding area. Part 11 of the Policy states that development should be accessible and inclusive for all users, including people with disabilities or mobility constraints.

Design and Visual Appearance

- 149 The applicants have submitted a Design and Access Statement as well as a Landscape and Visual Impact Assessment with the application.
- 150 The Design and Access Statement describes the evolution of the proposal as submitted. It states that the building which is proposed on this site is modern and purpose built and has evolved following detailed consultations with the existing school to facilitate their detailed education focussed requirements as well as meeting the Department for Education's area standards set out in Building Bulletin 103 (BB103). The detailed siting of the building was further developed in its response to the specific constraints of the application site area and its surrounding context, with emphasis on limiting the impact of the overall massing on the Belvederes development as well as being sympathetic to the listed Woodhatch Lodge. The design was then articulated to create a further variation in height to set the building mass away from the Belvederes at second floor level and place large spaces closer to the main approach to the building from the north. The general topography in relation to neighbouring buildings is indicated on the applicants drawing below (site viewed from the south).



- 151 The proposed building steps up from the approach down the hill, from the main site entrance. The highly serviced areas, such as kitchen and plant room have a

requirement for deliveries and cart away. These facilities have been placed away from the main approach to allow for a generous and welcoming approach to the building.

- 152 The overarching concept of the building has been developed through the following key drivers:
- Creating new and playful identity to the junior school
 - Minimising the impact on the surrounding residential properties
 - The need to create a safe and secure site, building around passive supervision
 - Maximising the connections between the external and internal spaces
 - To ensure safeguarding of pupils
 - To ensure support spaces are close to classroom clusters
 - To create a natural progression through the building
 - To provide a sufficient space for whole school assemblies
 - To allow building to be a teaching tool for the pupils, including its sustainability.
- 153 In respect of design the overall approach of the applicants seeks to create an elegant, yet playful appearance for the new junior school. To link the new school with the Surrey County Council's Headquarter building a buff brick is proposed at ground floor level and for the whole of large space volume. This also compliments the materials palette used for the adjacent Belvederes residential apartment block. On the upper levels of the teaching block a dark grey cladding has been used with coloured strips. The colours have been selected to avoid a dominating effect on the surrounding properties. When viewed from distance, the dark colours blend into the background better than lighter ones, so a dark grey tone has been selected as a base colour for cladding. To create accents and a slightly playful feel to the junior school, coloured strips have been added that match overall school branding. Red trims have been used to highlight the deep windows reveals within the building. The main building entrance has been signified by a recess in the overall building volume at ground floor level. This creates a clear entrance point on the approach to the building. The colours of materiality for the school building have been selected to be muted and well-mannered at the same time achieving playful and distinctive high-quality design within its setting and match the school branding colours.



Visualisation of elevation towards Cockshot Hill

- 154 The following principles have been applied to the building for external appearance:
- Use of light-coloured brick to match surrounding properties, Woodhatch Place and the Belvederes
 - Dark grey cladding to assist with blending in when viewed from distance

- Coloured cladding strips to create playful appearance and create interest
- Red metal trims to highlight window openings and break up the overall relief
- Teaching space windows include opening sections as well as louvres connecting to ventilation units
- The large spaces (dining, small and main hall) use curtain walling to express their double height nature externally as well as creating a modern link to the Reigate Priory large tall windows in large hall
- Staff and support spaces use smaller and narrower windows
- Creation of new identity for the school in the new settings, building upon current branding

155 The Landscape and Visual Impact Assessment aims to:

- Establish a clear understanding of the site and its setting in respect of landscape character and visual amenity;
- Establish an understanding of the proposed development in terms of its relation to landscape character and visual amenity;
- Identify potential direct and indirect effects of the proposed development upon the landscape;
- Identify potential effects on visual receptors;
- Determine mitigation measures necessary to reduce/ eliminate any potential adverse effect on the landscape or visual amenity arising as a result of the proposed development;
- Identify opportunities for enhancement measures; and
- Establish the likely residual effects of the proposed development.

156 The methodology used to do this follows a standard approach, namely establishing:

- The baseline conditions, i.e. the character, quality, value and relative sensitivity of the landscape;
- The type and relative sensitivity of visual receptors;
- The sensitivity to change of the landscape in relation to the proposed development;
- The predicted magnitude of impact that the proposed development would bring, allowing for mitigation measures, upon the landscape and upon visual receptors; and
- Assessing the significance of effect that would occur, by aggregating the predicted magnitude of change with the sensitivity of the landscape and visual receptors respectively.

157 The main conclusions drawn through this detailed assessment are:

- Most of the existing tree planting along the western boundary will be retained except for some minor loss at the existing entrance and proposed exit onto Cockshot Hill. The woodland areas to the north-east of the site will be retained and new tree and thicket planting provided to soften the northern and southern boundaries and help to mitigate any visual impact, while also replacing trees removed within the site to facilitate the development.
- The development will therefore sit within an existing robust landscape boundary framework where the majority of the perimeter vegetation will be retained, and new planting will provide further enhancement. The semi-mature tree blocks within the site are of limited landscape value and there are no other landscape features within the site.

- The findings of the landscape and visual assessment concludes that there will be no long term significant adverse effects arising as a result of a proposed school development and it can be considered as being marginally beneficial due to the landscape enhancements and improved management that will be brought into a site which currently, apart from its retained boundaries, is limited in ecological diversity.
- The landscape and visual effects of the proposals have been assessed and found to result in a combination of slight, minor, moderate and major adverse and neutral effects at the post construction stage, and these are reduced to slight to minor adverse, neutral and minor beneficial residual effects with the maturing of the planting introduced as mitigation measures. Therefore, the overall conclusion is that there are no significant long term adverse effects, the proposed development can be accommodated within the landscape character and visual amenity and it is acceptable in terms of landscape and visual impact.
- The post construction stage will lead to a major neutral effect on the site features and a moderate to minor adverse effect to the setting and character of the area in the vicinity of the site, due to the introduction of proposed vegetation and ecological enhancements. Following 15 years' growth of the introduced mitigation measures to the development, the residual landscape effects will be minor beneficial on the site features and minor to slight neutral on the setting and character of the area in the vicinity of the site.
- The residential receptors in closest proximity to the site are the apartments of The Belvedere facing the site, which will experience major to moderate adverse significant visual effects at the post construction stage. Other dwellings with partial or glimpsed views of the development will experience diminishing visual effects. However new planting towards the perimeter of the development that is introduced as part of the proposals will lead to diminishing effects of minor adverse effects at most, as the planting matures.
- Post construction, the visual effects to Surrey County council offices and grounds will comprise moderate to minor adverse effects. Following 15 years' growth of the mitigation provided by additional planting along the northern boundary, views will become increasingly softened with only glimpses of the new building remaining, and the residual effect will be minor adverse to neutral on these views.
- Post construction, the visual effects on the transport routes comprising close range urban roads (Cockshot Hill, Woodhatch Road and Hornbeam Road) will comprise a minor to slight adverse significance of effect. New planting towards the perimeter of the development will gradually mature, softening views and leading to a slight adverse to neutral significance of residual effects.
- Post construction, the visual effects on the transport route of Lye Lane will comprise a slight neutral significance of effect. Following 15 years' growth of the mitigation provided by additional planting along the western boundary and within the development, views towards the site from Lye Lane will become increasingly screened, filtered and softened. The residual visual effect will be a slight beneficial significance of effect on views from Lye Lane.

- The development proposals are in accordance with Reigate and Banstead Borough Council's Local Plan policies regarding landscape and visual amenity. A proposed development will not have a significant detrimental impact to the character of the landscape and townscape as the layout, materials and planting are designed to recognise and protect the local landscape and settlement within the context of the site.
- Landscape and visual mitigation features such as new and reinforcement planting around the perimeter and a high-quality landscape framework across the site, will enable the development to integrate into the local landscape character of the area, improve the immediate landscape condition, and provide benefits to the visual amenity.

158 Reigate and Banstead Borough Council has raised objections to the proposal with one of the grounds of objection stating that *'the scale and design of the extension (sic) poorly relates to the parkland and surrounding buildings which combined with the sheer mass and materials of the building, together with the new fencing on Cockshot Road (sic) would harm the character and appearance of the area.'* The officers report expands on this reason stating as follows:

Concern is raised with regards the design of the school and its impact upon the character and appearance of the area, the views and landscape from the South of Reigate. The siting, height and scale of the school is identified as particularly harmful as it would poorly relate to the park and surrounding buildings, combined with the sheer mass and materials the building would harm the character and appearance of the townscape.

The building extends some 77 metres in length and 23 metres in width at its widest part and would have an overall height of 12.7 metres. The part 2 storey element would have an overall height of 7.63 metres. The school building would be finished in a buff brick for the 2 storey element and the ground floor of the 3- storey element with the upper floors of the 3 storey element being finished in cladding in the school colours of red and white with grey stripes.

The height of the building is considered to be out of scale with the park and surrounding buildings, due to its 3 storey height and siting on a newly raised high bank which exacerbates longer views and impacts resulting in substantial harm within the park and setting of Woodhatch Place but also impact outside the park in terms harming the backdrop to listed buildings, and its visibility above the tree line, in gaps and in winter views, and harming the approach to the Reigate Conservation Area, as well as wider views from the south including the A217 and impacting on the appearance of the Greensand Ridge backdrop.

It is acknowledged that there are modern interventions within the surrounding landscape, but each of these are considered sensitively designed and do not cause harm such as the proposed. The SCC office buildings were designed to be recessive and neutral, and were set back so the 18th century house had prominence. The Belvedere buildings were designed to respect the low scale of the park and maintain the axial lie between Woodhatch Place and the end of the park with the woodland planting at the time designed to enhance the historic garden setting. The new school building at its higher level is disruptive and striped cladding emphasising the out of scale massing of the proposed

school building, unbalances the woodland setting and towering over the Belvedere buildings.

This new building is considered contrary to Policy DES1 of the DMP as new development should respect the character of the surrounding area, which it does not in this case'

- 159 Surrey County Council's Landscape Officer has considered the proposal and generally agrees with the methodology used by the applicant in this document. The landscape officer advised that the submitted landscape assessment had not specifically identified the historic parkland at Woodhatch (wider SCC site and extending into the application site) as part of the landscape receptors 'Setting and character of local area in the vicinity of the site' and 'Application site landscape features, principally boundary trees, tree blocks and grassland'. Whilst he accepted that this was addressed within the submitted Heritage Statement, in his opinion it would be appropriate to include the historic parkland within the landscape assessment for both of these landscape receptors. The applicants responded with the comment that as stated in the consideration of Landscape receptors (para 2.36-2.37 p7) the setting of the locally listed building Woodhatch Lodge (which is principally the historic parkland at Woodhatch) was referenced as a potential landscape receptor but deferred to the Archaeological Desk Based Assessment which contains the Heritage Statement, and which accompanied the application. They pointed out that as recommended in the Guidelines for Landscape and Visual Impact Assessment, Second Edition, The Landscape Institute/ Institute of Environmental Management and Assessment, 2002 para 5.11 "*The sharing of relevant baseline information should not be confused with the need for separate cultural heritage appraisals ... or there will be a danger of both double handling and inappropriate judgements by non-experts. It is particularly important that responsibilities are clear in considering any effects on the settings and views for historic buildings Conservation Areas and other heritage assets.*" The applicants landscape advisor therefore considered that it was appropriate guidelines to not include the historic parkland as the setting of Woodhatch Lodge in the landscape assessment. Officers accept this view and the impact arising from this aspect is considered in the following section of the report.
- 160 Surrey County Councils Landscape officer also commented that the submitted Landscape and Visual Impact Assessment judges there to be a *moderate* to *minor* adverse effect on the setting and character of the area (landscape receptor 1) post-construction, which he broadly agreed with; however it also judges there to be a '*minor to slight neutral*' residual effect (i.e. at 15 years post-completion) on this landscape receptor. In his opinion it is not possible to have a '*minor to slight neutral*' effect where a neutral effect is simply neutral and cannot be qualified. The applicant was asked to clarify this and has stated that such a qualification can be made where there is a level of change that is *neither* adverse nor beneficial.
- 161 The applicant did agree that an error had been made in the applicants document in relation to the contradiction between the residual assessment of the application site features in Table 8 and the residual assessment as stated in para 5.9. The intended assessment was that in the table of *minor beneficial* (confirmed in an e-mail from the applicant agent dated 15 November 2022)
- 162 Turning to some of the detail of the scheme, the landscape officer noted the following:
- Extensive lengths of new 2.4m high mesh fencing are proposed to provide the boundary of the school site. Whilst such fencing is relatively transparent, he

was concerned by its potential harmful impact on the historic parkland character of Woodhatch, including on the internal boundaries and particularly where it cuts straight across open grassland in the north-east of the site. He considers that additional specimen tree planting should be required here to screen and soften the impact of the fencing (if the fencing is deemed essential). As stated in previous sections of this report this was discussed with the applicant the additional planting who has agreed to additional planting to the north of the fencing on land outside of the application site. The detailed landscaping for the site has yet to be submitted so this will be secured by way of a planning condition.

- 3m high solid acoustic fencing is proposed along the Cockshot Hill boundary, which would be quite a dominant feature abutting the footway with no opportunity to soften it via new planting due to the site and footway constraints. The applicant was asked to reconsider this but concluded it was necessary for noise attenuation. Officers accept the applicants view but agree that the fence would be prominent in the street scene and that careful consideration was required as to its nature and colour. A condition requiring final details of the fence for further consideration is recommended.
- The proposal will give rise to a major adverse visual effect on some apartments of The Belvederes post-construction (this has also been raised in representation received from occupiers of those dwellings). Verified Views VP01 and VP10 in the document demonstrate the likely change in the view in the vicinity of The Belvederes. The construction of the all weather surface sports pitches in close proximity to The Belvederes would also require limited raising of ground levels (shown in Site Section A-A), plus the introduction of 2.4m high weld mesh fencing along this boundary. With regard to residual visual effects (15 years post-construction) the LVIA considers that the embedded mitigation comprising boundary thicket and tree planting would reduce the visual effects to minor adverse for the range of residential receptors assessed, including The Belvederes and other properties slightly further away. Whilst there would be some additional screening provided by new planting shown on the submitted Planting Plan, this would be limited in the case of The Belvederes as only lower-level thicket and hedge planting is proposed along the boundaries with this site. Without additional tree planting along these boundaries, it is unlikely there would be a significant reduction in the major to moderate adverse visual effects identified immediately post-construction, particularly if the retained group of Raywood ash were to decline due to disease or other factors such as old age. The applicant was asked to provide additional tree planting within the 'thicket planting' zone separating the proposed school building from The Belvederes. New trees would have to be relatively small stature species such as fastigate field maple, which are fairly robust and can cope with a constrained planting environment. This has been agreed and can be controlled by condition.
- For other visual receptors, the Landscape and Visual Impact Assessment shows that the upper parts of the proposed school building would be visible from a number of locations within the surrounding area, e.g. Cockshot Hill, Hornbeam Road, Woodhatch Park to the south and from within the SCC grounds at Woodhatch Place. It would not be possible to fully mitigate (via new planting) the presence of the new building within these and other local views due to its height, so the upper parts of the building would be a permanent new presence within the street scene (and in views from the SCC grounds). The

Landscape Officer considered that a more sensitive approach to the external design and materials of the school building could have been taken, for example through the use of engineered timber cladding to the upper levels which would develop a soft patina over time and help integrate the prominent building within its green surroundings. Officers discussed this with the applicant who commented that during the design development numerous iterations of the external appearance were presented to the client team, the school and Surrey County Council. The school expressed a wish for a playful yet elegant solution and were keen to incorporate the school colours within the external appearance of the building. The light-coloured buff brick was selected due to similar colour use within close proximity of the proposed school building both adjacent Belvederes residential building and Surrey County Council offices use this as main material/colour. The metal cladding was selected due to its durability and colour options to address school's aspirations on the appearance. The base colour was selected as dark as typically darker colours blend better when viewed from distance. The coloured "ribbon" wraps around the building however to limit the impact on the immediate residents at Belvederes the coloured strips have only been used at lower level where these would be partly masked by trees. Timber cladding would require more regular maintenance than the cladding proposed. Timber may experience mould growth due to the proximity of the retained trees and long exposure to wetting without drying in shaded areas of the elevations. Where the building is close to the boundaries a fire coating would be required which can alter appearance of timber against other elevations. Furthermore depending on products and coatings used timber may not meet the standards and life expectancy set by the Department for Education in their Output Specification. The verified views demonstrate the scale and massing of the building in context however does not provide accurate reflection of the materiality used. These are better presented within the Design and Access document. Officers have carefully considered this point. The proposed building is large in scale and the design concept for it (as considered in more detail in the Design and Visual appearance section of the report) is to create a modern building reflecting its use. The use of coloured cladding (in the school colours) is designed to break up the mass and add a note of playful interest to its exterior and it is accepted that this perhaps makes the building more visually prominent. However the key vantage points where the building will be most visible in the context of its parkland setting is *within* the Woodhatch site itself which has limited public access. In view of this officers do not consider that there is a strong case to seek amendments to the design. Officers accept the applicants comments on this and consider a bold modern approach on this site is similar to that used for the Canon building and the residential apartment block The Belvederes.

- For the long-range viewpoints beyond the built-up area of Reigate there would be either a negligible or no visual effect as the proposed building would either comprise a negligible part of the overall view or would not be visible.
- The provision of a biodiverse green roof in combination with solar panels for the proposed school building is to be welcomed. Should planning permission be granted, further details should be provided by condition including section drawings showing the depth and type of substrate and details of planting. Depending on the engineering detail and structural loading for the roof, it

would be preferable if a uniform sedum mat was not specified as this is not particularly beneficial for biodiversity. Ideally, a deeper substrate should be used allowing the use of plug planting or similar, and invertebrate hibernacula such as log piles. A reputable blue/green roof contractor should be used to advise on the engineered roof layers together with appropriate integration of the solar panel mounts.

- 163 Having regard to the advice in paragraph 130 of the National Planning Policy Framework the applicants have designed a building which, in accordance with the brief, will function well as a new school whilst working within the limitations of the site. This is not just for the short term but over the lifetime of the development. The building itself has been designed to be *fit for purpose* but with an external design to promote some identity for the proposed occupiers by reflecting the school's colours. The setting of the site will be enhanced with additional landscaping. It is acknowledged that the design of the building is strident and modern but cues have been taken from both the Belvederes apartment building and the Woodhatch main building, both of which are of modern design.
- 164 Officers consider that the siting and visual appearance of the proposed development would have some impact in the landscape in general with the removal of a considerable number of existing trees, the presence of a new and vibrant structure in the wider landscape and the introduction of new boundary fencing and screening. However the most prominent and valuable trees are being retained and have been incorporated into the design of the proposal and will be supplemented with additional trees and landscaping planting (controlled by planning condition).
- 165 Officers consider this impact is not adverse or significant but has to be considered in the overall planning balance and the need for the school.

Urban Open Space

- 166 The site is designated as Urban Open Space in the Development Management Plan the full or partial loss of which will only be permitted in exceptional circumstances and where the requirements set out in paragraph 147 above are met.
- 167 The applicants have submitted an Open Space Assessment with the application which makes the following key points:
- The proposed site for the relocated school is designated as Urban Open Space within Reigate & Banstead's Development Management Plan (DMP) (Regulation 19) as part of their Urban Open Space Assessment and Review (2017, updated May 2018), and therefore benefits from enhanced protection from development.
 - When the latest Urban Open Space Assessment and Review was carried out (2017), the site was occupied by Canon UK and was not open to the public.
 - The undeveloped land within the boundary of Woodhatch Place is designated as Urban Open Space (UOS). This comprises the area to the north (site no. 131) and to the south (site no. 130) of the Council buildings and associated car parking area. It is the area to the south of the Council buildings, referred to as 'Canon UK Southern Field' within the Development Management Plan, which forms part of this Open Space Assessment. The proposed site boundary within the southern site is shown on the below extract from the RBBC policy map.



- Access to the site is limited to the formal, gated entrance to the Council offices. The perimeter is otherwise defined by secure fencing or boundaries to private residential properties
- Under the National Planning Policy Framework (NPPF), there is a legal requirement for planning applications to be determined in line with the Local Development Plan. The only exception to this is where material considerations indicate otherwise.
- The justification for Development Management Policy OSR1 (at paragraph 2.27) recognises, however, that in some exceptional circumstances development on urban open space might be acceptable, for example where this land is no longer required or the proposal would provide community benefit which would outweigh the loss of the open space. Policy OSR1 allows for exceptional circumstances to be demonstrated where certain specific criteria can be satisfied.
- The Development Management Plan also states in regard to Policy OSR 1 (at paragraph 2.28) that *'It is proposed that the Council takes a proactive, positive and collaborative approach to meeting the requirements of local schools: this reflects the importance which national policy places on the potential need to expand and alter schools.'*
- The Urban Open Space designation of the Woodhatch site was renewed as part of Reigate and Banstead Borough Council's Urban Open Space Assessment and Review in 2017. This review reassessed sites formerly designated as Urban Open Land in the Borough Local Plan 2005 as well as potential new sites to determine which local open spaces should be formally designated as Urban Open Space in the Council's Development Management Plan, which was formally adopted in 2019.
- As a baseline for assessment, an initial screening principle has been used to determine which sites can be considered for designation as 'Urban Open Space', stating they must be 'substantially undeveloped and possess a character which is distinguishable from the surrounding urban context'.

According to this principle, 'openness' or lack of development on a site can provide 'relief' within a built-up urban setting

- Sites which passed the screening principle were then assessed against three principles to determine the 'value and contribution of sites to the local environment and quality of life'. Priority for designation of the Woodhatch site has been awarded as follows under these three principles:

Principle 1: Sites providing formal public access to natural green space or opportunities for the public to engage in outdoor sports, recreation, play or food growing should be considered a priority for protection – **Medium priority**

Principle 2: Open spaces forming an integral part of local character, townscape and landscape and/or making a demonstrably positive contribution to public visual amenity should be prioritised for protection - **High priority**

Principle 3: Open spaces playing a demonstrable nature conservation, geological or heritage function or forming an integral part of a coherent green chain should be considered for protection – **Medium priority**

- Reigate and Banstead Borough Council's Green Infrastructure Strategy sets out the importance of green infrastructure within the Borough and how this will influence plan-making and the determination of planning applications. As defined in the NPPF, green infrastructure is, 'a network of multi-functional greenspace, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities'. Urban open land is classified as green infrastructure within this strategy.
- Reigate and Banstead development Management Plan (Regulation 19) Reigate & Banstead Open Space, Sport & Recreation Assessment (2017 update) updates the 2011 Reigate & Banstead Open Space, Sport and Recreation Assessment which was undertaken in line with the PPG17 Planning for Open Space, Sport & Recreation Assessment and the PPG17 Companion Guide (both now withdrawn). The PPG17 Companion Guide looked to 'encompass all existing open spaces, sport and recreation facilities within the local authority area irrespective of ownership and the extent of public access'. This is reinforced in the 2017 update, which acknowledges that open space does not have to be accessible to have value; 'even without public access, people enjoy having open spaces near to them.'
- As stated above, the highest priority for designating this area of land as Urban Open Space has been given according to its contribution to 'forming an integral part of local character, townscape and landscape and/or making a demonstrably positive contribution to public visual amenity'. The visual amenity provided by this site is that of a green backdrop, as provided by the largely tree-lined boundaries. Given the height and density of the trees and the proximity to which the site can be viewed, there are limited public viewpoints where a sense of the site's openness is apparent and can be appreciated. Whilst there will be some impact on these views from The Council offices and The Belvederes, the school building itself is proposed to be located along the western boundary, the least open area of the site, thereby minimising impact on the 'openness' of the site in terms of built form.

- The proposed development will result in a loss of some trees within the site itself and to the boundaries of the Belvederes, Hornbeam Road and residential properties off Angel Place. The impact of this will be a loss of visual amenity provided by the existing tree cover. However, apart from a relatively short section of proposed tree removal to facilitate the new vehicular access, the longer tree-lined boundary of Cockshot Hill to the west is largely retained, thereby continuing to provide some screening to the proposed development from the road due to the height and density of the trees. Views towards the proposed development from residential properties along Holly Road to the east of the site will continue to be screened by a band of existing trees outside of the application boundary. On the basis of the above statements, whilst it is acknowledged that there will be a visual impact of the development, this will primarily impact private residential properties to the south of the site. It is not considered that the loss of openness resulting from the development would have a significantly adverse effect on the local character or visual amenity from publicly accessible viewpoints. This is in part due to the relatively secluded nature of the site currently, and the fact that the proposals largely retain existing trees and vegetation to the boundaries that screen views into the site from the surrounding roads. Citing a number of previous appeal decisions, Reigate and Banstead's Urban Open Space Assessment and Review acknowledges that, *'there is recognition that lesser weight ought to be afforded to Urban Open Land which provides limited public amenity, either visually or functionally, and that its release should not be unduly stymied'*
- With regard to the impact of the proposals on the ecological value of the site; firstly, as determined by the Urban Open Space Assessment and Review, the 'Canon UK southern field' site has not been designated primarily for its ecological value. Secondly, as part of the planning application, a Preliminary Ecological Assessment has been carried out which has determined that there is not expected to be a significant loss of ecological value within the site as a result of the proposed development.
- Beyond the circumstances set out above, Policy OSR1 states that it must also be shown that a development proposed on a designated Urban Open Space meets at least one of the following criteria: **a.** There is clear evidence to demonstrate that the site is surplus to requirements and does not make a significant contribution to the recreational, community, ecological or amenity value of the area **b.** Provision is made for appropriate and suitably located replacement open space of the same type and of at least equivalent quality and/or quantity. Replacement open spaces should be located as close to the lost open space as possible **c.** The proposal is for alternative sports and recreational provision which clearly outweighs the loss of the open space; or **d.** The proposal is for the expansion of an existing school, the need for which clearly outweighs the loss of the urban open space. Points '**a**' and '**d**' are most relevant to this assessment as considered below.
- In respect of point **a** the site's current function serves as the grounds for SCC's headquarters, associated car parking and landscaping. The site was not open to the public under its previous ownership by Canon UK, and in its current ownership does not obviously promote any formal public access, neither is there evidence of informal or unregulated use. Secure, fenced boundaries surround the site with a single access point through the formal gated vehicle and pedestrian entrance to SCC's offices. Whilst there is no specific signage that marks the site as private property, it equally does not

obviously function as a public open space and the site is not listed as being formally open to the public under its local designation as a 'Historic Park and Gardens of Special Borough Interest'. The dense vegetation and treed boundaries largely obstruct visibility into the site; therefore, it is not obviously accessible or apparent as a place which would be publicly accessible for recreational purposes. Furthermore, the gated entrance is clearly signed as SCC and does not suggest that would be any reason to enter site the without the specific purpose of visiting the Council offices. The site provides open space for the enjoyment of the staff or visitors to the Council offices, however, it does not serve as an everyday recreational facility or amenity space for the general public. Therefore, any loss of open space as a result of the development cannot be deemed as creating a loss of publicly accessible space that has recreational, community or amenity value to the local area. In terms of the provision of publicly accessible open space within the borough, according to Reigate and Banstead's Open Space, Sport and Recreation Assessment (2017 update), there is currently no deficiency of accessible parks and gardens within Reigate 'Central Area', which encompasses South Park and Woodhatch ward where the site is located. Furthermore, there is not expected to be a deficiency in 2027 based on the forecast within the assessment.

- In respect of **b** There is an urgent need to relocate Reigate Priory Junior School in order to provide facilities that meet the standards set out by the Department of Education. Detailed justification for the school's relocation and site selection is set out in the submitted Planning Statement, which highlights that the current school is not fit for purpose and does not meet the Schools' Premises Regulations due to unsatisfactory safeguarding arrangements within the current site, which includes a public right of way. A number of alternative sites were considered for the proposed relocation, based on specific criteria, of which, Woodhatch Place was the only site deemed deliverable within the required timeframes. The National Planning Policy Framework places importance on the provision of school places, Paragraph 95 stating: *'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local 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: a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'* The expansion of an existing school is set out by Policy OSR1 as one of the exceptional circumstances in which development may be permitted, where *'the need for which clearly outweighs the loss of the urban open space'*. Whilst the site is afforded protection as a designated Urban Open Space, it provides limited public amenity, either visually or functionally, and its 'openness' is not perceptible from many viewpoints outside of the site. Coupled with the demonstrable need to relocate Reigate Priory Junior School as set out in the Planning Statement, it is considered that the need for the development would outweigh the loss of the open space on this site.

168 Reigate and Banstead Borough Council has raised objection to this proposal on grounds of adverse impact on open space and visual amenity. The officers report on the consultation states the following:

The site is within and would result in the partial loss of designated Urban Open Space, being located within the grounds of the grounds of Woodhatch Place, the former Canon campus and new Surrey County Council campus. The site while screened by landscaping and railings along the length of Cockshot Hill, remains open in terms of its character and appearance and contributes greatly to the verdant townscape, specifically from the Southern approach to the town. The application is supported by an urban open space assessment which considers a number of alternative sites for relocation of the school, all of which are dismissed. It is agreed that, bar the retention of the existing Priory site for continued school use, the other sites can be fairly discounted. As stated above however, it is disputed that the existing site cannot be adapted and extended to enable its continued school use. Policy OSR1 of the Reigate and Banstead Local Plan Development Management Plan states that any other development which would result in the full or partial loss of designated Urban Open Space will only be permitted in exceptional circumstances where the loss of openness resulting from the proposed development would not have an adverse effect on local character, visual amenity or ecological value. Where such circumstances are permitted the policy requires either that clear evidence to demonstrate that

- the site is surplus to requirements and does not make a significant contribution to the recreational, community, ecological or amenity value of the area*
- Provision is made for appropriate and suitably located replacement open space of the same type and of at least equivalent quality and/or quantity. Replacement open spaces should be located as close to the lost open space as possible*
- The proposal is for the expansion of an existing school, the need for which clearly outweighs the loss of the urban open space*

The application suggests that, as a relocation of an existing school, the third bullet could be applied although this is disputed. This is intended to be applied to existing school sites already situated within urban open space, seeking to extend rather than cases where a school is to be re-sited into urban open space. The site is not considered surplus to requirements and appropriate open space has not been provided. Finally, the proposal is seeking to relocate an existing school and the Borough Planning Authority consider that there is a good opportunity to extended, upgraded and retain the current Priory school at its existing site. As no replacement provision of open space is proposed, the proposal would thereby appear to represent a departure from Policy OSR1 of the Development Management Plan.

- 169 Officers have considered the case made by the applicants and the comments received from the Borough Council and other interested parties on the proposal in respect of the loss of Urban Open Space. Whilst officers can understand the stance taken by Reigate and Banstead Borough Council that the exception in Policy OSR1 relating to the need to expand an existing school does not apply directly *in this case*, as the school is not currently on or adjacent to Urban Open Space, officers consider that the general comment made in the accompanying narrative to the policy, namely *It is proposed that the Council takes a proactive, positive and collaborative approach to meeting the requirements of local schools: this reflects the importance which national policy places on the potential need to expand and alter schools* does still lend significant weight in favour of granting planning permission in this case.

- 170 Officers have concluded in each of the relevant sections of this report above, that the loss of *openness* resulting from the proposed development would have some effect on local character, visual amenity, and ecological value but this is not considered to be significant. The open nature of the application site is not readily apparent from public vantage points and offers little visual amenity. The visual amenity from residential gardens of dwellings adjacent to the site is acknowledged but is considered to carry significantly less weight than if it had been from public vantage points. The ecological value of the site and the impact of the development on these have been considered in the previous section and again are not considered to be significant.
- 171 Officers agree with the applicant that as evidenced in Reigate and Banstead's Open Space, Sport and Recreation Assessment (2017 update), there is currently no deficiency of accessible parks and gardens within the Reigate area. The extract from the Development Management Proposals map included below indicates the application site (shaded purple) and the number of surrounding open spaces in this area. As well as areas of Designated Urban Open Space (shaded dark green on the map) there is a significant amount of publicly accessible land nearby including Priory Park to the northwest and Earlswood and Redhill Commons to the south east and east, all of which are highly visible and accessible to the public and located within the Green Belt (as well as subject to other restrictive policy designations) therefore afforded a significant degree of protection from future development.



- 172 Reigate and Banstead Borough Council has not put forward any comment or evidence that the loss of the application site will give rise to any deficiency of open space in the area and officers consider that the application can be considered as an exception having regard to **criteria a** of Policy OSR1 as put forward by the applicant.

- 173 In conclusion officers consider that in this case exceptional circumstances exist comprising the educational need for a new local site for Reigate Priory Junior School and national and local plan policies give significant weight to such need. Officers consider that the loss of the application site (and partial loss of an area designated as Urban Open Space) for the proposed development would not have an unacceptable impact on local character, visual amenity or ecological value subject to mitigation measures being implemented. Furthermore officers consider that the site can be considered to be surplus to requirements having regard to other open land in this part of the Borough and the fact that it does not make a significant contribution to the recreational or community value of the area. Officers therefore consider that the proposal can be considered favourably against development plan policy in this regard.

IMPACT ON RESIDENTIAL AMENITY

Reigate and Banstead Local Plan Core Strategy (2014)

Policy CS10 – Sustainable Development

Reigate and Banstead Local Plan Development Management Plan (2019)

Policy DES1 – Design of New Development

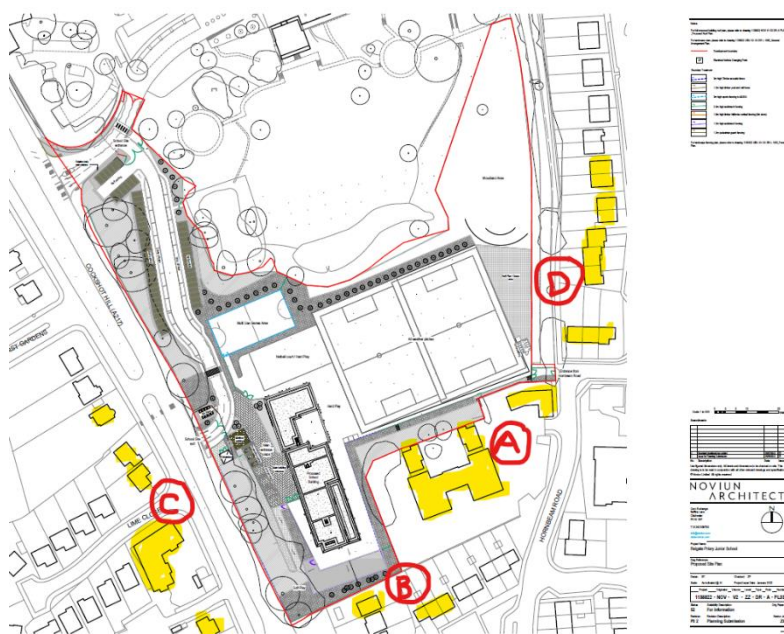
Policy DES9 – Pollution and Contaminated Land

- 173 Paragraph 185 of the NPPF (2021) states that planning policies and 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 impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life
 - c) Limit the impact of light pollution from artificial light on local amenity
- 174 Reigate and Banstead Local Plan Core Strategy Policy CS10 states that development will be designed to minimise pollution including air, noise and light.
- 175 Reigate and Banstead Local Plan Development Management Plan Policy DES1 of states, inter alia, that new development should ‘have due regard to the layout density, plot sizes, building siting, scale, massing, height and roofscapes of the surrounding area, the relationship to neighbouring buildings, and important views into and out of the site’ and ‘provide an appropriate environment for future occupants whilst not adversely impacting upon the amenity of occupants of existing nearby buildings, including by way of overbearing, obtrusiveness, overshadowing, overlooking and loss of privacy’.
- 176 Development Management Plan Policy DES9 states that for all development across the Borough development will only be permitted where it can be demonstrated that (on its own and cumulatively) it will not result in a significant adverse or unacceptable impact on the natural or built environment; amenity; or health and safety due to fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution. Where there would be potential adverse effects from pollution

and adequate mitigation cannot be provided, development will not normally be permitted.

General relationship of proposed development with nearby residential dwellings

- 177 The drawing below shows the proposed development with the adjacent residential dwellings in close proximity to the building and playing pitches highlighted in yellow to indicate context. Officers have carefully considered the impact of the proposal on the residential amenity of these dwellings, as well as the wider community, in the following sections of the report.



Assessment of Impact on existing residential dwellings by virtue of loss of outlook, overshadowing and overlooking

- 178 Officers have considered the following impacts on residential amenity to those dwellings surrounding the application site:
- Outlook: ensuring that the close proximity of another building (or other works/activities) does not adversely affect accommodation by diminishing the visual enjoyment of a dwellings immediate setting.
 - Privacy: the protection of habitable rooms and intimate areas of private outdoor amenity from being directly overlooked.
- 179 The potential for loss of outlook, overshadowing or overlooking will arise from the proposed school building itself and use of the playing fields and footpath access into the site. This impact will potentially impact those dwellings directly adjacent to the school building and playing fields which comprise The Belvederes (apartments and 2 semi-detached houses – A on the plan above), and to a lesser degree properties in Hornbeam Road and Holly Road to the east (D on the plan above).

Impact on occupiers of The Belvederes (A on the drawing above and detailed further on the drawing and photograph below)



- 180 The Belvederes is a predominantly two storey building of apartments with main windows directly facing the site of the proposed new school and all weather playing field. There are also two semi-detached dwellings (1 and 2 The Belvederes) to the east of the apartment block building close to the proposed footpath access to the school in the south eastern corner of the site (both buildings shaded yellow on the plan above). The Belvederes site is located on lower ground than the application site which will exaggerate any impact arising. There is a distance of 17m from the main western elevation of The Belvederes and the edge of the school site and a total of over 30m between the two buildings themselves as shown on the drawing below. There are primary windows to apartments within the Belvederes facing the site of the proposed school (western and northern elevations). The application site boundary is very close to the northern elevation of The Belvederes apartments and there is a distance of approximately 10m from the closest point of the Belvederes apartment block to the proposed 2.4m high weldmesh fence along the southern boundary of the site with the artificial playing fields just north of this fence. There are some primary windows to apartments at each end of the block close to the boundary of the site facing north but the majority (in the centre) are set a considerable way back from the boundary given the U-configuration of the building, again as shown on the plan above. The semi-detached properties known as 1 and 2 The Belvederes to the to the east of the apartment block lie much closer to the proposed 2.4m high fence, proposed pedestrian access into the site and the proposed playing fields (the north elevation of these dwellings being at a distance of some 4m from the proposed fence with patios and primary windows fronting that elevation).

Impact on apartments within The Belvederes with primary windows facing west towards the school building

7

- 181 The school building has been designed with the second floor set in at its southeastern end to increase the distance of proposed second floor from the boundary of the site with The Belvederes in order to minimise the overall impact of the building massing. There would also be a 3m high close board acoustic fence located within the school site along this part of the boundary.



- 182 The western garden area to The Belvederes contains a number of trees and the applicant is proposing to plant a buffer of further trees adjacent to those along the application site boundaries. Whilst it is acknowledged that the proposed new school building will clearly be visible from the windows and garden areas of apartments facing west within The Belvederes, given the distances maintained between the two buildings, together with the degree of natural screening, both existing and proposed, officers conclude that the proposal will not give rise to an unacceptable impact on the residents of The Belvedere by virtue of direct overlooking or loss of outlook.



Impact on apartments within The Belvederes with gardens and primary windows facing north towards the school playing fields

- 183 There will be a distance of some 10 from the nearest apartments within the main block and the proposed 2.4m weldmesh fencing with the internal pedestrian path (leading from the access in Hornbeam Road) running alongside it with the proposed playing fields directly to the north. The application site is also set at a higher level than the Belvederes as stated earlier. Officers consider that the minimum distance maintained is sufficient to prevent unacceptable overlooking or loss of outlook to those windows though clearly the aspect from the windows will change from an *unencumbered* view as at present. Additional landscaping is also indicated outside of the fence and the details of this will be required by condition. This will soften the impact of the fence and the use of the playing fields to the north of the fence. The semi-detached dwellings known as 1 and 2 The Belvederes are considerably closer to the proposed boundary fence with patio areas and windows facing on to the proposed playing fields and pedestrian access into the site. Officers consider that the proposal as submitted does give rise to potential for overlooking of the principal windows and private garden areas of these two dwellings by virtue of their location in proximity to the shared boundary, the proposed access to the site, the present lack of screening proposed and the difference in site levels. Officers consider that this impact could be satisfactorily addressed with more appropriate boundary treatment (to be agreed in consultation with the occupiers of those dwellings) and which will be required to be installed prior to the occupation of the site. Appropriate conditions are recommended in this regard.

Impact on dwellings to the east (Hornbeam Road and Holly Road (D on the drawing above)

- 184 In view of distances and (and in respect of the dwellings in Holly Road the screening) to the existing dwellings to the east of the site, officers are satisfied that the proposal will not give rise to any unacceptable loss of residential amenity on those dwellings by virtue of overlooking or loss of outlook.

Impact on dwellings to the south and east (B and C on the drawing above)

- 185 In view of distances and existing screening to the existing dwellings to the west of the site on the opposite side of Cockshot Hill and to Angel Place to the south, officers are satisfied that the proposal will not give rise to any unacceptable loss of residential amenity on those dwellings by virtue of overlooking or loss of outlook.

Conclusion on impact in respect of loss of outlook, overshadowing and overlooking

- 186 Officers conclude that subject to appropriate conditions particularly in relation to screening of number 1 and 2 The Belvederes and also to secure suitable additional landscaping the proposal will not have any unacceptable impact on residential amenity arising by virtue of loss of outlook and overlooking and is acceptable in this regard.

Assessment of Impact on existing residential dwellings by virtue of noise disturbance

- 187 The siting of schools in close proximity to residential dwellings is generally considered to be acceptable in planning terms with the nature of the uses being compatible with each other within both rural and urban settings. In pre-application

discussion Officers have however sought to ensure that the proposal does not give rise to undue loss of residential amenity by virtue of unacceptable sources of noise arising, and these have been addressed by the applicant in the submission and will be further controlled by appropriate conditions on the planning consent. A summary of the main sources of noise disturbance and the officers assessment of these is set out below:

Noise arising from the use of the artificial playing fields and pedestrian access to the site from the east

- 188 The proposal includes the provision of all-weather grass playing fields which will be located directly to the north of the dwellings known as The Belvederes. The applicant states that these could be marked to provide sport pitches or just used for general play. The all-weather playing fields are not proposed to be illuminated and the applicant states that therefore they would only be used as grass playing fields in hours of daylight. No specific community use of the facilities are proposed in this application.
- 189 The applicant submitted Acoustic and External Noise Survey reports with the application with the results of baseline noise surveys undertaken across the site including directly adjacent to The Belvederes. The applicants have concluded that predicted noise levels will be below measured levels, but that the nature of the sound which would arise from these areas is of a *different character* to the prevailing noise climate and may therefore, still be audible at the nearest noise sensitive receptors, being neighbouring residential dwellings.
- 190 Surrey County Council's Noise consultants recommended that further information was requested from the Applicant in this regard before the planning application was determined but the applicant requested that the matter could be controlled by appropriate conditions should planning permission be granted and officers agree this is appropriate having regard to the following paragraphs.
- 191 Any noise emitted from this use of an artificial grassed pitch is defined as *community noise* having regard to World Health Organisation (WHO) 'Guidelines for Community Noise' published in 1999. In respect of community noise for noise levels internally and externally to dwellings it states: *To enable casual conversation indoors during daytime, the sound level of interfering noise should not exceed 35 dB LAeq*. Based on a 15 decibel sound reduction of a partially open window, the noise level outside a residential property during the daytime about 1 metre from façades of living spaces should not exceed 50 dB LAeq. The WHO document also provides guidance for outdoor living areas. It states that to avoid 'moderate annoyance' during the daytime and evening the noise level should not exceed 50 dB LAeq(T).
- 192 World Health Organisation guidelines for residential development are typically calculated over a 16 hour daytime period. For an artificial grass pitch, a 16 hour assessment period may not truly reflect the noise impact as it takes into account times of use and non-use. It is suggested an appropriate assessment time period is for one hour, LAeq(1 hour) as this is typically the time period for a community sports session on an Artificial Grassed Pitch. This WHO criteria was reviewed in a report by the National Physical Laboratory (reference CMAM16) which states: exceedance of the WHO guideline values does not necessarily imply significant noise impact and

indeed, it may be that significant impacts do not occur until much higher levels of noise exposure are reached “Therefore, it is not necessarily the case that where these levels are exceeded, the noise will adversely affect nearby residential properties.

- 193 Typical noise levels from artificial grass pitches can be found in Sports England document Artificial Grass Pitch (AGP) Acoustics - Planning Implications August 2015 That document states that a typical free-field noise level of 58 dB LAeq(1 hour) 4 at a distance of 10 metres (m) from the sideline halfway marking has been determined as representative for noise from an AGP. However this includes usage of the pitch by both adults and children. The document advises that the noise can be increased at greater heights.
- 194 Officers consider that having regard to the above and the proximity of neighbouring dwellings to the proposed pitch the proposal will give rise to a degree of noise disturbance to neighbouring residents particularly to the occupiers of 1 and 2 The Belvederes (and representations have been received from the occupiers in this regard), but also to the other apartments with principal windows facing north in the main building. Officers consider this would not be significant to constitute grounds to refuse the application as the impact can be limited and mitigated to render it acceptable by attaching conditions to the planning consent (which is an approach agreed by the applicants). Officers therefore recommend the following conditions in this regard:
- A condition to restrict the use of the playing field to solely in connection with the school.
 - Although the proposal does not include lighting a condition restricting hours of use of the playing field is considered appropriate
 - A further condition requiring the applicant to undertake a detailed noise survey at residential dwellings which are adjacent to the southern boundary of the site and subject to the outcome of this to erect an acoustic fence along the whole, or part of the southern boundary of the site, following consultation with the occupiers of those properties affected and prior to the use of the artificial grass pitch playing fields (details of all of this to be submitted to the County Planning Authority).
- 195 Officers have considered representations from residents regarding disturbance from the use of the proposed pedestrian access from Hornbeam Road which runs along the southern boundary of the site to the school building. Given this is to provide access for pupils at the school and will only be in use during peak school arrival and departure times officers do not consider that the use of this could be considered to have a significant impact on the occupiers of the adjacent dwellings albeit it will be different to what they enjoy at present, subject to appropriate boundary screening which will be secured in accordance with the conditions suggested in the preceding paragraph. Officers also recommend a condition is attached which requires access to this path be limited to arrival and departure times and the gates to be secured outside of peak school hours.

Noise arising from plant

- 196 Indicative information has been provided indicating that any plant associated with the proposed development can be designed to ensure that it does not have an adverse

noise impact on neighbouring noise sensitive receptors. Officers consider that this can be controlled by the use of standard planning conditions requiring further details of proposed plant and limiting noise generated by plant to a certain level.

Construction Noise

- 197 No detailed information has been provided with this application. However, as confirmed by the County Council's noise consultants this aspect is not considered a key determining factor in granting consent as any impact is temporary and can be mitigated to a certain degree by the use of standard planning conditions (such as those limiting hours of construction) as well as controls under other legislation administered by District/Boroughs Environmental Health Officers.

Traffic Noise

- 198 Officers consider that the location of the main drop off area to the north of the proposed school building reduces the potential impact that this aspect will have in respect of nearest sensitive noise receptors (residential dwellings to the south of the site in The Belvederes and Angel Place). Some pupils may be dropped off at the proposed pedestrian access to the east in Hornbeam Road and this regard will be accommodated on the public highway. The roads surrounding the site will also be used for drop off of pupils (also considered in the next paragraph). In all instances and as is the case with most schools the noise and disturbance arising from school traffic is acknowledged but it occurs at very short periods during weekdays and is confined to very short period of time (drop off and pick up times only). Officers are satisfied that this source of noise will not give rise to any undue loss of residential amenity to the residents
- 199 In respect of the use of surrounding residential roads for drop off the applicants have submitted surveys which indicate that a sufficient amount of unrestricted on-street car parking spaces are available to accommodate the anticipated number of cars which will need to be accommodated (on a worst case scenario basis) at peak times. Transportation Development Planning are also satisfied that sufficient space is available, and this will not give rise to capacity or highways safety issues. As stated above this is a situation which occurs at most schools and which transportation and planning officers seek to minimise by requiring schools to implement Travel Plans which actively encourage access to school by alternative modes of transport. An outline Travel Plan has been submitted with the application and this will need to be modified and developed by the school and monitored and updated (controlled by planning condition). Whilst this will assist towards minimising access to the school by car that mode of transport will can be the only or favoured option for many reasons. The impact of this traffic/parking on residents around the site will only occur for short periods during weekdays and in this regard is not considered to be significant such that it renders the proposal unacceptable in this regard.

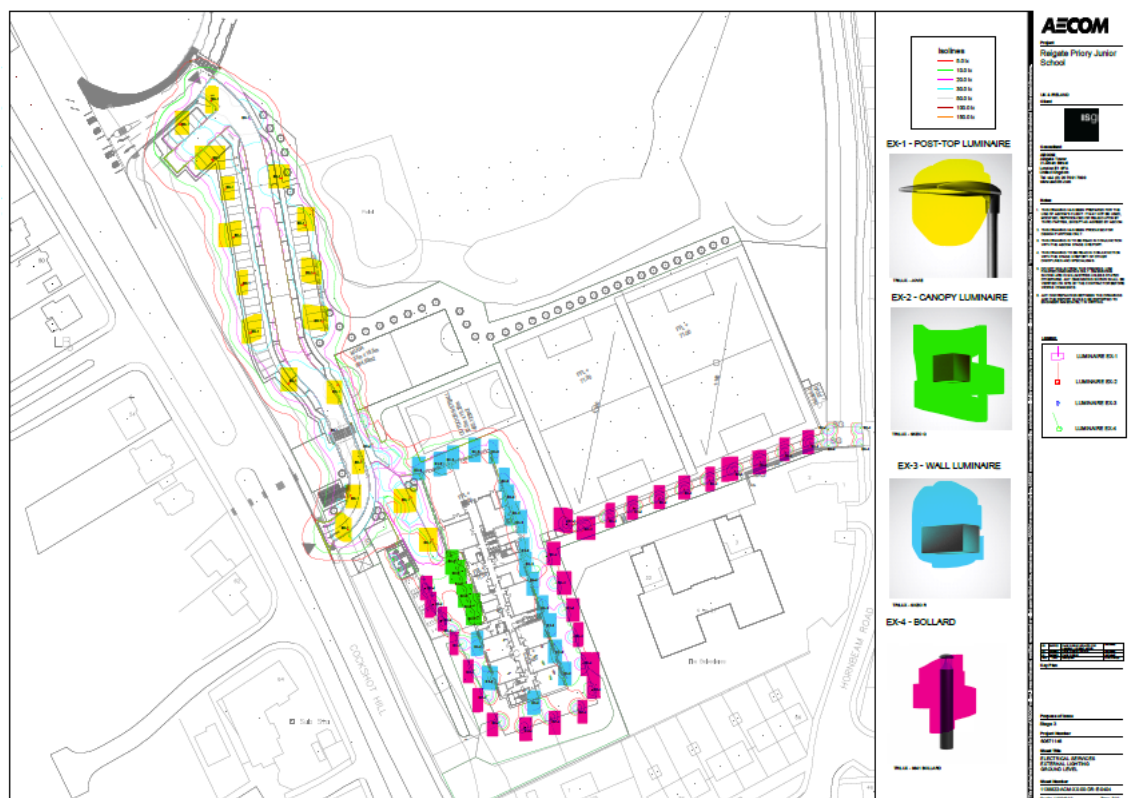
Conclusion on impact in respect of noise disturbance

- 200 Officers conclude that subject to appropriate conditions the proposal will not have any unacceptable impact on residential amenity arising by virtue of noise disturbance and is acceptable in this regard.

Assessment of Impact on existing residential dwellings by virtue of light pollution

201 The applicants have submitted details of the proposed lighting around the site on four drawings together with a lighting strategy document which confirms that the lighting is confined to outdoor walkways, carparks, and the site entrances and no lighting is proposed for the external play or games areas. A summary of the proposed lighting is shown on the drawing extract below and is as follows:

- Several column lights on top of 6m high posts will be used to light the main access to the site and car parking area and drop off zone to the north of the proposed school building
- The school building itself will have wall and canopy mounted downlighting fixtures around the whole of its exterior at key entrance points
- There would be low level bollard lighting at other areas throughout the site including along pathways to the south of the all weather play area adjacent to the boundary with The Belvederes



202 Surrey County Council's Lighting advisors advise that the applicant has submitted all the information which we would expect to see to make an assessment of the proposed lighting scheme. The scheme is designed in accordance with the local environmental zone and off-site light spillage and nuisance glare has been avoided by the appropriate choice of luminaire and setting out. The lux plot demonstrates the lighting scheme to the car park, access road, building perimeter and footpath complies with the design criteria utilising the "dark sky" fittings detailed in the assessment report. The plots also show that illumination to bat roosting areas listed in the ecology report has been avoided. Officer do not consider the proposed lighting

strategy will have an adverse impact on the residential amenity of neighbouring residential dwellings. Subject to conditions limiting the hours of illumination and restricting the installation of any further lights being installed without prior permission the proposal is considered to be acceptable in this regard.

Conclusion on impact in respect of lighting impact

- 203 Officers consider that the proposed lighting scheme is acceptable such that it will not give rise to any loss of residential amenity to adjacent residential dwellings by virtue of light pollution and glare, subject to appropriate conditions.

Assessment of impact in respect of Air Quality/Dust

- 204 The applicant submitted an Air Quality Assessment with the application which was supplemented by an additional document following comments from consultations received (document entitled Air Quality Assessment Update 03 01 2023). The Air Quality Assessment document provides the following:

- A review of background air quality within the Borough and in particular in the vicinity of the site;
- A review of relevant legislation and air quality planning policy
- Three months' NO₂ diffusion tube monitoring survey (undertaken at eight locations)
- Review of sensitive locations in the vicinity of the site and the selection of potentially sensitive receptors for inclusion in the assessment
- Qualitative assessment of demolition and construction dust during the construction phase
- Quantitative assessment of potential impacts as a result of changes in road traffic emissions associated with the opening of the Proposed Development using the ADMS-Roads dispersion model to predict changes in NO₂, PM₁₀ and PM_{2.5} concentrations at existing sensitive receptors, as these pollutants are most likely to exceed UK Air Quality Strategy (AQS) objectives
- An assessment of the suitability of the site for its planned use in terms of air quality

- 205 The document concludes that the proposed development has the potential to result in air quality effects both during construction and once it is occupied. The potential impacts of the following emission sources have been assessed, as these are considered to have the potential to give rise to the greatest effects:

Construction Phase - fugitive dust and emissions from construction plant, vehicles and related activities; and

Operational Phase - Road traffic emissions generated by the operational phase of the Proposed Development.

- 206 In respect of the two aspects the applicants document reaches the following conclusions:

Construction Phase

- 207 The results of the applicants construction phase impact assessment indicate that, in the absence of mitigation, construction phase impacts associated with the Proposed

Development, can be described as *medium risk* to dust soiling and human health. There are a range of mitigation measures then suggested (around site management, suppression and monitoring) and it is concluded that these, if effectively implemented, could reduce the impact to an *insignificant* level.

- 208 The applicants Air Quality Assessment proposes that appropriate mitigation measures should be implemented through a Dust Management Plan or a Construction Environmental Management Plan. The report notes that local air quality is considered unlikely to be significantly affected during the construction phase of the proposed development as a result of *vehicle emissions*. Any impacts would be considered short term and temporary in nature and therefore not significant.

Operational Phase

- 209 The results of the applicants operational phase impact assessment concludes that the operational traffic impacts of the proposed development on local air quality are *not significant*. As such, no mitigation measures are required, in terms of air quality, during the operational phase of the Proposed Development.
- 210 The Council's Air Quality Consultant (RPS) was consulted on the proposal and advised the following:

Construction Phase

- 211 The applicants Air Quality Assessment erroneously uses a *medium* magnitude for construction works to determine the risk whereas a *small* demolition magnitude should be used. Using a small demolition magnitude, the risk of dust soiling is **low** for demolition works, rather than **medium**. However the conclusion of a medium risk overall is likely to be a worse case. The applicant has set out the IAQM recommended mitigation measures for a medium risk site in which would be formalised in a Dust Management Plan or a Construction Environmental Management Plan.

Operational Phase

- 212 The Council's Air Quality Consultant RPS corrected two errors in the applicants original air quality assessment report following representations received from interested parties. In relation to the second error and the disparity between the measured and modelled concentrations at certain locations, the applicant has undertaken a sensitivity test. The results of this sensitivity analysis have not been provided (officers have requested these from the applicant for completeness but they had not been received at the time the report was completed – the Committee will be updated if received) however RPS confirm that, if this is the case then it would indicate that the annual-mean NO₂ objective is likely to be met. RPS previously advised that the annual-mean Air Quality Strategy NO₂ objective of 40 µg.m⁻³ does not apply on pavements. Only the short-term Air Quality Strategy objective would apply on the pavement. Research indicates that the short-term limit value and objective for NO₂ is unlikely to be exceeded at a roadside location where the annual-mean NO₂ concentration is less than 60 µg.m⁻³. That being the case, the short-term Air Quality Strategy objective is also unlikely to be exceeded.

Representation received on Air Quality

- 213 Holmesdale Priory Parents Group (HPPG) sent in a representation to this application which raised concerns relating to the concentration of nitrogen dioxide (NO₂) due to air pollution along the A217 Cockshot Hill. The route is the east side pavement (the only pavement) and road to and from the proposed school location. The HPPG document states that independent analysis of nitrogen dioxide (NO₂) monitoring conducted along this route confirms a breach of the “Air Quality Standards Regulations 2010” that state that the annual mean concentration of NO₂ must not exceed 40 µg/m³. Over a period of three months; July, August and September 2022, the NO₂ levels were recorded as 43 in July, 57 in August and 53 in September. It notes that NO₂ levels are likely to be higher in other months throughout the year. HPPG consider that on the basis that the proposed planning application significantly increases trip generation and further increases these already unacceptable levels, the planning application must be rejected to avoid the further increases in NO₂ that the proposal will generate and associated impacts on children’s health.
- 214 Given the detailed content of this representation the views of both the Council’s Air Quality Consultant (RPS) and the applicant were sought. In respect of the *methodology* used by HPPG, RPS notes that the pollution monitoring tubes used to collect data to inform their comments were sited on lampposts adjacent to the A217 highway. They point out that Defra’s Local Air Quality Management Technical Guidance (TG22) states that the objectives should apply at “All locations where members of the public might be regularly exposed. Building façades of residential properties, schools, hospitals, care homes etc.” and should generally not apply at “*Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term*”. The Air Quality Consultant concludes that the annual-mean Air Quality Strategy objective of 40 µg.m⁻³ therefore does not apply on in the situation referred to by this objector – that is on pavements.
- 215 RPS goes on to advise that in addition to an annual-mean concentration, the Air Quality Regulations and Air Quality Strategy sets out a short-term limit value/objective for the hourly-mean NO₂ concentration to not be above 200 µg.m⁻³ on more than 18 occasions. Defra’s TG22 considers that this is the appropriate objective for “outdoor locations where members of the public might reasonably expect to spend one hour or longer”. It is not possible to measure hourly-mean NO₂ concentrations using passive diffusion tubes; however, research undertaken in support of TG22 has indicated that the hourly-mean limit value and objective for NO₂ is unlikely to be exceeded at a roadside location where the annual-mean NO₂ concentration is less than 60 µg.m⁻³.
- 216 RPS concludes on the methodology that before making a comparison of the measurements in the HPPG document with an annual-mean concentration of 60 µg.m⁻³, the concentrations would need to be annualised and adjusted for bias. Neither of these processes has been carried out in relation to the HPP data so it is difficult to comment on whether the measurements indicate that the equivalent annual-mean concentration is above 60 µg.m⁻³. The view, however, is that this is unlikely given that:
- The nearest UK urban background site operated by Defra is at Preston Park in Brighton (32 km from the site). A review of available data monitoring data at

Preston Park indicates that the annual-mean NO₂ concentration in 2022 was 115% of the average of measurements from 5 July 2022 to 29 September 2022.

- The bias adjustment may increase or decrease the measurement concentration. The latest Annual Status Report available on Reigate and Banstead Council's website (for 2020) indicates that the bias adjustment decreased the measured concentration by approximately 10% in 2017, 2018 and 2019.

- 217 All things being equal, RPS concludes that the measurements provided by the HPPG suggest that the relevant air quality short-term objective would be met on the pavement of Cockshot Hill.
- 218 The HPPG representation did point out a number of inadequacies/discrepancies in the applicants Air Quality Assessment, and the applicant was asked to address these along with others identified by RPS. This gave rise to the applicant submitting an update to the Air Quality Assessment clarifying the inadequacies and addressing discrepancies. In respect of the HPPG letter that update document states that the Council's Air Quality Consultants (RPS) response letter provides a reasonable, independent response to the HPPG objection letter, and the applicants support RPS's review. Whilst HPPG's concerns about exposure of children to pollutants on their walk to school is understandable, RPS makes the point that the annual mean objective does not apply to this activity and that the short term (hourly) objective is the objective that is relevant. It is highly unlikely that the HPPG diffusion tube results would exceed 60 ug/m³ after being annualised and bias adjusted. The applicants Air Quality Advisors add that HPPG has not considered the children's current exposure on the walk to the current location of Reigate Priory Junior School. Reigate Priory Junior School is located much closer to the current Air Quality Management Area where concentrations are confirmed to be above the annual mean objective for NO₂ concentration. In respect of the HPPG claims that the air quality assessment undertaken by AECOM is inadequate, RPS have provided a fair review of the AECOM assessment, and provided four requests for further clarification, which were responded to. The main objection that HPPG raise is that the majority of the monitoring points referenced in the air quality assessment are in the AQMA to the north of the new school site and not relevant to the exposure of the children. RPS state that the purpose of the AECOM diffusion tubes is to measure the concentration at building facades. Neither of these statements are accurate and miss the purpose of the monitoring in the report, which is to verify the results of the dispersion modelling, not to provide exposure information.
- 219 The comments made by the HPPG in this regard have been fully considered in the assessment of this proposal.
- 220 Having regard to the above and based on the fact that the proposal is not giving rise to *completely* new vehicle trip generation officers agree with the applicant and the Council's Air Quality advisor that the operational traffic impacts of the proposed development on local air quality are *not significant*. The projected impact during the construction phase is low but methods of dust management can be included within the amended Construction Environmental Method Statement to be submitted.

DRAINAGE AND FLOOD RISK CONSIDERATIONS

Reigate and Banstead Local Plan Core Strategy 2014

Policy CS10 – Sustainable Development

Reigate and Banstead Local Plan Development Management Plan 2019

Policy CCF2 – Flood Risk

Policy INF1 – Infrastructure

- 221 Paragraph 159 of the National Planning Policy Framework 2021 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.
- 222 Paragraph 167 states that when determining any planning application, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding, where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:
- a) Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location.
 - b) The development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment.
 - c) It incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate.
 - d) Any residual risk can be safely managed.
 - e) Safe access and escape routes are included where appropriate, as part of an agreed emergency plan.
- 223 Footnote 55 states that in Flood Zone 1, an assessment should accompany all proposals involving, inter alia, sites of 1 hectare or more.
- 224 Reigate and Banstead Local Plan Core Strategy Policy CS10 requires development to be located to minimise flood risk, through the application of the Sequential Test and where necessary the Exception Test, taking account of all the sources of flooding including fluvial, surface water, sewer and pluvial flooding, and reservoirs failure, and manage flood risk using SuDS and flood resistant/resilient design features, and where necessary provide flood plain compensation.
- 225 Reigate and Banstead Local Plan Development Management Plan Policy CCF2 states that the development proposals must avoid areas at risk of flooding where possible and prioritise development in areas with the lowest risk of flooding. The Sequential Test shall be undertaken for developments in Flood Zones 2 and 3, except where exempt in accordance with the requirements of the NPPF and Planning Practice Guidance. Development will not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower

probability of flooding. Where necessary the Exception test must also be satisfied in line with national guidance.

- 226 Reigate and Banstead Local Plan Development Management Plan Policy CCF2 goes on to state that the sites within Flood Zone 2 and 3, and sites with critical drainage problems a site-specific Flood Risk Assessment (appropriate to the scale of the development) would be required. Where a Flood Risk Assessment is required, it should:
- a) Take account of the impacts of climate change over the lifetime of the development.
 - b) Demonstrate that the development will be safe for its lifetime taking account of the vulnerability of the proposed use.
 - c) Take account of the advice and recommendations set out in the Council's Strategic Flood Risk Assessment.
- 227 The policy goes on to state that proposals must not increase the existing and future risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding for existing and proposed development.
- 228 Development should reduce surface water run-off rates using Sustainable Drainage systems where necessary, suitable to the scale and type of development. Where Sustainable Drainage Systems are proposed, schemes should include appropriate arrangements for the ongoing maintenance for the lifetime of the development.
- 229 Reigate and Banstead Local Plan Development Management Plan Policy INF1 states that the Council will require timely infrastructure provision to support a particular development and/or to mitigate any negative impacts that would otherwise result from the development. Part (4) of Policy INF1 states that applications which would likely impact on the local utilities network must provide evidence to demonstrate that the impact would not be unacceptable, including about water supply, waste-water treatment capacity, and the risk of sewer flooding.
- 230 The site lies within Flood Zone 1 however in accordance with the requirements of the National Planning Policy Framework the applicant has submitted a Flood Risk Assessment with the application as the site extends to more than 1 hectare. This document
- Reviews Environment Agency flood risk data, topographic data, scheme proposals and available planning policy documents (i.e. Strategic Flood Risk Assessments and Preliminary Flood Risk Assessments)
 - Assesses and interprets available information to identify potential sources of flood risk including fluvial, tidal, groundwater, sewer, surface water and artificial sources
 - Summarises how surface water will be managed from the Proposed Development
- 231 The FRA concludes that:

- The risk from fluvial sources is considered to be very low
- The risk from tidal flooding is considered to be negligible
- The risk of groundwater flooding is considered to be low
- The risk of surface water flooding is considered to be low
- The risk of sewer flooding is considered to be medium
- The risk of flooding from artificial sources is considered to be low
- Surface water from the Proposed Development will be managed through a drainage strategy

232 A Drainage Strategy for the surface water run-off from the proposed development was submitted with the application. The Strategy evolved in accordance with advice set out in Surrey County Council Sustainable Drainage System Design Guidance looking at, in order:

- a. At source reductions and reuse
- b. Infiltration to ground
- c. Attenuated discharge to a surface water body
- d. Discharge to a public surface water sewer
- e. Discharge to a highway drain, or other private drainage system
- f. Discharge to a combined sewer where there are absolutely no other options, and only where agreed in advance with the relevant sewage undertaker.

233 The Drainage Strategy confirmed that sitewide infiltration tests were undertaken on two separate occasions, and both sets of tests concluded that ground conditions on the site are not suitable for infiltration due to poor infiltration rates. The proposal therefore provides for surface water to drain to a new attenuation tank to be provided in the southwest of the site. The attenuation tank will discharge to an existing Thames Water surface water sewer via a controlled outlet, limiting discharges to greenfield runoff rates. The proposed layout also indicates the provision of a green roof within the school structure which will reduce the volume of surface water entering the drainage network, encouraging transpiration and evaporation. In addition several locations are indicated within the site where permeable surfacing can be used to maximise infiltration where feasible.

234 The Lead Local Flooding Authority SuDS & Consenting Team requested additional information on the proposed drainage strategy which the applicant submitted. They have now advised that the proposed drainage strategy is acceptable subject to several conditions which officers agree will be required to be attached to any permission.

235 Having regard to the above officers consider that subject to appropriate conditions the requirements of the Development Plan have been met in this regard.

HIGHWAYS CONSIDERATIONS

Reigate and Banstead Core Strategy 2014

Policy CS10 - Sustainable Development

Policy CS17 – Travel options and sustainability

Reigate and Banstead Local Plan (Development Management Plan) 2019

Policy DES1 – Design of New Development

Policy DES 8 – Construction Management

Policy TAP1 – Access, Parking and Servicing

- 236 Paragraph 110 of the National Planning Policy Framework (2021) states that in assessing specific application 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.
 - d) Any significant impacts from the development on transport (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 237 Paragraphs 111/112 state that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Applications for development should (a) give priority first to pedestrian and cycle movements, facilitating access to high quality public transport; (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; and (d) allow for the efficient delivery of goods and access by service and emergency vehicles. Paragraph 100 of the NPPF (2021) states that planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users.
- 238 Core Strategy Policy CS10 promotes sustainable development and, inter alia, expresses a priority for efficient use of land and development on previously developed land within urban areas and contributing to a reduction in carbon emissions. Policy CS17 requires the provision of travel plans and transport assessments for proposals which are likely to generate significant amounts of movement.
- 239 Local Plan Policy DES 1 requires new development proposals to make adequate provision for access, servicing turning space and parking. Local Plan Policy TAP1 reinforces this and requires that developments provide safe and convenient access for all road users and should not materially exacerbate traffic congestion on the existing highway network. Policy DES 8 states that all developments are to be managed in a safe and considerate manner, this includes where required a Construction Management Statement which addresses how the development impacts will be managed appropriate to the scale and the context of the development. It should seek to minimise disruption and impact to the environment to promote measures to manage traffic and parking impact, highway/pedestrian safety and congestion.
- 240 The applicant submitted the following highways related documents with this application: a Transport Assessment, a School Travel Plan, a Delivery and Servicing Plan, Car Park Management Plan and a Construction Logistic Plan.
- 241 The Transport Assessment firstly summarised the approach taken to the main highways aspects of the proposed development on this site as follows:

- The proposed site will take vehicular access from the existing access into Woodhatch Place
- The application site will provide an on-site car park and drop off area (predominantly for long-stay parking, but also a small level of short-stay parking), which will operate under a one-way system.
- A new site egress will be provided to the south, exiting back onto Cockshot Hill.
- Three points of pedestrian access will be provided, from Cockshot Hill (north and south) and from Hornbeam Road to the rear.

Accessibility to the site by non-car modes is assessed and the following is concluded:

Walking

- 242 The residential areas of Dovers Green, South Park and Meadvale are within a 20-minute walk of the site as well as Reigate Town Centre. As such, this provides the opportunity for future staff and pupils that live locally to walk to the school, as is typically the case for schools. In proximity to the application site, footways are available on the eastern side of Cockshot Hill, with dropped kerbs and tactile paving provided at the junction with Woodhatch Place. Just north of this junction, a pedestrian-controlled signal crossing is available across Cockshot Hill providing access to the western side of the road and the northbound bus stop approximately 35m north of the crossing point. This crossing provides access to the residential area to the west of the site as well as Footpath 22 approximately 70m to the north. Street lighting is provided along Cockshot Hill. Along the length of the A217 towards Reigate there are a series of additional controlled and uncontrolled crossings which provide numerous crossing opportunities.
- 243 In the residential area to the east of the site, footways are generally provided on both sides of the road, including along Hornbeam Road and Holly Road. Dropped kerbs are provided to increase ease of crossing at minor junctions as well as street lighting provided throughout the residential area. There are a number of footpaths in proximity to the site. In addition to Footpath 22 referred to in the previous paragraph Footpath 46 (approximately 275m to the north of the application site) runs along the northern boundary of Woodhatch Place and connects Cockshot Hill and Smoke Lane and Footpath 47 runs along the eastern site boundary between Hornbeam Road and Smoke Lane.
- 244 An audit of footway widths generally across Reigate/in proximity to other schools such as Holmesdale Community Infant School and Reigate Parish Church School. This shows that across the roads surveyed there are relatively varied footway widths, with many locations found to have widths of under 2m. It shows that the footway on the eastern side of Cockshot Hill is relatively wide (1.85m) at the locations measured just to the north of the proposed school site. It is noted that footways in proximity to Woodhatch feel narrower than this as there is vegetation overgrowth on the eastern side of the road which limit the effective width of the footway. This will be addressed as part of the development where existing overgrown vegetation will be cut back to the existing fence line; thus, the approximate measured widths are based on the physical available footway width.

- 245 Near the pedestrian crossing just north of Woodhatch it is noted that the footway reduces to 1.3m at the pinch point, however, to the north of this location footways become much wider and measure between 1.5m-2.8m. The report concludes that footway widths in the vicinity of the application site are proposed to be addressed as part of the package of off-site highway works.

Cycling

- 246 The residential areas of Redhill, Earlswood and Salfords are within a 20-minute cycle of the site providing staff that live within these areas the opportunity to cycle to school. In addition, given the number of railway stations located within a 20-minute cycle of the site, there is the potential for some staff to undertake multimodal journeys to the site. A National Cycle Network (NCN) Link Route is provided to the north of the site from Reigate Town Centre, east to NCN Route 21 providing a connection to key local destinations including Horley and Crawley. There is a shared footway/cycleway along Woodhatch Road and a new cycle route would be provided along Prices Lane to the south of the site with signage indicating the route to Earlswood to the east.as part of the off-site highways works with this application

Bus routes

- 247 The nearest bus stops to the site are located on Cockshot Hill (A217) which are located 200m away (an approximate 2-minute walk) north-west of the site. The stops are served by the 433 to destinations including Oakwoodhill and Redhill. Both stops are provided with a flag-and-pole arrangement and timetable information. Bus stops located to the east of the site on Holly Road provide access to the 422 and 424 bus services. Although not currently accessible from the site, with the provision of the proposed access to the east of the site as part of this application, the stops would be located 150m away (an approximate 2-minute walk). In addition, the 435-bus service is available 400m (an approximate 6-minute walk) south of the site on Woodhatch Road as well as the 430-bus service which is accessible 450m (an approximate 6-minute walk) south of the site on Prices Lane.

National Rail

- 248 The nearest rail station is Reigate Railway Station which is located 2km away (an approximate 24-minute walk) north of the school. The station can also be reached through local bus services, with a journey time of circa 20-minutes. The station is served by Southern and Great Western Railway services, providing frequent services to Redhill, Reading, Tonbridge and Gatwick Airport. There are approximately five services per hour from Reigate Railway Station. Earlswood Railway Station is located 2.3km east of the proposed school site (an approximate 28-minute walk). This station can be reached by local bus services with a journey time of circa 13-23 minutes. The station is served by Southern and Thameslink services, providing frequent services to Gatwick Airport and Bedford. There are approximately four services per hour from Earlswood Railway Station.

Overall consideration of accessibility by means other than car

- 249 The proposed development is predominantly in a residential area located on Cockshot Hill (A217) to the south of Reigate town centre. There is good walking

provision around the school as well as a pedestrian-controlled signal crossing close to the existing Woodhatch Place access. There is good cycling access, with Reigate Railway Station located within both a reasonable walking and cycling distance of the site. The site is less well served by public bus, but reasonably accessible by train for staff/visitors that commute by this mode. It is not typical for children of junior or primary school age to travel by bus and, despite the existing site's central Reigate location, very few pupils at Reigate Priory currently travel by bus, thus the focus is on continuing to facilitate walking/cycling/scooting as a viable alternative to travelling by car.

- 250 The Transport Assessment then reviews the local highway network surrounding the site including considering and/or surveying accident data, on-street parking capacity, existing traffic flows and capacity at key junctions. This concludes that there is a minimum of 165 on street parking spaces available at any given time and all of the road junctions currently operate well within their capacity in the peak periods, with the exception of the Pendleton Road/ Woodhatch Road roundabout and the Cockshot Hill/ Woodhatch Road/ Dovers Green Road/ Prices Lane signalised junction. This latter junction is currently subject to redesign by Surrey County Council to provide more capacity and associated facilities to accommodate non-motorised road users.
- 251 The Transport Assessment then summarises where existing pupils at Reigate Priory School travel from and how the relocation of the school will impact on them:

Figure 5-1: Current Pupil Home Postcode Locations in Proximity to RPJS (Existing Town Centre Site)

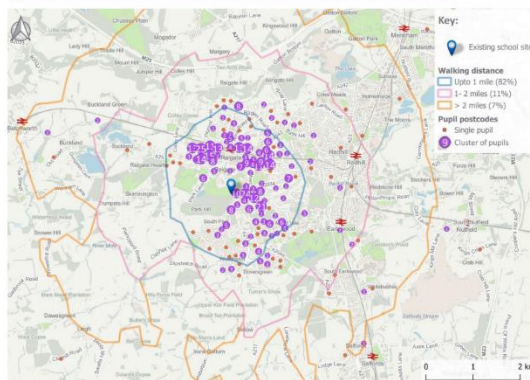
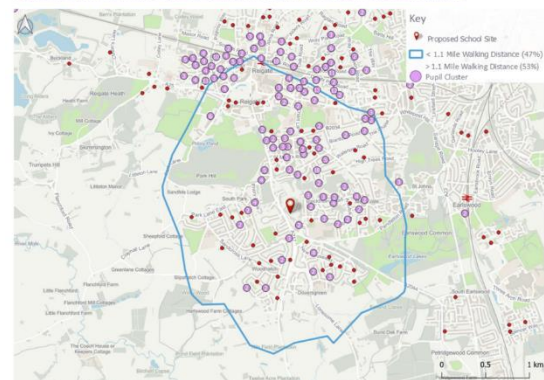


Figure 5-2: Current Pupil Home Postcode Locations in Proximity to Proposed Woodhatch Place Site



- 252 The data shows that approximately 82% of current pupils live within 1 mile of the existing school site which is the distance it would be expected the majority of pupils would commute to/from school by non-car modes. This figure is within the % range pupils are historically recorded to travel by non-car modes of transport. With the school moving approximately 0.7m south of its current location, the future proportion of trips likely to be made by non-car modes will be relative to the number of children that live within 1 mile of the new school location (officer comment: This will obviously differ year on year as new children start at the school and others leave. At the present time accurate figures on future intake should the school be built are not available so estimates are made). The challenges around logistics of managing the school run for the circa 166 families with children in *both* Reigate Priory Junior School and Holmesdale Community Infant School (a main feeder school) are acknowledged in the Transport Assessment, with this specific group of families identified as being most likely to consider a switch to access to school by car. There will also be many families used to travelling by non-car modes, that now find

themselves just outside the typical walk catchment, but likely to continue to do so on the basis they are used to commuting by these modes.

- 253 The change in location of the school effectively means that of the remaining pupils, without any additional intervention/mitigation, 53% are predicted to arrive at the school site by car (including car sharing accounting for sibling arrangements), equating to 318 pupils. Postcode and mode share data that has been collected from pupils and staff shows that there will be a move away from the school's current core catchment, but still well within the school's overall catchment. Travel habits are inevitably likely to change (i.e., an increase in car mode share particularly for families with a child in both Reigate Priory and Holmesdale Community Schools). On this basis an adjusted mode split for pupils has been calculated, which anticipates a higher level of car use for drop-off and pick-up of pupils, though car use is anticipated to reduce over time given Holmesdale Community School's impending reduction in capacity by 1 form or entry and the likely shift in catchment further south.
- 254 Against the above background survey and data, the Transport Assessment then addresses the highways implications arising in respect of the proposed development and sets out the details of the proposal including highways improvements to ensure satisfactory access is provided as follows:
1. The existing Cockshot Hill/ Woodhatch Place junction is proposed to be altered with amendments to geometry to slow vehicles accessing/egressing and minimise the width of the north to south crossing movement for baseline/future pedestrian movements (including adjustments to tactile paving). This will shorten the pedestrian crossing span and will require the existing refuge island to be repositioned. There will also be an increase in footway provision either side of the Woodhatch access, enabling a larger volume of waiting pedestrians and improved pedestrian visibility splays for those waiting to cross from north to south.
 2. The footway into Woodhatch Place on the southern side of the road will also be removed in order to deter pedestrians taking the path of least resistance across Woodhatch Place towards the school access gate, thus encouraging pedestrians to access the site using the dedicated point of access via the internal pedestrian crossing just short of the SCC office access. The junction will accordingly see minor realignment to account for these changes.
 3. The school vehicular access point through Woodhtach Place to the north will be entry-only and will be controlled by a barrier with Automatic Number Plate Recognition (ANPR). This will ensure that access will only be granted to staff and a small number of parent/guardian vehicles (for example, those that live furthest away, or for any future pupils with SEN requirements and this would be managed by the school). An intercom will be provided so that visitor vehicles can also be granted access.
 4. The internal access road will then travel south, past areas of parking. The access road will then gently curve westward to the proposed site vehicular egress point. The proposed egress point will form a staggered junction with the existing junction between Cockshot Hill and Cockshot Hill service road. A second pedestrian access gate will be provided on the south side of the egress, thus catering for some of the demand from the south (including from Dovers Green). Dropped kerbs and tactile paving will also be provided across

the proposed site egress. Pedestrian guard railing is proposed at both access and egress points to safeguard vulnerable road users at both junctions

5. A third pedestrian entrance will be provided to the rear of the site enabling access to the catchment of pupils east and south of the school and to facilitate pupils arriving/departing associated with vehicular drop-off, which will also likely occur on roads in this area to the east of the site
6. The footway on the east side of Cockshot Hill will be increased in width along the frontage of Woodhatch Place.
7. The existing central island on Cockshot Hill in proximity to the proposed egress will be replaced with a central pedestrian refuge. This is required to facilitate pedestrian movements across the carriageway associated with what park and stride (for drop-off and collection) occurs from the west of the site. This includes associated minor improvements to accommodate pedestrians across the verge which separates Cockshot Hill main and secondary roads
8. The proposed on-site car park will provide a total of 57 spaces for staff, which is a provision of 1 space per FTE staff member. A total of three accessible parking spaces are proposed, a short distance from the main entrance to the building. Two minibus parking bays are proposed adjacent to the accessible parking bays. Electric vehicle charging points will be provided for 11 of the staff parking spaces, and for two of the three accessible parking spaces and both of the minibus parking spaces. The on-site car park will be able to accommodate a coach, for the purpose of school trips.
9. The on-site car park will also provide spaces which will operate as a drop-off/pick-up facility. At its current site the school has a 90-space parking allocation in the Bell Street public car park. As such the precedent has been set for drop-off facility use at the school and in the surrounding area. As already stated, due to the relocation of the school site, the proportion of pupils travelling to the school by car will inevitably increase over the short term. While the new school building is to be located in a mostly residential area with on-street parking supply, without mitigation (a package of which is discussed later in this report) there would likely be an impact upon the local resident amenity from the perspective of drop-off and pick-up. The package of mitigation measures therefore includes the provision of a small 26 space dedicated facility for the provision of pupil drop-off and pick-up within the new school site. Given the size and arrangement of the site, the dedicated facility has been proposed so that it consists of parking spaces which allow for stacking in front of the perpendicular long-stay parking. This is considered to make efficient use of the available space on-site, as the timings of staff arrivals and departures will not clash with the times at which pupils are collected and dropped-off and thus they will not be left waiting for the parent/carer vehicles to depart the site. The 26 spaces would be controlled by the school using Automatic Number Plate Recognition at the point of access. This will limit the risk of inappropriate use of the car park.
10. The school will continue to be committed to encouraging non-car modes of transport as far as is reasonably possible and this will include opportunities to increase the non-car mode share through Travel Plan interventions, and as part of the Car Park Management Plan (submitted with the application) which discourages all forms of inappropriate parking locally

11. Cycle/scooter parking stores for long-stay users are proposed to be provided in the hardstanding area located opposite the main entrance to the school building and in a store adjacent to the rear pedestrian access to the site on Hornbeam Road. The stores will provide a total of 80 cycle parking spaces, in the form of 40 Sheffield stands. A further three Sheffield stands, providing a total of six spaces are provided uncovered, for visitors, these are located opposite the main entrance to the school. Cycle/scooter parking usage will be reviewed regularly through the School Travel Plan to understand whether additional capacity will need to be provided. Should demand exceed the available capacity, the Travel Plan Coordinator will arrange for more spaces to be provided
12. The parking analysis shows that with the addition of the school there is adequate capacity provided by the streets surrounding the site together with the drop-off facility to cater for the school demand. In the AM peak period there would be 109 spaces left residual across the whole study area, equivalent to a *worst-case* parking demand of 71% of available capacity. In the School PM peak period, there would be 65 residual spaces left across the whole study area, equating to a *worst-case* parking demand of 83% of available capacity.

255 Transportation Development Planning have assessed the proposals and requested a number of detailed amendments to the off-site highways work including additional measures, which have been discussed with the applicants' highways consultants. These matters can be secured by appropriate conditions attached to any planning permission some requiring the submission of additional details. The conditions suggested by Transportation Development Planning in this regard relate to the following matters:

- Contribution of £50,000 towards signalised pedestrian crossing facilities at the existing Cockshott Hill/Price Lane /Woodhatch Road/Dovers Green Road traffic signals
- Provision of Copenhagen crossings at the entrance and exit to Woodhatch including submission of a technical and road safety audit of these improvements for approval in writing with the Planning Authority prior to implementation
- Extension of the 20mph zone to Lesbourne Road. This should include changing the current 20mph Speed Limit in Town Centre to 20mph speed zone. 20mph zone to include Western Parade, Cockshot Hill service road, Vogan Close, Lime Close and Broadhurst Gardens. Signage to be for a zone not a limit – town centre will require some changes.
- The provision of an additional speed table at the currently proposed northern end of the 20mph zone to fill a large gap in spacing between the last two tables which is currently not acceptable
- The provision of an additional raised table feature between Sandhills Road and Lesbourne Road (or two pairs of cushions to reduce vehicle noise in proximity to residential units)
- Additional yellow lining in Smoke Lane, together with staggered guard railing recessed up Smoke Lane, together with planters, but not at kerb line.
- Provision of a crossing point from Old Pottery Road across Cockshott Hill to cater for children walking in on Public Right of Way 22

- Improvements to the existing pedestrian crossing north of Woodhatch Place to include a pedestrian countdown as part of the signal pedestrian stage
 - The widening of other footways in the vicinity of the site to improve pedestrian access
 - The addition of streetlights at the proposed southern egress from the site
- 256 In response to these matters the applicants submitted an amendment to Appendix I of the Transport Assessment to indicate them in principle. Notwithstanding this, conditions related to all of the above measures are required by Transportation Development Planning and will need to be attached to any permission.
- 257 Several other conditions were suggested by Transportation Development Planning requiring compliance with the submitted drawings and submission of additional information in respect of the following:
- Submission of plans including technical and road safety audits for the proposed new access point onto Cockshot Hill to the south of the site (the egress)
 - Provision of on-site parking and turning
 - Condition relating to time limits on community use on the site to avoid peak times
 - Submission of an amended parking management plan
 - Submission of an amended Construction and Environment Method Statement
 - Submission of an amended Construction Logistics Plan
 - The provision of electric vehicle charging points
 - Submission of an updated Travel Plan Management Plan
- 258 Subject to the suggested conditions Transportation Development Planning have no objections to the proposal.
- 259 A considerable number of the representations made in respect of this proposal raise highways issues and these have been considered in the assessment of this proposal. The applicant was also asked to provide commentary on highways matters raised in representations. Further commentary on some of the recurring concerns/points raised provided by TDP and the applicants transport advisors are set out below:

Highway Safety

- 260 The existing footway on Cockshot Hill is very narrow in places and it has been accepted that this is not adequate bearing in mind the speed of traffic on Cockshot Hill and the increase in footfall anticipated by the relocation of the school. The consultants have therefore prepared a scheme showing the widening of the Eastern footway opposite the southernmost Sandhills Road junction to the entrance of Woodhatch Place and the eastern footway from the proposed crossing point north of the new exit from the school to a point just north of the traffic signals. There is a short length of footway between the two access points which will stay at the current width as it is anticipated that parents will walk into Woodhatch Place from the top or bottom of the site to walk directly into the school. However, if during the process of surveying the road and working up the design it is found to be advantageous to widen the footway all the way through this will be part of the works.

- 261 Where the footway is widened it will vary between 2.5m and 4.5m wide according to the width achievable by reducing the carriageway widths.
- 262 Swept path analysis is not undertaken for footway traffic. The footway will be widened and any unnecessary clutter removed as part of the mitigation scheme.
- 263 Anticipated traffic volumes have been based on the current data available for the existing school and walking isochrones that are the standard for the transport industry. It is agreed that the gradient of Cockshot Hill is off-putting for pedestrians and is particularly challenging for this age group of children, however there are a significant number of children living within the 1.1mile isochrone and it is reasonable to assume that a proportion of them will walk.

Accident Risk

- 264 It is not standard practise to measure pedestrian flows and predict accidents in this way.
- 265 Widening the footways and slowing the speed of traffic on Cockshot Hill with a 20mph zone will significantly reduce the accident risk.

Footways

- 266 Footways are being widened to take the number of children walking into account.

Highway safety Mitigation.

- 267 The 20mph speed zone will be designed to reduce the speed of traffic, within the zone, via physical measures. The mitigation measures will increase the footways to an acceptable standard in accordance with adopted industry standards. The widths are to be increased to achieve widths of between 2.5m and 4.5m.

Traffic Volumes

- 268 It is accepted that there will be an increase in traffic volumes on Cockshot Hill due to the relocation of the school, especially initially while parents and teachers are finding the best routes to and from school. Over time it is likely that the volume of traffic from North to South will decrease as parents will choose schools closest to their home and inevitably the catchment area will change.
- 269 Cockshot Hill will not be the only route to the school for staff, parents and visitors and the predicted numbers driving will spread across other roads.
- 270 There are existing plans to upgrade the existing traffic lights at the Woodhatch Road/ Prices Lane/ Cockshot Hill/ Dovers Green Road Junction which will improve traffic flows southbound.

Junction Capacity

- 271 Junction capacity has been assessed on those routes judged to be used by the greatest number of vehicles. Other junctions will be used but there will be less impact on them as cars will spread over a number of routes that can be taken.

Cycling and walking access.

- 272 Footway access to the school will be improved by the widening of the footways. It is unlikely that children of junior school age will cycle to school. Any cycle provision would be more likely for use by teachers who would be able to use the minor roads around the school to cycle safely.

Travel Modes to school

- 273 As stated previously 82% is the current number of pupils living within 1 mile of the existing Reigate Priory Junior School and the surveyed level of walking to school that has occurred there in the past has been in the region of 70%. There is no suggestion that this will be the number walking after relocation. However it is reasonable to assume that following the mitigation measures slowing traffic and widening footways that a large percentage of those living within 1.1 miles of the school will walk and/or scoot.
- 274 There are 282 children shown living within 1.1 miles of the new location of the school regardless of the total number shown this is 47% of 600. (current school has only 585 pupils so the missing number is 49 who are shown on the previous plan, living further than 2 miles from the school). Whilst 318 children are outside of the 1.1 mile isochrone some of these trips will be undertaken by more than 1 child per car (i.e. siblings and car share) and some on the edge of the 1.1 mile isochrone will still walk in spite of the gradient etc.
- 275 The increase in car journeys is not insignificant but can be satisfactorily accommodated on the highway network without detriment to highways safety. The matter has to be taken in account in the planning balance and against the context of other considerations which apply in this case.

Parking

- 276 The school safety team has many years of experience dealing with safety issues relating to School Travel. In their experience it is the schools in Surrey that have a drop off system in their grounds that are the ones with the worst complaints and congestion because of the blocking back onto the public highway. With this in mind a limited number of spaces within the school curtilage have been provided to cater for those children who require to be dropped off/picked up close to school. This parking will be carefully managed by the school. All other parking will of necessity take place on surrounding roads.
- 277 The number of staff currently driving to the existing school is 65% of the total number of staff - others walk (32%) and a few cycle or take the bus. It is reasonable to assume that the figures for the new location will be in similar proportions and that

with 57 FTE and 17 Part Time Staff the total number of staff parking spaces of 57 will be adequate to meet their needs with no need for part time staff to park on street.

- 278 There are numerous residential roads in close proximity to Woodhatch with on-street parking which is freely available for members of the public to park. The parking survey provided is adequate to demonstrate that there is spare capacity on street where parents will be able to find a convenient parking place.

Conclusion on representations received on highways matters

- 279 Whilst it is accepted that there will be more vehicle trips to the application site than to the existing location, which will lead to more on-street parking in the vicinity of the proposed school, there are sufficient mitigation measures in place to encourage as many parents as possible to walk children to and from the school. The widening of the footways and the reduced speed limit on Cockshot Hill, along with crossing points, should present a safer environment for parents to feel confident to walk with their children to school.

Overall conclusion on highways implications of the proposal

- 280 Officers consider that the highways implications of this proposal have been fully assessed by the applicant and appropriate mitigation and measures have been agreed between them and the County Highways Authority as set out in paragraph 255 above such that the proposal is acceptable in this regard and accords with Development Plan Policy.

SUSTAINABLE CONSTRUCTION

Reigate and Banstead Core Strategy 2014

Policy CS11 – Sustainable Construction

- 281 Core Strategy Policy CS11 expects new non-residential development including replacement buildings to be constructed to a standard of at least BREEAM 'very good'.
- 282 The applicant has submitted a BREEAM pre-assessment report in support of this application which confirms that this project is aspiring to achieve a BREEAM rating of 'Very Good' with a minimum score of 55.0%. On the basis of this pre-assessment, it is anticipated that the overall score of the proposed development will be 65.15% equivalent to an overall BREEAM rating of 'Very Good'. It confirms that this rating could be attained providing all elements of the current assessment route are achieved. The school is set to meet the energy targets set by the London Energy Transformation Initiative (LETI) for schools with energy consumption of less than 65kWh/kWh/ /year and heating demand of less than 15kWh/ /year (this is expanded upon in the section of the report on sustainable design).
- 283 Officers consider that the requirements of the development plan policy have been met in this regard and as the development plan policy does not state that achievement is '*required*', but instead '*expected*' officers do not think it is reasonable or necessary to attach a planning condition in this regard.

Human Rights Implications

- 284 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.
- 285 It is recognised that the development has the potential to have an impact on the local environment and local amenity. Officers consider that these impacts can be addressed through the imposition of planning conditions and that the scale of any potential impacts are not sufficient to engage in Article 8 or Article 1. As such the proposal is not considered to interfere with any Convention right.

CONCLUSION

- 286 The proposal is an application submitted by Surrey County Council under Regulation 3 of the Town and Country Planning General Regulations for the erection of a part one, part two and part three storey building with associated sports pitches and play areas to provide a new 5-form entry junior school as a replacement school for Reigate Priory Junior School.
- 287 The application site is currently part of the grounds of Woodhatch Place, which is now occupied as the main administrative centre for Surrey County Council, and is allocated as Urban Open Land in the Development Plan as well as being the site of non-designated heritage assets.
- 288 The proposal arises out of the urgent need to relocate the existing Reigate Priory Junior School from its existing site within the Reigate Priory, which is a Grade I Listed Building and Scheduled Monument, as well as a statutory Historic Park and Garden. Reigate Priory School has been identified by the Department of Education for inclusion within its Priority School Building Programme 2 as a school whose accommodation does not meet the required standards and is not fit for purpose for educational purposes. The programme targets a number of UK schools in need of being rebuilt or refurbished and envisages that these modified schools would open as soon as possible.
- 289 The application site was chosen following an extensive search for a suitable site undertaken over several years and summarised in the report submitted with the application.
- 290 National Planning Policy Guidance states that local planning authorities should give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications. Development plan policies also encourage development proposals of this nature.
- 291 The proposed new school can be comfortably accommodated on the application site in a way which accommodates the needs and requirements of the new school without serious harm arising to existing residential dwellings or other interests of acknowledged importance. There are areas of impact arising from the proposal which will require additional mitigation measures such as, ecology and biodiversity, impact on non-designated heritage assets and residential amenity and these can be

secured by appropriate planning conditions such that the harm is minimised to an acceptable degree which in all cases is less than significant. There is also a degree of impact arising to the character and appearance of the area but these impacts are not considered to constitute serious harm such that the application should be refused.

- 292 The proposal will lead to the loss of part of an area designated Urban Open Space but officers consider that the proposal can be considered acceptably as an exception to that policy given it is for the essential needs of an existing school and there is no deficiency of open space within this area.
- 293 Officers have weighed all of the aspects of this proposal in the planning balance and consider that the urgent need for the school outweighs the other considerations in this case such that the proposal can be positively and proactively supported and planning permission granted.

Recommendation

- 294 That, pursuant to Regulation 3 of the Town and Country Planning General Regulations 1992, planning application ref: RE22/01796/CON be permitted subject to the following conditions:

Conditions:

IMPORTANT - CONDITION NOS 4, 11, 12 AND 18 MUST BE DISCHARGED PRIOR TO THE COMMENCEMENT OF THE DEVELOPMENT.

1. The development to which this permission relates shall be begun not later than the expiration of three years beginning with the date of this permission.
2. The development hereby approved shall be carried out in all respects in accordance with the following plans/drawings:

1138822-NOV-V2-00-DR-A-PL01 dated 1 July 2022 Site Location Plan dated 25 May 2022

1138822-NOV-V2-XX-DR-A-PL14 Proposed Site Block Plan dated January 2022

1138822-NOV-V1-00-DR-A-PL04 Proposed Ground Floor Plan dated 25 May 2022

1138822-NOV-V1-01-DR-A-PL05 Proposed First Floor Plan dated 25 May 2022

1138822-NOV-V1-02-DR-A-PL06 Proposed Second Floor Plan dated 25 May 2022

1138822-NOV-V1-03-DR-A-PL07 Proposed Roof Plan dated 25 May 2022

1138822-NOV-V1-ZZ-DR-A-PL08 Proposed Elevations - Sheet 1 of 2 dated 25 May 2022

1138822-NOV-V1-ZZ-DR-A-PL09 Proposed Elevations - Sheet 2 of 2 dated 25 May 2022

1138822-NOV-V1-ZZ-DR-A-PL10 Proposed Building Sections dated 18 May 2022

1138822-NOV-V2-XX-DR-A-PL12 Existing Building Plans and Elevations dated 18 May 2022

1138822-NOV-V2-XX-DR-A-PL13 Site Demolition Plan dated 25 May 2022

1138822-UBU-XX-XX-DR-L-1004 Pitches Layout Plan dated 20 June 2022

1138822-UBU-XX-XX-DR-L-1006 Site Section A-A dated 8 June 2022

1138822-UBU-XX-XX-DR-L-1007 Site Section B-B dated 8 June 2022

1138822-UBU-XX-XX-DR-L-1008 Site Section C-C dated 8 June 2022

1138822-UBU-XX-XX-DR-L-1009 Site Section D-D dated 8 June 2022

1138822-UBU-XX-XX-DR-L-1010 Site Section E-E dated 8 June 2022

1138822-UBU-XX-XX-DR-L-1011 Site Section F-F dated 8 June 2022

1138822-UBU-XX-XX-DR-L-1012 Site Section G-G dated 8 June 2022

1138822-UBU-XX-XX-DR-L-3000 Planting Plan dated 20 June 2022

1138822-ENS-XX-XX-PL-Y-0001 Topographical Survey Sheet 1 of 4 dated February 2022

1138822-ENS-XX-XX-PL-Y-0002 Topographical Survey Sheet 2 of 4 dated February 2022

1138822-ENS-XX-XX-PL-Y-0003 Topographical Survey Sheet 3 of 4 dated February 2022

1138822-ENS-XX-XX-PL-Y-0004 Topographical Survey Sheet 4 of 4 dated February 2022

1138822-NOV-V2-XX-DR-A-PL02 Existing Site Plan dated 25 July 2022

1138822-NOV-V2-ZZ-DR-A-PL03 Proposed Site Plan dated 25 July 2022

1138822-UBU-XX-XX-DR-L-1001 Existing Landscape Plan dated 20 July 2022

1138822-ACM-XX-XX-DR-C-0100 Utility Services dated 27 July 2022

1138822-ACM-XX-00-DR-E-0401 External Lighting - Ground level dated 20 July 2022

1138822-ACM-XX-00-DR-E-0402 External Lighting - Ground level dated 20 July 2022

1138822-ACM-XX-00-DR-E-0403 External Lighting - Ground level dated 20 July 2022

1138822-ACM-XX-00-DR-E-0404 External Lighting - Ground level dated 20 July 2022

3. The development hereby permitted shall not be used or occupied unless and until the applicant has contributed a sum of £50,000 to the County Highways Authority towards signalised pedestrian crossing facilities at the existing Cockshott Hill/Price Lane /Woodhatch Road/Dovers Green Road traffic signals.
4. Prior to the commencement of the development hereby permitted details of the alterations to the existing access into the Woodhatch site (including technical and road safety audit information) shall be submitted to and approved in writing by the County Planning Authority. The development shall be implemented in accordance with the approved details.
5. Prior to the first occupation of the development hereby permitted the off-site highways works required as part of the development (as listed below and generally indicated on drawings 21/164 T 037B, 038B, 039B, 40B, 051A, 052A, 053A, 054A, 055A, 056A) shall be completed in accordance with detailed plans to be submitted to and approved in writing by the County Planning Authority.
 - Provision of Copenhagen crossings at the entrance and exit to Woodhatch including submission of a technical and road safety audit of these improvements for approval in writing with the Planning Authority prior to implementation
 - Extension of the 20mph zone to Lesbourne Road. This should include changing the current 20mph Speed Limit in Town Centre to 20mph speed zone. 20mph zone to include Western Parade, Cockshot Hill service road, Vogan Close, Lime Close and Broadhurst Gardens. Signage to be for a zone not a limit – town centre will require some changes.
 - The provision of an additional speed table at the currently proposed northern end of the 20mph zone to fill a large gap in spacing between the last two tables which is currently not acceptable
 - The provision of an additional raised table feature between Sandhills Road and Lesbourne Road (or two pairs of cushions to reduce vehicle noise in proximity to residential units)
 - Additional yellow lining in Smoke Lane, together with staggered guard railing recessed up Smoke Lane, together with planters, but not at kerb line.
 - Provision of a crossing point from Old Pottery Road across Cockshott Hill to cater for children walking in on Public Right of Way 22
 - Improvements to the existing pedestrian crossing north of Woodhatch Place to include a pedestrian countdown as part of the signal pedestrian stage
 - The widening of other footways in the vicinity of the site to improve pedestrian access
 - The addition of streetlights at the proposed southern egress from the site
6. Prior to the occupation of the development hereby permitted the proposed new access point onto Cockshot Hill to the south of the site shall be provided in accordance with detailed plans (including technical and road safety audits) to be submitted and approved in writing by the County Planning Authority.
7. The development hereby permitted shall not be first occupied unless and until space has been laid out within the site in accordance with the drawing 1138822 UBU XX XX DR 1000 Rev 07 attached at Appendix A of the Velocity Transport Planning Transport

Assessment Version P01 dated June 2022 for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking and turning areas shall be retained and maintained for their designated purpose.

8. Apart from after school activities for staff and pupils at the school, use of any of the school buildings by the wider community shall not commence until after 1700h Monday to Friday inclusive.
9. Prior to the occupation of the development hereby permitted a revised Parking Management Plan shall be submitted for approval by the County Planning Authority to include:
 - Details of the criteria to be used for school pupils to be eligible for the use the proposed drop off and pick up spaces.
 - Arrangements for controlling parking by staff, visitors, and parents using the drop off and pick up spaces.
 - End of school day arrangements for pupils using the pick up spaces.

The development hereby permitted shall be implemented in accordance with the approved Parking Management Plan.

10. Within three months of the occupation of the development hereby permitted a review of parking demand on Broadhurst Gardens, Lime Close, Vogan Close, West Parade, Woodhatch Road, Hornbeam Road, and Holy Road shall be undertaken, and the results shall be submitted to and approved in writing by the County Planning Authority.

The review shall include an assessment of parking demand in each of the above roads and if this impacts the free flow of traffic on those roads the submitted document shall propose appropriate parking restrictions following discussions with the County Highway Authority. The parking restrictions shall be implemented within three months following approval of the details.

11. Prior to the commencement of the development hereby permitted a revised Construction and Environment Management Plan shall be submitted for approval by the County Planning Authority. This can be based on the information submitted with the Construction Environmental Method statement but will be expanded to include the following details:
 1. Details of deliveries and confirmation of no deliveries and collections to the site during the construction phase between 0800hrs and 0900hrs or after 1700h.
 2. Details of construction hours
 3. Details of specialist machinery to be used in construction on site with noise predictions, mitigation measures if required and hours of use
 4. Details of the management of dust during construction
 5. Details of the precautionary methods of working for all protected and non protected species and as recommended in the Environmental Impact Assessment and Bat Survey submitted with the application
 6. Details of vegetation clearance in respect of nesting birds
 7. Outline of details to ensure compliance with industry good practice and considerate contractor guidance during site establishment works e.g. prevention of surface and ground water pollution, and fugitive dust management, noise prevention or amelioration and lighting control to minimise the potential for environmental pollution

8. Assessment of impact/mitigation if appropriate in respect of Barnard's Sandpit SNCI

The development shall be implemented in accordance with the approved Construction and Environment Method Statement

12. Prior to the commencement of the development hereby permitted a revised Full Construction Logistics Plan shall be submitted for approval to the County Planning Authority. This should include details of:
 - a. Arrangements for separating vehicular and pedestrian traffic.
 - b. Parking for vehicles of site personnel, operatives and visitors.
 - c. Loading and unloading of plant and materials.
 - d. Storage of plant and materials.
 - e. Programme of works (including measures for traffic management).
 - f. Provision of boundary hoarding behind any visibility zones.
 - g. Before and after construction condition surveys of the highway and a commitment
 - h. Measures to prevent the deposit of materials on the highway

The development shall be implemented in accordance with the approved Construction Logistics Plan.

13. Prior to the occupation of the development hereby permitted 11 of the staff parking spaces and 5 of the visitor parking spaces shall be provided with a fast charge socket (current minimum requirements - 7kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) and 11 of the staff parking spaces and 5 of the visitor parking spaces shall be provided with an electrical supply to retrofit electric vehicle charging points, in accordance with a scheme to be submitted and approved by the County Planning Authority. The charging points shall thereafter be retained and available for use.
14. Prior to the occupation of the development hereby permitted a revised School Travel Plan shall be submitted for approval by the County Planning Authority. The document shall be prepared in accordance with the sustainable development aims and objectives of the National Planning Policy Framework 2021, and advice within Surrey County Council's "Travel Plans Good Practice Guide". The approved Travel Plan shall be implemented upon first occupation and thereafter maintained and developed in accordance with provisions in this regard included within the document.
15. Prior to the occupation of the development hereby permitted a revised Delivery and Servicing Plan shall be submitted for approval by the County Planning Authority. This shall include details, including a plan to indicate:
 1. That deliveries and collections will be scheduled.
 2. How and when the on-site parking of 57 staff spaces, 3 accessible spaces, 2 minibus spaces and 26 drop off spaces would be available for deliveries/services having regard to the Parking Management Plan.

The development shall be implemented in accordance with the approved Delivery and Servicing Plan.

16. Prior to the installation of the surface water drainage for the development hereby permitted the following details of the design of a surface water drainage scheme shall be submitted to and approved in writing by the County Planning Authority. The design must satisfy the SuDS Hierarchy and be compliant with the national NonFlood Risk,

- a) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+40% allowance for climate change) storm events, during all stages of the development. Associated discharge rates and storage volumes shall be provided using a maximum staged discharge rate of 5.3 l/s 1 in 1year, 10 litres/sec 1 in 30 year and 1 in 100yr + CC.
- b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.). Including details of the proposed green roof and permeable paving system.
- c) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.
- d) Details of drainage management responsibilities and maintenance regimes for the drainage system.
- e) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

The development shall be implemented in accordance with the approved details.

17. The development hereby permitted shall be implemented in accordance with the programme of archaeological works set out in the Written Scheme of Investigation Project number: 60671146 1138822-ACM-XX-XX-RP-Z-0006 dated August 2022 prepared by AECOM Ltd submitted with the application
18. Prior to the commencement of the development hereby permitted a detailed Arboricultural Method Statement shall be submitted for approval to the County Planning Authority. This shall include the following details
 - Reference to other relevant conditions of the planning consent
 - Pre commencement meeting and site briefing
 - Tree removal Plan
 - Order and phasing of operations
 - Details of tree works (including the root pruning of trees T2, T17, T27, T33, T35, T44 and T48 under the supervision of an arboriculturist)
 - Tree protection fencing prior to commencement
 - Ground protection
 - Site storage and facilities
 - Movement of people, plant and materials
 - Enabling works
 - Installation of new surfacing both hard and soft near retained trees
 - Installation of new structures near retained trees
 - Installation of new services including surface water retention tank and/or diversion of existing services
 - Removal of tree protection measures

The development shall be implemented in accordance with the approved document.

19. Prior to the installation of any external lighting on the site, including the lighting indicated on the submitted lighting plan and any temporary lighting required during construction, details shall be submitted for approval by the County Planning Authority to demonstrate measures to reduce lighting spills on woodland and waterbodies habitat having regard to Bat Conservation Trust lighting guidance. The development shall be implemented in accordance with the approved details.
20. External lighting on the site shall be switched off at all times when the school is not in use.
21. Notwithstanding the provisions of the Town and Country Planning General Permitted Development Order 1995 there shall be no additional external lighting installed on the site without the prior written consent of the County Planning Authority.
22. Details of all external plant to be installed on the building or within the curtilage shall be submitted for approval by the County Planning Authority prior to its installation including details of how it meets the noise limits set out in condition 23 below.
23. The Rating Level, L_{Ar,Tr}, of the noise emitted from all plant, equipment and machinery, associated with the application site shall not exceed the existing representative LA₉₀ background sound level at any time by more than +5 dB(A) at the nearest noise sensitive receptors (residential or noise sensitive building). The assessment shall be carried out in accordance with the current version of British Standard (BS) 4142:2014 'Methods for rating and assessing industrial and commercial sound'. The existing representative LA₉₀ background sound level is determined in 'Reigate Priory School. External Noise Survey Report', prepared by AECOM, dated 22 December 2021 (Ref: Project number: 60671146 1138822-ACM-XX-XX-O-1001).
24. Notwithstanding the provisions of the Town and Country Planning General Permitted Development Order 1995 no plant other than that approved in accordance with this condition shall be installed on the site without the written permission of the County Planning Authority.
25. Noise levels from construction works during standard construction hours shall not exceed 70 dB(A) L_{Aeq,1h} at 1 m from the façade of any noise sensitive receptors (residential or noise sensitive building) within the vicinity of the site or calculated from measurements taken at the site boundary. Noise generating works shall not take place outside of the hours permitted in the approved Construction and Environment Management Plan required in accordance with condition 11 without prior consent from the County Planning Authority.
26. Prior to the use of the external play areas and sports pitches hereby permitted a fence shall be erected on land within the applicants ownership adjacent to The Belvederes residential development in accordance with details to be submitted to and approved by the County Planning Authority. The fence shall be designed to provide noise mitigation and prevention of direct overlooking and shall be based on the results of a noise assessment taken at the residential dwellings and agreed with the occupiers of the dwellings directly facing the school site. The approved fence shall be retained.
27. The all-weather playing facilities hereby permitted shall only be used in connection with the school use and shall not be used by external users outside of school hours.
28. The all-weather playing facilities hereby permitted shall not be used after 20.00hrs at any time

29. The pedestrian access into the site from Hornbeam Road shall only be used during peak arrival and departure times and outside of those times shall be kept locked
30. Prior to the installation of the boundary fence along the Cockshot Hill frontage of the site details of the siting, height, design, materials and colour shall be submitted for approval by the County Planning Authority and the development shall proceed in accordance with the approved details
31. Prior to the occupation of the development hereby permitted a detailed landscaping scheme shall be submitted for approval to the County Planning Authority.

This scheme shall encompass all of the proposed on and off-site hard and soft landscaping and shall address the recommendations within the Ecological Impact Assessment and Biodiversity Net Gain Report submitted with this application to provide the maximum level of biodiversity achievable in connection with the development. The landscaping scheme shall include measures to secure the following

- Additional landscaping and specimen tree planting outside of the northern and eastern boundary of the application site (north and east of the existing pond) to screen and soften the impact of the fencing when viewed from the north and the locally listed building and the east
- additional tree and landscape planting within the 'thicket planting' zone separating the proposed school building from The Belvederes. New trees can be stature species such as fastigate field maple, which are robust and can cope with a constrained planting environment

The landscaping scheme shall include replacement tree planting with detailed specification provided, detailing, species, sizes (recommend 14-16cm extra heavy standard in size or less to ensure proper establishment), planting arrangement, planting pit details, watering/staking arrangement.

All hard and soft landscape works shall be carried out in accordance with the approved details and to a standard in accordance with the relevant recommendations of British Standard BS 4428:1989. The works shall be carried out prior to the occupation of any part of the development or in accordance with the timetable agreed with the County Planning Authority. Any trees or plants that, within a period of five years after planting, are removed, die or become seriously damaged or defective, shall be replaced with others of species, size and number as originally approved, by the end of the first available planting season thereafter.

Where new trees are to be planted into a hard-surfaced environment (i.e. within or in close proximity to roads, footways, other hard surfacing and underground utilities), best practice recommends the use of proprietary underground cellular systems/structural soils/root barriers etc. in order to prevent compaction, restriction of the rooting environment and conflict with utilities and to maximise the tree life expectancy and establishment needs. This needs to be considered as part of the detailed design for landscaping.

A detailed existing/proposed services plan needs to be provided and relevant sections of the arb report (Section 5.9) need to be strictly adhered to and where required a method statement worked up for approval- which should identify the requirement for air lance excavation or trenchless 'impact moling' if unable to be outside of RPA's

Details of the biodiverse green roof in combination with solar panels for the proposed school building including section drawings showing the depth and type of substrate and details of planting. The ecological benefits of this should be maximised and a deep substrate should be used allowing the use of plug planting or similar, and invertebrate hibernacula such as log piles. A reputable blue/green roof contractor should be used to advise on the engineered roof layers together with appropriate integration of the solar panel mounts.

32. Prior to the occupation of the development hereby permitted a Biodiversity Landscape and Ecology Management Plan shall be submitted to and approved in writing by the County Planning Authority.

The content of the LEMP shall include the following.

- a) Description and evaluation of features to be managed.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over at least a five-year period).
- g) Details of the body or organization responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the applicant with the management body(ies) responsible for its delivery.

The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

The above to be in line with British Standards BS42020:2013

The development shall be implemented in accordance with the approved details.

Reasons:

1. To comply with Section 91 (1)(a) of the Town and Country Planning Act 1990 as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004.
2. For the avoidance of doubt and in the interests of proper planning.
3. In order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2021 and Policy TAP1 of the Reigate and Banstead Local Plan Development Management Plan 2019.

4. In order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2021 and Policy TAP1 of the Reigate and Banstead Local Plan Development Management Plan 2019. This condition is required pre-commencement to safely facilitate access to the site for traffic during the construction phase
5. In order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2021 and Policy TAP1 of the Reigate and Banstead Local Plan Development Management Plan 2019
6. In order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2021 and Policy TAP1 of the Reigate and Banstead Local Plan Development Management Plan 2019
7. In order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2021 and Policy TAP1 and TAP2 of the Reigate and Banstead Local Plan Development Management Plan 2019
8. In order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2021 and Policy TAP1 of the Reigate and Banstead Local Plan Development Management Plan 2019
9. In order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2021 and Policy TAP1 and TAP2 of the Reigate and Banstead Local Plan Development Management Plan 2019
10. In order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2021 and Policy TAP1 and TAP2 of the Reigate and Banstead Local Plan Development Management Plan 2019
11. In order that the development should not prejudice highway safety, nor cause inconvenience to other highway users during peak traffic times, in accordance with the National Planning Policy Framework 2021 and Policies DES8 and TAP1 of the Reigate and Banstead Local Plan Development Management Plan 2019. This condition is required pre-commencement of the development hereby permitted as it relates to the construction phase
12. In order that the development should not prejudice highway safety, nor cause inconvenience to other highway users during peak traffic times, in accordance with the National Planning Policy Framework 2021 and Policies DES8 and TAP1 of the Reigate and Banstead Local Plan Development Management Plan 2019. This condition is required pre-commencement of the development hereby permitted as it relates to the construction phase
13. In accordance with National Planning Policy Framework 2021 and Policy CS10 of Reigate and Banstead Core Strategy 2014
14. In accordance with National Planning Policy Framework 2021 and Policy CS10 and CS17 of Reigate and Banstead Core Strategy 2014

15. In order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2021 and Policy TAP1 and TAP2 of the Reigate and Banstead Local Plan Development Management Plan 2019
16. To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS10 and Reigate and Banstead Local Plan Development Management Plan 2019 Policies CCF2 and INF1
17. To ensure the development does not have any adverse impact on heritage assets accordance with the requirements of Policy NHE9 of the Reigate and Banstead Local Plan Development Management Plan 2019
18. In order to ensure the adequate protection and retention of existing trees on the site, some of which are protected by a Tree Preservation Order in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS2 and Reigate and Banstead Local Plan Development Management Plan 2019 Policy NHE3. This condition is required pre-commencement as it relates to details needing to be implemented and monitored during the construction phase of the development
19. Having regard to ecological interests and residential amenity in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS2 and CS10 and Reigate and Banstead Local Plan Development Management Plan 2019 Policy NHE2, Policy NHE3, DES1 and DES9
20. In the interests of the amenities of neighbouring dwellings in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS10 and Reigate and Banstead Local Plan Development Management Plan 2019 Policy DES1 and Policy DES9
21. In the interests of the amenities of neighbouring dwellings in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS10 and Reigate and Banstead Local Plan Development Management Plan 2019 Policy DES1 and Policy DES9
22. In the interests of the amenities of neighbouring dwellings in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS10 and Reigate and Banstead Local Plan Development Management Plan 2019 Policy DES1 and Policy DES9
23. In the interests of the amenities of neighbouring dwellings in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS10 and Reigate and Banstead Local Plan Development Management Plan 2019 Policy DES1 and Policy DES9
24. In the interests of the amenities of neighbouring dwellings in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS10 and Reigate and Banstead Local Plan Development Management Plan 2019 Policy DES1 and Policy DES9
25. In the interests of the amenities of neighbouring dwellings in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS10 and Reigate and Banstead Local Plan Development Management Plan 2019 Policy DES1 and Policy DES9

26. In the interests of the visual amenity of the area having regard to the prominence of this part of the site and in accordance with Reigate and Banstead Development Management Plan 2019 Policy DES1
27. In the interests of the amenities of neighbouring dwellings in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS10 and Reigate and Banstead Local Plan Development Management Plan 2019 Policy DES1 and Policy DES9
28. In the interests of the amenities of neighbouring dwellings in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS10 and Reigate and Banstead Local Plan Development Management Plan 2019 Policy DES1 and Policy DES9
29. In the interests of the amenities of neighbouring dwellings in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS10 and Reigate and Banstead Local Plan Development Management Plan 2019 Policy DES1 and Policy DES9
30. In the interests of the amenities of neighbouring dwellings in accordance with Reigate and Banstead Local Plan Core Strategy 2014 Policy CS10 and Reigate and Banstead Local Plan Development Management Plan 2019 Policy DES1 and Policy DES9
31. To ensure that the proposal provides appropriate mitigation and compensation for ecological and biodiversity impacts including loss of existing trees, and visual impact on locally listed heritage assets, and in the interests of the visual amenity of the area and the residential amenity of neighbouring dwellings in accordance with Policies CS2 and CS10 of the Reigate and Banstead Local Plan Core Strategy 2014 and policies NHE9, NHE2, NHE3, NHE4 of the Reigate and Banstead Local Plan Development Management Plan 2019
32. To ensure that the proposal provides appropriate mitigation and compensation for ecological and biodiversity impacts including loss of existing trees, and visual impact on locally listed heritage assets, and in the interests of the visual amenity of the area and the residential amenity of neighbouring dwellings in accordance with Policies CS2 and CS10 of the Reigate and Banstead Local Plan Core Strategy 2014 and policies NHE9, NHE2, NHE3, NHE4 of the Reigate and Banstead Local Plan Development Management Plan 2019

Informatives:

1. .The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road.

Please see

<http://www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/the-traffic-management-permit-scheme>.

The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see

www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice.

2. The applicant 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 street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.
3. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
4. Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage
5. The applicant is expected to ensure the safe operation of all construction traffic in order to prevent unnecessary disturbance obstruction and inconvenience to other highway users. Care should be taken to ensure that the waiting, parking, loading and unloading of construction vehicles does not hinder the free flow of any carriageway, footway, bridleway, footpath, cycle route, right of way or private driveway or entrance. Where repeated problems occur the Highway Authority may use available powers under the terms of the Highways Act 1980 to ensure the safe operation of the highway
6. 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. Please refer to:

<http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicle-infrastructure.html>

for guidance and further information on charging modes and connector types.

7. The developer is reminded that the revised travel plan should comply with Modeshift Stars format.

Contact Dawn Horton-Baker

Tel. no. 020 8541 9435

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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 Reigate & Banstead Borough Council planning register for this application can be found under application reference RE22/01796/CON.

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

Government Guidance

[National Planning Policy Framework](#)

[Planning Practice Guidance](#)

The Development Plan

Reigate and Banstead Core Strategy 2014

Reigate and Banstead Development Management Plan 2019

Other Documents

Reigate and Banstead Historic Parks and Gardens Supplementary Planning Document 2020
