 <b>Reigate &amp; Banstead</b> <b>BOROUGH COUNCIL</b> Banstead   Horley   Redhill   Reigate	<b>TO:</b>		PLANNING COMMITTEE
	<b>DATE:</b>		3 <sup>rd</sup> October 2018
	<b>REPORT OF:</b>		HEAD OF PLACES & PLANNING
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<b>AGENDA ITEM:</b>	5	<b>WARD:</b>	Merstham

<b>APPLICATION NUMBER:</b>	17/01929/OUT	<b>VALID:</b>	25 <sup>th</sup> August 2017
<b>APPLICANT:</b>	RV Developments & The Burr Family	<b>AGENT:</b>	Tetlow King Planning
<b>LOCATION:</b>	<b>LAND TO THE NORTH OF ROCKSHAW ROAD, MERSTHAM</b>		
<b>DESCRIPTION:</b>	Outline application for the development of land to the north of Rockshaw Road to consist of the development of 4 detached dwellings (use class c3) and an extra care scheme of up to 85 units comprising of apartments and cottages (use class c2); associated communal facilities; provision of vehicular and cycle parking together with all necessary internal roads and footpaths; provision of open space and associated landscape works; and ancillary works and structures.		
All plans in this report have been reproduced, are not to scale, and are for illustrative purposes only. The original plans should be viewed/referenced for detail.			

This application is referred to Planning Committee given the planning issues raised and significant public interest in the application.

## SUMMARY

This application is made in outline with all matters reserved other than access. It seeks permission for the development of 4 detached houses and an extra care scheme of up to 85 units (apartments and cottages) with communal facilities and associated works. The application site incorporates two separate areas of land along Rockshaw Road.

Both sites are within the Metropolitan Green Belt and fall wholly within the Area of Great Landscape Value. Furthermore, a part of the easternmost site (proposed for the extra care scheme) is within the Surrey Hills Area of Outstanding Natural Beauty.

The sites are both presently undeveloped, greenfield land. The proposals – whilst in outline – would involve the erection of extra care housing, private dwellings and significant associated supporting infrastructure. They would therefore, without doubt, be inappropriate development which is by definition harmful to the Green Belt. Furthermore, the introduction of a significant urbanising development of the nature proposed is considered to result in a significant erosion of openness and a demonstrable and harmful encroachment into the

countryside. In totality, the harm to the Green Belt is considered to be very significant and should be afforded substantial weight as per national policy. Very special circumstances are therefore required.

The proposals are considered to represent major development within the Area of Outstanding Natural Beauty which the Framework advises should only be permitted in exceptional circumstances and where the development is demonstrated to be in the public interest. Furthermore, whilst in outline, it is considered that the proposals would give rise to adverse impacts on the landscape of the Area of Outstanding Natural Beauty, and the Area of Great Landscape Value which would be particularly appreciable and significant to sensitive localised receptors, including Rockshaw Road and the North Downs Way which runs alongside the site; but would also be appreciated in long range views on higher ground to the north of the M23. Whilst the assessment in the applicant's LVIA of the impacts on the landscape are acknowledged, in this case, the conclusions of the Surrey Hills AONB Officer as specified at paragraph 6.22 of the report below are supported. It is therefore concluded that the proposal would give rise to a significant, fundamental and harmful change in the landscape character of the locality which would be contrary to Pc1 of the Local Plan and CS2 of the Core Strategy.

The application sites are adjacent to the Rockshaw Road Conservation Area and there are further statutory and locally listed buildings in the locality. Although the application is in outline and further detailed assessment of the impact on built character and heritage would be required in due course, it is concluded that, based on the information available and situation of the site, an acceptable design and layout reflecting local distinctiveness and preserving the character and setting of the surrounding heritage assets could be achieved. The Conservation Officer has raised no objection in respect of the impact on heritage assets. These conclusions do not however negate the landscape effects discussed above.

A number of concerns are identified in relation to the accessibility, transport and highways implications of the proposals and there remains an objection to the proposals from the County Highway Authority (CHA). Firstly, the site is not considered to be accessibly located for the purposes of policy Ho21 of the Local Plan and CS14 of the Core Strategy given the distance to day-to-day shops and services and public transport; this fact is also highlighted by the County Highway Authority. Whilst the applicant has included an intention to provide a dedicated minibus service and Travel Plan in an attempt to mitigate against significant over-reliance on the private car, the CHA has confirmed in their response that inadequate or insufficient detail has been provided in respect of both to enable them to conclude that these would be effective in promoting sustainable transport. The CHA also concludes that there is insufficient explanation and evidence to support the applicant's trip generation assumptions such that they are unable to fully appraise the transport impacts of the proposals. Further concerns are also raised by the CHA in respect of the proposed traffic calming measures on Rockshaw Road which they conclude would be both out of character with the semi-rural road and would likely do more harm than good. Whilst it is understood there was some dialogue between the applicant and CHA with a view to resolving these issues, no additional or amended information has been submitted following this and thus the objection remains.

Detailed assessment of neighbour amenity impacts would need to be undertaken as part of the assessment of any reserved matters. However, given the characteristics and size of the sites and taking account of the likely scale, footprint, massing and layout required to

achieve the proposed development, it is concluded that an acceptable relationship with neighbours would be achievable.

The proposals would provide extra care housing and private market dwellings. With respect to the latter, the applicant agrees that a financial contribution towards affordable housing would be required through a legal agreement. However, no such agreement is in place, it forms a further technical reason for refusal. With respect to the extra care housing, whether or not affordable housing is required depends upon whether it falls within a class C2 (residential institution) use or a class C3 (residential dwelling house) use under the Use Class Order 1987 (as amended). Officers have given careful consideration to this issue and taking account of the nature of the proposals, the applicant's intention to sign up to a legal agreement limiting occupation of the units (as described further in the main report) and appeals decisions and court judgements on this exact issue, it is concluded that the extra care proposals would, on balance, be a class C2 use. However, as a legal agreement securing the occupancy restrictions is not yet in place, a further technical reason for refusal is recommended.

Turning to the benefits of the scheme and the planning balance, the applicant advances a number of considerations in favour of the scheme which in their view are of sufficient weight to justify the proposals in Green Belt, landscape and overall planning terms. The most prominent reason advanced by the applicant is the need for specialist extra care housing and the applicant's assessment that this could not be met in any other way. In this regard, whilst it is accepted that there is evidence that there is some need for extra care housing in the borough which this scheme would potentially contribute to, it is not agreed that the scale of need is as great as that suggested by the applicant. Furthermore, the conclusions of the applicant's "sequential test" that the need could not be met on any other site are disputed, particularly given the allocations identified within the emerging Development Management Plan and the other mechanisms (including adaptation of existing homes) through which the needs of those with care requirements can be met. Taking this into account, only moderate weight is attached to the argument of unmet needs. The applicant also advances a range of other benefits, including social and economic benefits, which are also acknowledged and considered to attract varying degrees of weight in the planning balance.

However, these considerations are not considered, either individually or cumulatively, to clearly outweigh the very significant harm to the Green Belt, and other harm including landscape impacts. It is therefore concluded that very special circumstances do not exist to justify the development. Similarly, the arguments advanced by the applicant are not considered to represent the exceptional circumstances necessary to justify this major development in the AONB and prove that it would be in the public interest.

## **RECOMMENDATION(S)**

Planning permission is **REFUSED**.

## Consultations:

County Highway Authority: Objects and recommends refusal on highway and transportation grounds. The detailed response of the CHA concludes:

*This is an outline planning application, which seeks approval for access only. However, given the nature and scale of the proposed development, the County Highway Authority (CHA) is not able to fully assess the highway and transportation implications of the proposed development, or comment on access, unless and until more detailed information has been provided in relation to the site layout, the type and mix of units/beds, staff requirements, parking provision, servicing arrangements and level of care to be provided.*

*The CHA has a number of highway safety and sustainability concerns in respect of the proposed development and is not yet satisfied that the development would be compatible with the local highway infrastructure.*

The concerns raised by the CHA can be summarised as:

- The proposed traffic calming scheme is not acceptable on highway safety grounds, is out of character with Rockshaw Road and “could lead to more harm than good on the highway network”.
- A need for amendments to the Framework Travel Plan, including a need to include objectives, targets and measures for residents as well as staff
- Access to and from the site for pedestrians is a concern given the elderly age and high speed of traffic and additional improvements including uncontrolled crossing points and extended footways are required
- The distance of the site to bus services exceeds recommended maximum walking distances and thus residents and staff are unlikely to travel to and from the site by bus
- Insufficient detail has been provided to demonstrate that the proposed dedicated minibus service would be effective in encouraging sustainable travel
- Further evidence required to justify trip generation assumptions and calculations

Surrey Hills AONB Planning Adviser: Provides detailed comments on the impacts of the proposals on landscape character and the AONB/AGLV. Notes onus on the Planning Authority to consider the “case” for the development proposed but that this would need to “*be so compelling as clearly to outweigh the great weight needing to be given to conserving this protected landscape*” and recommends a reason for refusal on AONB grounds in the event that the Planning Authority finds the case to be insufficient. The response critiques the Landscape and Visual Impact Assessment submitted in support of the application and reaches the following conclusion:

*“In drawing this together I consider that the proposed development would fundamentally change the character of the locality from a landscape dominated area justifying inclusion in the national AONB landscape designation with the highest level of protection it enjoys and the associated more local AGLV designation, to a suburban character where buildings would have significantly greater visual impact such as to dominate the landscape. The change would be so significant that the area might not be worthy of continued AONB designation”.*

Tree Officer: No objection subject to conditions. Detailed comments as follows:

*"I have undertaken a desk top study he proposed development reviewed the submitted Arboricultural information which has been compiled in accordance with the guidelines, advice and recommendation contained within British Standard 5837. I am familiar with this location and the surrounding landscape and have not undertaken a detailed site assessment on this occasion. The Arboricultural submission contains an Arboricultural Impact Assessment (AIA) and an Arboricultural Method Statement (AMS).*

*The AIA identifies the impact on existing trees and vegetation and whilst most of the trees that would be lost to this development are low quality self-sown, scrub there are some trees within group G5 of the survey comprising of ash sycamore and wild cherry that have been categorised B. The removal of these trees would not have any significant impact on the character and appearance of the local landscape, nor would it have any adverse effect on the conservation arear to the south.*

*The loss of the trees identified within the AIA would not provide a sustainable reason for refusal of this application.*

*The AMS set out the methods of tree protection, supervision and monitoring which are general, as the application is outline finalisation of service routing etc. would need to be considered and this would involve a 'Finalised' AMS and TPP (tree protection Plan).*

*The proposed development would also provide an opportunity for replacement and additional tree planting and landscape should the proposed development be recommended for consent."*

Contaminated Land Officer: No objection subject to conditions. Notes that the submission identified potential for localised ground contamination due to historic uses (e.g. pit workings) and that the site is within the potential zone of influence of a historic landfill situated to the north-west of the site.

Environmental Health (Air Quality): No objection on air quality grounds. Notes that the submitted Air Quality Assessment has assumed worst case but still demonstrates that air quality impacts would not be unacceptable.

Natural England: No objection

County Archaeologist: No objection subject to condition. Comments summarised as follows:

*"The application is supported by a desk based archaeological assessment prepared by CgMs Consulting that provides an overview of the archaeological potential...and concludes that the site has a low potential to contain archaeological remains, although as this conclusion is based on a lack of previous archaeological investigations within the area, the potential would be better described as uncertain.*

*Because of the uncertainty regarding the potential, the possibility that remains that may be associated with the nearby stone quarrying site may be present and the fact that the proposed construction and landscaping works will destroy any unknown or unexpected archaeological assets, I consider that in line with the National Planning Policy Framework*

*and Local Plan Policy Pc8, that there is a need for more detailed archaeological assessment.*

Environment Agency: No comments

Reigate Society: Objects on basis of harm to the Green Belt

Surrey Sustainable Drainage and Consenting Team: No objection subject to conditions

Surrey Police Crime Prevention Design Advisor: Recommends condition requiring scheme to be designed in accordance with Secured by Design principles

UK Power Networks: No objection

SES Water: No comments

### **Representations:**

Letters were sent to neighbouring properties on 29<sup>th</sup> August 2017. A Site Notice – opposite the site on Rockshaw Road – was posted on 15<sup>th</sup> September 2017. The application was advertised in local press on 5<sup>th</sup> October 2017.

100 responses have been received raising the following issues:

<b>Issue</b>	<b>Response</b>
Harm to Conservation Area	See paragraphs 6.26 to 6.35
Harm to Green Belt/countryside	See paragraphs 6.4 to 6.11 in respect of Green Belt, paragraphs 6.12 to 6.25 in respect of landscape and paragraphs 6.98 to 6.108 in respect of planning balance
Out of character with surrounding area	See paragraphs 6.12 to 6.25 in respect of landscape character and 6.26 to 6.35 in relation to built character
Overdevelopment	See paragraphs 6.26 to 6.35
Poor design	See paragraphs 6.26 to 6.35
Overbearing relationship	See paragraphs 6.36 to 6.38
Overlooking and loss of privacy	See paragraphs 6.36 to 6.38
Noise and disturbance	See paragraph 6.39
Inconvenience during construction	See paragraph 6.39
Inadequate parking	See paragraphs 6.46 to 6.49
Increase in traffic and congestion	See paragraphs 6.46 to 6.49
Hazard to highway safety	See paragraphs 6.42 to 6.45
Loss of/harm to trees	See paragraphs 6.50 to 6.54
Harm to wildlife habitat	See paragraphs 6.67 to 6.68

Drainage/sewage capacity	See paragraph 6.70
Flooding	See paragraph 6.70
No need for the development	See paragraphs 6.72 to 6.75 and 6.84 to 6.86
Alternative location/proposal preferred	See paragraphs 6.76 to 6.86
Loss of private view	Not a material planning consideration
Property devaluation	Not a material planning consideration
Conflict with a covenant	No specific covenant identified – legal issue and not a material planning consideration

## **1.0 Site and Character Appraisal**

- 1.1 The application site consists of two parcels of undeveloped greenfield land on the northern side of Rockshaw Road.
- 1.2 The westernmost area is situated between two residential properties – Dormers and Russetts – and extends to approximately 0.8ha. The site comprises natural, open land, and there are a large number of trees present on site. The easternmost area is situated between Brambly House and Sarum and similarly consists of open land with extensive tree cover, including some large mature and prominent specimens along the road frontage. There is evidence, in the form of desire paths, that both areas of land are used informally for recreation and walking.
- 1.3 Land levels across both sites fall away quite markedly from the Rockshaw Road frontage (i.e. from south to north) towards the M23 motorway.
- 1.4 Both sites are wholly within the Metropolitan Green Belt and within an Area of Great Landscape Value (AGLV). A significant proportion of the larger, eastern parcel of land is also within the Surrey Hills Area of Outstanding Natural Beauty (AONB). The site does not adjoin – and is some distance from – the nearest urban area.
- 1.5 The immediate locality is characterised by a small, semi-rural enclave of substantial residential properties in very large plots interspersed with areas of open land, woodland and countryside. Whilst the area is somewhat severed from the surroundings by the M23 and M25 motorways, it retains a semi-rural character and long-range landscape views across to countryside to the north of the M23 are possible. The North Downs Way public footpath runs to the east and rear of the eastern of the two site areas. Both parcels of land also adjoin the Rockshaw Road Conservation Area which covers properties on the southern side of the road, numerous of which are also locally listed buildings.
- 1.6 In total, the two sites amount to 4.57 hectares (west parcel – 0.8ha approx., east parcel – 3.8ha approx.).

## **2.0 Added Value**

- 2.1 Improvements secured at the pre-application stage: Pre-application advice relating to the redevelopment of the site was sought prior to submission. Advice was given in relation to the Green Belt and very special circumstances, landscape impact and accessibility, highways and parking.
- 2.2 Improvements secured during the course of the application: Improvements have not been sought as the application is considered to be unacceptable on a point of principle.
- 2.3 Further improvements to be secured through planning conditions or legal agreement: Improvements cannot be secured in this way as the application is to be refused. It is not considered that the issues identified – which are matters of principle which go to the heart of the proposals – could be addressed or mitigated adequately through conditions.

## **3.0 Relevant Planning and Enforcement History**

- 3.1 There is no planning history considered to be relevant to redevelopment of the site in the manner proposed.

### Environmental Impact Assessment (EIA)

- 3.2 The applicant submitted, alongside the application, a request for a Screening Opinion (17/02081/SCREEN) from the Council as to our views on whether the development proposed should be subject to EIA development. The Council issued its Screening Opinion to the applicant on 15<sup>th</sup> November 2017 which concluded that the development was EIA development for the following reason:

*The proposed development falls within Schedule 2 (10.B Urban Development Project of the EIA Regulations 2017. Whilst it does not meet the thresholds in Column 2 of Schedule 2, it is located partly within a "sensitive area" as defined in Regulation 2(1) (namely the Surrey Hills Area of Outstanding Natural Beauty). Having had regard to the 'selection criteria' in Schedule 3 of the Regulations, it is concluded that the project would be likely to give rise to significant effects on the environment, specifically in respect of landscape value and visual impact, which require further consideration. Accordingly, the Local Planning Authority is of the opinion that a statutory Environmental Impact Assessment is required for the proposed development.*

- 3.3 As the development was considered by the Council to be EIA development, the applicant was notified, in accordance with the EIA Regulations 2017, that an Environmental Statement (ES) would be required to accompany the application. The applicant confirmed on 29<sup>th</sup> November 2017 of their intention to provide such a statement and, as such, in accordance with the Regulations, the determination of the application was suspended.
- 3.4 Significant time elapsed between the applicant notifying of its intention to provide the ES and any further contact from them. The applicant was approached for an

update on a number of occasions but the ES was not forthcoming. In July 2018, the applicant was contacted again informing them that, due to the unsatisfactory delay, the application was to be reported to Committee in absence of the ES.

- 3.5 Despite previously confirming their intention to provide an ES, the applicant changed position, and on 23 July submitted a request to the Secretary of State for a Screening Direction, in effect challenging the Council's view that the proposal was EIA development. This was considered by the Secretary of State (through the Planning Casework Unit) and on 4<sup>th</sup> September 2018, the Ministry of Housing, Communities and Local Government confirmed that they did not agree with the Council's conclusions and their decision was that the development was not EIA development within the meaning of the EIA Regulations.
- 3.6 As a result of the Screening Direction, the development is not EIA development and thus an ES is not required for the development. It should be noted that the EIA process runs separate to, and does not prejudice, the Council's assessment or determination of the planning merits of the application.

#### **4.0 Proposal and Design Approach**

- 4.1 The proposed development seeks outline planning permission, with all matters reserved except access. The application proposes the erection of 4 detached dwellings and an extra care scheme of up to 85 units comprising apartments and cottages with associated communal facilities and all necessary internal roads, parking, open space and other ancillary works. The supporting Design & Access Statement indicates the following indicative mix:
- Extra care scheme – 54 x 2 bed apartments and 28 x 2 bed cottages
  - Residential dwellings – 4 x 5 bed houses
- 4.2 The application proposes four separate access points to Rockshaw Road for each of the individual dwellings with a single access point for the extra care scheme serving a main access road into the site.
- 4.3 The Design & Access Statement sets out a number of parameters for the development. In terms of land use, this illustrates that the extra care scheme would be on the western of the two land parcels included within the application boundary, with the eastern parcel and the eastern part of the western parcel intended for the private housing units. The illustrative layout suggests that the extra care scheme could be achieved through a series of 2.5 to 2.5 storey flatted blocks fronting onto Rockshaw Road with 1 to 2 storey cottages laid out in behind on the northern part of the site. Parking is indicated as being a combination of parking courts and on-plot parking for individual units. Parameters for the height and scale of the various building types proposed are also set out as follows:
- Apartment buildings
    - o Max: 26.5m depth (D), 31m width (W) and 15m height (H)
    - o Min: 22m (D), 24m (W) and 12.5m (H)
  - Semi-detached cottages
    - o Min/Max: 7.5m (D), 20m (W) and 7.5m (H)
  - Detached dwellings
    - o Max: 15.5m (D), 28.5m (W) and 10.5m (H)

- Min: 12m (D), 16m (W) and 9.5m (H)

- 4.4 “Character areas” are indicated within the Design & Access Statement. This is further developed with a separate “Design Concept” document which was provided late in the determination process and seeks to provide a clearer feel for the design principles (design approach, detailing and materials) which would be intended for each area. Matters of appearance are however reserved for future submissions.
- 4.5 A design and access statement should illustrate the process that has led to the development proposal, and justify the proposal in a structured way, by demonstrating the steps taken to appraise the context of the proposed development. It expects applicants to follow a four-stage design process comprising:  
Assessment;  
Involvement;  
Evaluation; and  
Design.
- 4.6 Evidence of the applicant’s design approach – as elucidated through the Planning Statement and Design & Access Statement - is set out below:

Assessment	The site sits within the Green Belt and partially within the Area of Great Landscape Value and Area of Outstanding Natural Beauty. There are currently no buildings on the site and the site itself is largely free of man-made features. The sites comprise a mix of meadow land and woodland. The site has a gradient across the site, dropping by approximately 10m across the site from south to north. The site is located close to the M23 and M25 motorway and there is an element of noise associated.
	The North Downs Way public right of way passes through the site on a north-south axis and will be maintained. There are numerous existing trees on site – trees unsuitable for retention will be removed and those of a high quality retained and protected.
Involvement	The application was supported by a Statement of Community Involvement. This confirms that pre-application consultation was carried out with the Council and the local community, the latter included a public exhibition at Merstham Village Hall. The statement summarises the main issues raised (chiefly Green Belt, AONB, impact on Conservation, parking and traffic/highway problems on Rockshaw Road). The statement sets out the changes made to the scheme in response to the consultation.
Evaluation	The Design & Access Statement details how the scheme has been informed by site specific constraints and the Statement of Community Involvement discusses how the layout and quantum of development has evolved in response to pre-

	application consultation. The applicant makes the case that there are no alternative sites for this form of development, hence why this development option is being pursued for the site.
Design	The applicant's Design & Access Statement indicates that the design and layout is considered to respond to the constraints of the site. Large villas (apartment block) are indicated along the Rockshaw Road frontage to respond to the scale and mass of existing properties. Retirement cottages would be sited to the rear and have been designed with lower mass to provide a more village aesthetic. The layout is suggested to respond to the topography of the site. Various "character areas" are proposed with different architectural styles and materials which are intended to reflect local vernacular.

4.7 Further details of the development are as follows:

Site area	4.57ha (west parcel 0.8ha approx., east parcel 3.8ha approx.)
Existing use	Open land (semi-natural grassland, scrub) and areas of woodland - greenfield
Proposed use	Residential (extra care and private dwellings)
Number of additional dwellings	Extra care – up to 85 Private dwellings – 4

## 5.0 Policy Context

### 5.1 Designation

Metropolitan Green Belt  
Area of Outstanding Natural Beauty (part)  
Area of Great Landscape Value  
Adjacent to Site of Archaeological Importance  
Adjacent to Rockshaw Road Conservation Area  
Adjacent to statutory and locally listed buildings  
Tree Preservation Order RE709

### 5.2 Reigate and Banstead Core Strategy

CS1(Presumption in favour of sustainable development)  
CS2 (Valued landscapes and the natural environment)  
CS3 (Green Belt)  
CS4 (Valued townscapes and historic environment)  
CS5 (Valued people/economic development),  
CS6 (Allocation of land for development)

CS10 (Sustainable development),  
CS11 (Sustainable construction),  
CS12 (Infrastructure delivery)  
CS13 (Housing delivery)  
CS14 (Housing needs of the community)  
CS15 (Affordable housing)  
CS17 (Travel options and accessibility)

### 5.3 Reigate & Banstead Borough Local Plan 2005

Landscape & Nature Conservation	Pc1, Pc2G, Pc4
Heritage	Pc8, Pc9, Pc10, Pc12, Pc13
Countryside	Co1
Housing	Ho3, Ho9, Ho10, Ho20, Ho23
Recreation	Re1
Movement	Mo4, Mo5, Mo6, Mo7, Mo12
Utilities	Ut4

### 5.4 Other Material Considerations

National Planning Policy Framework

National Planning Practice Guidance

Supplementary Planning  
Guidance

Local Distinctiveness Design Guide  
Developer Contributions SPD  
Affordable Housing SPD

Other

Human Rights Act 1998  
Community Infrastructure Levy Regulations 2010  
(as amended)  
Conservation of Habitats and Species Regulations  
2017  
Planning (Listed Buildings and Conservation  
Areas) Act 1990  
Town and Country Planning (Environmental Impact  
Assessment) Regulations 2017  
Countryside and Rights of Way Act 2000  
Public Sector Equality Duty  
Draft Rockshaw Road Conservation Area  
Appraisal  
Surrey Hills AONB Management Plan 2014-2019

## 6.0 **Assessment**

6.1 The application site comprises two parcels of undeveloped land within the Metropolitan Green Belt. The sites are also within the Area of Great Landscape Value and partially within the Surrey Hills Area of Outstanding Natural Beauty. The sites are divorced from the nearest urban area of Merstham.

6.2 The main issues to consider are therefore:

- development within the Metropolitan Green Belt
- landscape and visual impact and the effect on the AGLV and AONB
- design and impact on the character of the area
- impact on heritage assets, including the Rockshaw Road Conservation Area
- effects on the amenity of neighbouring properties
- accessibility, highways and transport implications
- trees and landscaping
- CIL and infrastructure contributions
- other matters
- very special circumstances

#### Development within the Metropolitan Green Belt

- 6.4 The application site is wholly within the Metropolitan Green Belt where the construction of new buildings is generally as inappropriate unless they fall within the specific exceptions set out in the National Planning Policy Framework (notably paragraphs 145 and 146).
- 6.5 This proposal, which would involve the erection of an extra care housing development, private residential dwellings, associated facilities and supporting infrastructure on a greenfield, undeveloped site within the Green Belt, would not fall within any of the exceptions in national policy. It is therefore concluded that the proposal would clearly represent inappropriate development which is, by definition, harmful to the Green Belt. This is not disputed by the applicant.
- 6.6 In addition to the definitional harm by reason of inappropriateness, the proposal is considered to give rise to other identifiable harm to the Green Belt.
- 6.7 Firstly, the Framework clearly sets out that fundamental aim of Green Belt policy is to prevent urban sprawl by “*keeping land permanently open*” and that one of the essential characteristic of the Green Belt is its openness. It is well-established through case law that land which is “open” is that which is free from buildings and other built development and that the loss of openness can, in and of itself, be harmful to the underlying policy principle. The application sites, in their present form, epitomise this characteristic in that they comprise undeveloped land of natural, semi-rural character and is entirely free from buildings, built form or other forms of urbanising development.
- 6.8 By contrast, the proposal – whilst in outline – would introduce a significant quantum of built form – in the form of buildings, hardstanding and other urbanising features - onto the site. Based on the size parameters suggested in the Design & Access Statement, the cumulative footprint and volume of built form would be significant. This built form, by its very existence, would clearly erode the openness of the Green Belt and therefore undermine one of the essential characteristics identified in national policy. These physical changes, coupled with the consequent activity and paraphernalia which would be associated with a residential/extra care use, would also represent an encroachment into the countryside.

- 6.9 This erosion of openness and encroachment into countryside would be readily apparent and clearly perceived by those using public routes and vantage points. Recent case law has confirmed that visual impact can be a relevant factor which the decision maker can take into account in determining impact on openness. From Rockshaw Road (as confirmed by the applicants own Landscape and Visual Impact Assessment) the erosion of openness would be highly conspicuous with the introduction of buildings along the frontage. Furthermore, whilst the application is in outline, based on the quantum of development, it is very likely that this built form would be dispersed across the site (the illustrative layout supports this view), extending onto the northern parts of the site unlike development along Rockshaw Road which is – for the most part – confined to the road frontage. Consequently, the erosion of openness and encroachment into the countryside would be appreciable from the adjoining North Downs Way at close range, as well as from longer range vantage points across the M23 (both of which are again acknowledged in the applicant's Landscape and Visual Impact Assessment). These visual factors are considered to support the conclusion that openness would be evidently and substantially eroded in this case. Furthermore, when viewed from Rockshaw Road, the application sites read and are appreciated as part of the much wider countryside network given the visual relationship to the North Downs beyond; this is in spite of the intervening infrastructure of the M23 which is generally well screened and not overly intrusive or disruptive due to the topography.
- 6.10 In addition, the sites, at present, clearly support a degree of established, albeit informal, recreation and amenity (walking, cycling, dog walking and the like), as evidenced by the natural "desire paths" which have been trodden into the grassland on the site over time. The sites could therefore be considered to perform one of the "beneficial uses" identified in paragraph 141 of the Framework. Whilst the illustrative plans indicate some footpaths would be retained though the site, it is inevitable that there would be a reduction and restriction in free, informal access to the site. It is considered that this would add to the perception that the "countryside" has been encroached into.
- 6.11 It is therefore concluded that the proposal would be inappropriate development in the Green Belt which is by definition harmful. The proposal would also give rise to significant harm by way of erosion of openness and a demonstrable and appreciable encroachment into the countryside. The harm to the Green Belt would therefore, in totality, be very significant. In accordance with national policy (paragraph 144), this harm should be afforded substantial weight in the overall planning balance.

Landscape and visual impact and the effect on the AGLV and AONB

- 6.12 The two parcels of land which comprise the application site are both situated wholly within the Area of Great Landscape Value as designated in the Borough Local Plan 2005. Furthermore, approximately two-thirds of the eastern side of the eastern parcel is within the Surrey Hills Area of Outstanding Natural Beauty.
- 6.13 In this context, paragraphs 170-172 of the Framework are particularly relevant. Paragraph 170 seeks to ensure that the planning system contributes to and enhances the natural and local environment by, amongst other things, "*protecting*

*and enhancing valued landscapes...in a manner commensurate with their statutory status or identified quality in the development plan*" whilst paragraph 172 specifically deals with the weight and approach which should be taken to developments in Areas of Outstanding Natural Beauty. Policies Pc1 of the Local Plan 2005 and Policy CS2 of the Core Strategy are also relevant, the former of which specifically sets out that the Council will protect the AONB and AGLV from inappropriate development and that "major proposals for development within these areas would normally be inconsistent with these designations".

- 6.14 The proposal was accompanied by a Landscape and Visual Impact Assessment which concluded that two viewpoints would experience significant visual effects, which would remain even with mitigation measures. From remaining receptors (15 different viewpoints), it concludes that "views of the development will remain largely unchanged" and that "when this development is assessed in context with the wider landscape, the visual impact would be reduced, visually blending in with the surrounding suburban landscape".
- 6.15 The conclusions in relation to visual impacts in the applicants LVIA are broadly agreed. In particular, this acknowledges that there would be lasting major/moderate visual effects on residents/users of Rockshaw Road and North Downs Way (which are considered high sensitivity receptors). As the LVIA notes, *"from nearby views, the site would remain noticeable with little visual barrier effect from either mitigation planting or its juxtaposition with other residential development"*.
- 6.16 The report identifies only a minor visual impact on the North Downs Way as it emerges under the M23; however, whilst it is noted that there is some interceding vegetation which would screen views, this screening would only be effective when in full/partial leaf and given the scale of change, rising land and potential for reduced screening in winter, it is considered that there would be a material visual impact along the full extent of the North Downs Way between Rockshaw Road and the M23. The Surrey Hills AONB Officer particularly notes that:
- "The long distance North Downs Way runs along the eastern boundary of the main site and a little north before passing under the M23 motorway and then rising up the North Downs. The North Downs Way the runs along Rockshaw Road. The length of the North Downs Way has a country feel to it, consistent with the countryside to the north that walkers will have passed or would be about to pass if walking east. However, the character of this long distance path would change significantly and adversely between near the subway and along Rockshaw Road to one of passing through a more suburban area. This would clearly not be in the public interest"*.
- 6.17 The report also identifies moderate and minor impacts to longer range receptors on higher ground to the north of the M23 (including two footpaths which traverse the agricultural land).
- 6.18 In terms of landscape character, the report concludes the area has medium sensitivity to residential development and that the proposal would have a minor effect during construction. At operational stage, the LVIA (para 13.4) concludes that there would be a "minor loss of key landscape elements and the introduction of elements that may be prominent but not uncharacteristic will occur and the

subsequent landscape effects are not considered to be significant in planning terms". It also concludes that the proposed development would have minor residual effects once buffer planting has established.

- 6.19 The Surrey Hills AONB Officer has reviewed the application and associated LVIA. Specifically, he considers that the two sites make a major contribution to the landscape character of Rockshaw Road. In particular, his response notes that

*"when approaching Rockshaw Road from the west over the bridge, one moves from a more busy urban area into a clearly quieter more landscape dominated area even though houses front the southern length of the road and partly along the northern length where the development is proposed. Most of the houses are substantial and fairly widely space in mostly generous curtilages with extensive vegetation".*

- 6.20 This analysis and conclusion from the AONB Officer is agreed. Whilst it is noted that Rockshaw Road sits between the M23 and M25 motorways, the landscape character of the area is very distinct from the main urban settlement of Merstham to the south, and the overall impression of the site and its surroundings is semi-rural. The 2015 Landscape Character Assessment specifically identifies the need to "retain the character of individual settlements" within the character area within which these sites sit (the Greensand Valley area) by "...avoiding dense linear development along these roads". The LCA also advises the need to conserve rural roads and avoid their urbanisation. It is considered that the proposal would fail to achieve these aims and, in doing so, would cause some harm to the landscape character.
- 6.21 Furthermore, long range views towards the North Downs – which are identified in the 2015 Surrey Landscape Character Assessment (by Hankinson Duckett Associates) as a key positive attribute of this area – are presently possible from within the southern parts of the site and along this part of Rockshaw Road within the AONB; however, these would be materially and detrimentally interrupted by the proposed development. The Surrey Hills AONB Management Plan 2014-2019 – which is considered to be a material consideration - specifically identifies (Aim LU2) that development will respect the special landscape character of the locality, including – amongst other things – by giving particular attention to potential impacts on public views. It also sets out (Aim LU5) that development that would spoil the setting of the AONB by harming views into or from the AONB will be resisted. For the above reasons, it is considered that the proposed development would fail to support these aims of the AONB Management Plan.
- 6.22 The effects of residential development and the associated infrastructure on the local landscape character of the AONB and AGLV in this area would be permanent and irreversible. For this reason and cognisant of the above points, it is concluded that the proposed development would have an adverse impact on landscape character at a localised scale and would thus fail to conserve the landscape and scenic beauty of the AONB. It would also erode the character of the locally designated AGLV, both as a landscape area in its own right and as a buffer to/the setting of the AONB. The conclusions of the AONB Officer in his response to the application, set out as follows, are agreed:

*"I consider that the proposed development would fundamentally change the character of the locality from a landscape dominated area justifying inclusion in the national AONB landscape designation with the highest level of protection it enjoys and the associated more local AGLV designation, to a suburban character where buildings would have a significantly greater visual impact such as to dominate the landscape. The change would be so significant that the area might not be worthy of continued AONB designation."*

- 6.23 The proposal would therefore give rise to conflict with Borough Local Plan Policy Pc1 and the similar provisions of Policy CS2 of the Core Strategy.
- 6.24 In the context of the NPPF, it is also necessary to address the question of whether the proposals represent major development within the AONB. The latest Framework (supported by relevant case law) confirms that this is a matter for the decision taker, taking into account the proposal in question and the local context. Whilst it is recognised that not all of the development proposed would be in the AONB, based on the nature of the site (and supported by the illustrative layout and parameters submitted with the application), it is likely that the vast majority of the more intensive development associated with the extra care element of the scheme would be located within the AONB. Taking account of the low density, semi-rural nature of the residential ribbon development along Rockshaw Road (which – even including the denser enclaves at Ashcombe Road and to the east of the site – only includes around 80 existing dwellings), the comparative number and intensity of development proposed in this case would clearly be very significant in the context. Furthermore, the Framework advises of the need to take account of whether it could have a significant adverse impact on the purposes for which the area is designated. Whilst the conclusions of the MHCLG Planning Casework Unit in respect of the need for an EIA are noted, given the discussion above, the views of the AONB Officer and the conclusions of the applicant's own LVIA that the development would result in the *"loss of key landscape elements"*, it is considered that the development could be viewed as major development for the purposes of paragraph 172 of the Framework. This is consistent with the applicant's own admission (at paragraph 5.104 of their Planning Statement) which definitively states that *"obviously, the proposals for the retirement scheme meet the definition of major development"*.
- 6.25 In light of this conclusion, the development must also be considered against the specific tests in paragraph 172 of the Framework. These specific tests are also addressed further in the overall planning balance below.

Design and impact on heritage assets, including the Rockshaw Road Conservation Area

- 6.26 The application was supported by a built heritage assessment. This acknowledges that the sites are situated adjacent to the Rockshaw Road Conservation Area (which for the purposes of national policy, this constitutes a designated heritage asset) and that there are two Grade II listed buildings in proximity of the sites (Noddyshall and Little Shaw) (which are again designated heritage assets) and a wide variety of locally listed buildings (which are non-designated heritage assets). Whilst recognising these assets, the assessment concludes – in short – that,

subject to appropriate design, layout and landscaping, the scheme would preserve the significance of nearby heritage assets.

- 6.27 Whilst attractive open natural green spaces, this characteristic alone is not considered by the Conservation Officer or identified within the draft Conservation Area Appraisal for Rockshaw Road as making a particular or intrinsic contribution to the setting or overall heritage significance of adjoining and nearby heritage assets. As such, from a heritage perspective, the loss of these open areas is not considered to give rise to an in principle harm.
- 6.28 Consideration therefore needs to be given to detailed layout and design. As the application is made in outline, with all matters except access reserved, there is limited detail at this stage on the layout, appearance and scale of the scheme. However, as above, some illustrative plans have been submitted and the Design & Access Statement sets out some design parameters and character areas which the scheme would be intending to follow.
- 6.29 In terms of the Conservation Area, the draft Conservation Area Appraisal for Rockshaw Road identifies that its prevailing character is that of a cohesive group of arts and crafts houses, mostly by Paxton Watson, set within spacious plots and with space between the houses. The illustrative layout suggests that the frontage along Rockshaw Road would be predominantly occupied single larger buildings (either as detached private dwellings or apartment blocks) set within large plots. Such an approach would therefore follow and preserve the pattern and grain of development along the adjacent Rockshaw Road Conservation Area.
- 6.30 The illustrative layout suggests that smaller cottages would be laid out to the rear of these frontage buildings, organised around a single main access road. Whilst this form of development would not be typical to the adjacent Conservation Area, these elements of any scheme would likely be less prominent in the Rockshaw Road street scene such that they would not appear as disruptive to its character or setting.
- 6.31 The original D&A Statement alludes to these having a more contemporary design for the “cottages” on the northern parts of the site; however, the later Design Principles document shows more traditional design intent. Mindful of the advice in the Framework with respect to not stifling innovation, originality or initiative, it is considered that – subject to the detail and materiality, an acceptable design, reflecting local distinctiveness could likely be achieved through either route at reserved matters stage.
- 6.32 All of the locally listed buildings which adjoin the two parts of the application site are on the opposite side of Rockshaw Road. Whilst these buildings are experienced and viewed in a semi-rural context along Rockshaw Road, it is considered that this could be adequately maintained through appropriate design, layout and landscaping and that therefore, the proposals would not give rise to harm to their setting.
- 6.33 In terms of the statutory listed buildings, Noddyshall Cottage, which is Grade II listed, is significantly set back from the road behind dense boundary planting. The application site is visually divorced from this asset and is not considered to make

any particular contribution to its setting. Likewise, the positioning of Little Shaw is such that its relationship to the application site in terms of setting and significance is peripheral at best.

- 6.34 In terms of issues of wider character, the proposals incorporate – as set out within the Transport Assessment – a traffic calming scheme on Rockshaw Road incorporating build outs to narrow the highway, large raised tables (including at the proposed junction to the extra care element of the scheme and entry features. These alterations would be urban in appearance and out of character with the semi-rural lane feel of Rockshaw Road and would fail to “*conserve rural roads and avoid their urbanisation*” as the Landscape Character Assessment advises for this area. In their response to the application, the County Highway Authority similarly identifies that the works would be out of keeping with the character of Rockshaw Road and questions whether such extensive measures are even necessary. On this basis, a more sympathetic package of highway safety measures would be required.
- 6.35 In conclusion, taking the above into account, and acknowledging the parameters indicated on the various illustrative plans and supporting design documents, it is considered that a scheme of a layout, scale, design and appearance appropriate to the surrounding built character. Subject to appropriate design/layout, adverse impacts on the significance of heritage assets are unlikely but would at most be less than significant. On this basis, a scheme compliant with relevant design and heritage policies could be achieved, subject to a revised scheme for traffic calming/highway safety measures.

#### Effects on the amenity of neighbouring properties

- 6.36 As the application is made in outline, with layout and scale reserved, the exact location and scale of individual buildings and other features within the site is not confirmed at this stage.
- 6.37 However, given the space available in the areas defined for development and, when considering the illustrative layout, an acceptable relationship could be achieved. In respect of side-to-side relationships with existing properties on the northern side of Rockshaw Road, adequate spacing could be retained between the properties to ensure there would not be an adverse overshadowing or overbearing effect, even acknowledging the larger bulk and depth of the indicated apartment blocks. For example, to the single storey dwelling “Sarum” which adjoins the main site to the east, the illustrative plan shows a separation distance of c.12m, aided by the intervening North Downs Way. Development on the rear (northern) portion of the main site would be capable of retaining substantial separation distances to adjoining or frontage development on Rockshaw Road and would likely be set at a lower level due to the drop in land levels. With this type of relationship, it is not considered that there would be an adverse impact on neighbours in terms of overbearing or overlooking.
- 6.38 Concerns have also been raised by occupants of dwellings on the southern side of Rockshaw Road. Whilst it is noted that the apartment blocks which are anticipated to front Rockshaw Road would be of reasonable scale, separation distances of c.30m+ front to front would likely be achievable, thus any harmful overlooking or

overbearing effects could be avoided. Whilst it is appreciated that some properties on this side of Rockshaw Road may lose the benefit of pleasant long range views across the North Downs, loss of a private view is not a material planning consideration and overall, they would maintain a more than adequate outlook and level of amenity.

- 6.39 Noise and disturbance resulting from the development when completed would likely be acceptable and accord with normal residential environments. Whilst nearby residents' concerns regarding potential adverse noise, nuisance or disturbance resulting from construction are appreciated (particularly given the likely length of construction), such effects would be temporary and not sufficient to warrant refusal given the existence of other legislation (e.g. statutory nuisance) to control these issues. In the event that the application were to be approved, a robust Construction Management condition could be imposed to manage amenity and highway impacts of the construction process.
- 6.40 On this basis, it is considered that the proposal, through its reserved matters, could be designed to achieve an acceptable relationship to neighbouring properties and that there are no in principle objections on neighbour amenity grounds. It therefore complies with policies Ho9 and Ho20 of the Borough Local Plan 2005 in this specific respect.

Accessibility, parking and highway implications

- 6.41 The application was accompanied by a Transport Statement which assesses the likely transport and highways implications of the development and makes a number of recommendations as to highway works and travel measures to mitigate the impacts of the development.
- 6.42 The proposals and supporting material have been reviewed in detail by the County Highway Authority (CHA) who have recommended refusal of the application. This is in part on the basis that, whilst the application is in outline, insufficient or inadequate evidence has been provided to robustly demonstrate the likely highways implications of the development. These issues are discussed further below.
- 6.43 In terms of vehicular access, the submitted drawings propose that the main extra care housing site would be accessed by a single point from Rockshaw Road, serving a new access road. The illustrative plans suggest that the private residential dwellings would each have independent crossovers from Rockshaw Road. The Transport Assessment demonstrates that visibility splays of 2.4m x 160m are achievable at each of the access point which the CHA considers are appropriate for the speed of traffic along this road.
- 6.44 As above, also included within the application (set out in the Transport Assessment) are a series of traffic calming and highway works along Rockshaw Road, including narrowing features, raised tables and entry features. These measures have been considered by the CHA who recommend that they are unacceptable on highway safety grounds and would otherwise be inappropriate in terms of their impact on the character of Rockshaw Road and the nature of the scheme. Given the conclusions above regarding visibility at the access, the CHA recommend that the extensive

traffic calming measures proposed are technically not required and could lead to more harm than good on the highway network. They therefore recommend that these measures are excluded from the scheme.

- 6.45 In terms of pedestrian access, the CHA response identifies this as a key concern, particularly given the limited pedestrian facilities, non-continuous footways, high speed of traffic along Rockshaw Road and the likely elderly age of residents. To resolve this, the CHA recommends a series of safe pedestrian crossing points along Rockshaw Road (with associated refuge islands) as a more appropriate solution in the circumstances together with the provision of a continuous footway along the frontage of the site. The introduction of refuge islands with associated hatched markings could also give the visual effect of carriageway narrowing and would be a more appropriate traffic calming measures than those presently proposed.
- 6.46 The site is located north of Merstham in what is considered to be a relatively inaccessible location. The nearest facilities are within Merstham Village which is over 1km from the site (not as the crow flies) and provides only a limited selection of shops and services, albeit there is a Co-op convenience store on the Merstham estate which is approximately 2km from the site. The nearest bus stops are on the A23, some 800m walk from the centre point of the main application site. As the CHA response notes, *“these distances exceed the recommended maximum walking distance to a bus stop of 400m”*. Whilst the intention to provide on-site services and facilities is noted, these would be relatively limited and could not be said to be fully self-sustaining in terms of the likely day to day needs of future residents, particularly given the applicant’s state that one of the key intentions of extra care provision such as this is *“allowing people to retain independence for as long as possible”*. Taking these factors into account, the site is not considered to be accessibly or optimally located for the purposes of Policy CS14 of the Core Strategy or policy Ho21 of the Local Plan.
- 6.47 Given the location of the site, there is therefore a risk of significant car reliance given the distance to nearby services. In an attempt to mitigate this issue, the applicant has indicated, through their Transport Statement, an intention to provide a dedicated minibus service for residents. The response of the CHA to the application highlights the fact that, in their view, this would likely be a critical measure in enabling sustainable travel to the site; however, inadequate detail has been provided by the applicant and they pose a number of questions regarding the operation, frequency, routing and long-term funding of the service. These questions remain unanswered and, as such, it cannot be said with confidence that this mitigation would be at all effective in reducing excessive reliance on private car journeys which is inevitable due to the more remote location of the site. It is questionable at any rate whether reliance on such a bus service genuinely promotes the type of independence which the proposal is otherwise seeking to engender.
- 6.48 It is noted that a number of representations raise concerns regarding the potential increase in traffic arising from the development; including specific impacts on queuing at the width restricted railway bridge section of Rockshaw Road. In this respect, the County Highway Authority has also raised concerns in their response regarding the evidence underpinning the trip generation assumptions within the

Transport Assessment. In particular, they highlight uncertainty regarding the likely mix of units proposed and the level of care which they will need as these factors will have a significant influence on the trip generation associated with the site (i.e. those with more significant care needs are likely to have a lower level of independence and freedom than a resident with limited care needs who owns a car). Furthermore, whilst existing operational Retirement Villages sites have been relied upon, there is little evidence to demonstrate that these are comparable in terms of location and accessibility. In absence of this clarification, the transport impacts of the development cannot be properly and robustly appraised and cannot be concluded to be acceptable.

- 6.49 A number of improvements to the draft Travel Plan submitted by the applicant, which presently focusses on staff travel with little consideration of residents, have also been requested by the CHA.
- 6.50 In view of the above, it is considered that the site is not in an accessible location and insufficient evidence has been provided by the applicant to enable a robust assessment of the transport impacts of the proposals and the effectiveness of proposed sustainable travel measures. Furthermore, the currently proposed traffic calming measures would, in the CHAs view, be likely to give rise to conditions prejudicial to, rather than beneficial to, highway safety. Taking this into account, the proposals are contrary to policy Ho21, Mo4 and Mo5 of the Local Plan, Policies CS14 and CS17 of the Core Strategy and the provisions of the Framework in respect of promoting sustainable transport.

#### Trees and landscaping

- 6.51 As above, the two parcels of land are presently open, undeveloped countryside. The smaller parcel of land (situated between Dormers and Russetts) has relatively significant tree cover; however, much of it is smaller, self-sown trees with some larger mature specimens along the eastern and western boundaries. There is a belt of trees running north-south through the middle of the eastern parcel, as well as further trees lining the frontage of the site with Rockshaw Road.
- 6.52 The application was supported by a Tree Survey and Constraint Advice Report (by ACD Environmental) as well as an Arboricultural Impact Assessment and Method Statement. On the smaller western parcel, the AIA indicates that a large number of predominantly lower Grade U or C trees would be removed to facilitate the proposed private dwellings and their gardens to the rear. The larger mature trees on the boundaries would be retained and protected. On the larger parcel, most trees would be retained however; a small section of the central group of trees (Grade B2) would be removed, as would some lower grade specimens within this area and on the frontage with Rockshaw Road.
- 6.53 The Tree Officer was consulted on the application and has reviewed the information submitted, including the various arboricultural reports supporting the application. The Tree Officer advises that most of the trees lost are low quality self-sown scrub trees and, whilst there are some higher grade trees as part of the group on the western parcel which would be removed, this would not have a significant impact on the character or visual amenity of the area or the Conservation Area. Consequently,

the Tree Officer's advice is that the tree losses identified would not be a sustainable reason for refusal.

- 6.54 Given the size and nature of the site, and recognising that the application is in outline, the Tree Officer advises that there would likely be adequate opportunity for replacement and additional tree planting and a meaningful landscaping scheme to be achieved.
- 6.55 Accordingly, subject to conditions requiring a detailed landscaping scheme (as reserved matters) and implementation of the tree protection measures identified, the proposal would not have an undue impact on the arboricultural interest of the site and would comply with policies Pc4 and Ho9 of the Borough Local Plan 2005 in this specific respect.

Community Infrastructure Levy (CIL), planning obligations and affordable housing

- 6.56 The development proposes an extra care housing scheme of 85 units and four private residential units.
- 6.57 The four private residential units indisputably fall within a C3 use and thus within the scope of the Council's requirements for affordable housing contributions (Policy CS15 and the Affordable Housing SPD). Being part of a larger scheme, it is not considered that the C3 units fall within the ambit or spirit of the Government's exemption for small sites (as introduced through the Written Ministerial Statement and Planning Practice Guidance).
- 6.58 The Affordable Housing SPD relies upon floorspace as the metric to calculate affordable housing contributions. Due to the outline nature of the application, the applicant has agreed to a cap on the gross internal floor area of the private dwellings of 1,700 square metres. This cap would be enshrined in a planning condition in the event the application were approved and would provide a basis on which to calculate the contributions which would then be secured through a legal agreement. Based on this figure, the affordable housing contributions due on those four units would be approximately £134,300 (subject to indexation). However, as a completed legal agreement is not in place, the absence of this contribution will form a further technical reason for refusal.
- 6.59 The four private dwellings (being C3 use) would also be liable for CIL contributions which would be calculated (with appropriate indexation) following the grant of any associated reserved matters application.
- 6.60 In terms of the extra care scheme, the applicant argues that this would fall within C2 use. To support this case and position, the applicant has provided a number of appeal decisions and legal opinion from Counsel.
- 6.61 Officers have considered the various information, appeal decisions and legal cases on this issue. Whilst these sources confirm that a view needs to be taken on a case by case basis, they indicate that the key considerations in determining whether a development constitutes a C2 or C3 use class will be the extent and nature of restrictions on occupancy and the extent to which the provision of, and need for,

care is an integral part of the development and essential criteria for occupancy. Of particular note, and often cited as a leading case on this matter, is the case of *Leelamb Homes Ltd v Secretary of State and Maldon District Council* in which the judge held that a legal agreement securing a minimum care package of 2 hours per week was a material consideration and sufficient to constitute a C2 use. Other appeal decisions have subsequently followed the broad thrust of this decision.

- 6.62 Whilst some of the proposed extra care units would have the attributes of a separate dwelling, it is necessary to examine the nature, use and characteristics of the scheme as a whole. In this case, whilst the scheme is in outline, the Design Statement, Development Principles document and other documents submitted with the application (such as illustrative layouts) illustrate an intention for care to be an integral part of the ethos, configuration and design of the scheme. The Planning Statement (paragraph 4.3) sets out that the units would all be designed to meet higher Building Regulations standards for accessibility (specifically Part M Category 3, i.e. accessible or adaptable for wheelchair users) and this could be secured through condition, with other adaptations to support those who may have specific care requirements or disabilities. The scheme is also proposed to have a wide range of communal facilities including lounges, on-site therapy rooms, etc. which the proposed draft Heads of Terms would ensure are available to future residents (subject to payment of service charges, etc.). In terms of design and layout intentions and mix and configuration of likely on-site uses, it is concluded that the provision of care would pervade the whole development in a physical sense.
- 6.63 In addition, and reflecting the position in the Leelamb case which has been supported and other subsequent appeals, the applicant proposes draft heads of terms for a legal agreement which would control future occupation of the extra care units to only those residents over a certain age and who require, and sign up to, a basic care package at first occupation. It would ensure that occupants of the scheme are either currently, or imminently have a need for care. Whilst this is yet to be finalised and agreed, in principle, this approach would reinforce the fact that care would be an integral part of why residents would choose to live on the scheme.
- 6.64 Taking all of the above characteristics into account, and subject to appropriate conditions and a legal agreement regarding the occupational restrictions and care requirements, it is concluded that the extra care element of the scheme would fall within Use Class C2 and thus there would be no policy basis for requiring affordable housing provision (or contributions) on this element of the scheme. This does not however negate the conclusions above regarding the proposed private market dwellings.
- 6.65 At this stage, a completed legal agreement has not been received. As the application is recommended to be refused, further technical reasons for refusal are therefore proposed relating to the absence of an agreed affordable housing contribution for the private market units and appropriate restrictions, requirements and obligations for the extra care units. These would not be pursued further if an acceptable agreement was forthcoming prior to any appeal.
- 6.66 Community Infrastructure Levy (CIL) Regulations were introduced in April 2010 which states that it is unlawful to take a planning obligation into account unless its

requirements are (i) relevant to planning; (ii) necessary to make the proposed development acceptable in planning terms; and (iii) directly related to the proposed development. As such only contributions, works or other obligations that are directly required as a consequence of development can be requested and such requests must be fully justified with evidence including costed spending plans to demonstrate what the money requested would be spent on.

- 6.67 No such contributions or requirements have been requested at this stage. However, as above, there are presently unresolved highway objections to the scheme and, as such, it is possible that works relating to addressing and overcoming these highway impacts may be required to be secured through a legal agreement.

#### Other matters

- 6.68 The site is not subject to any specific nature conservation designations; but, as a large open, semi-natural site, has the potential to support biodiversity and ecology. The application was initially supported by various partial reports and surveys of the ecology of the site which were subsumed into a Final Ecological Impact Assessment which was submitted later in the determination process. The surveys carried out for the various species are considered to be robust and consistent with best practice guidance.
- 6.69 The ecological surveys identified the presence of a number of protected species on site including bats, badgers, slow worm, common lizard and roman snails. For the most part, the Ecological Assessment concludes that – with appropriate mitigation measures – the impact on species would be neutral. However, in respect of reptiles (slow worm and common lizard) the study identifies a non-significant negative impact and identifies that translocation would be required to the adjoining retained natural corridor within the ownership of the applicant. No specific conclusion is reached in the study in respect of the roman snail population on site; however, again the ecological assessment identifies that translocation to the adjoining natural corridor (which would be appropriately improved) would again be required. Based on the information provided, it is considered that subject to adoption and implementation of the measures recommended in the Ecological Assessment as well as more detailed proposals for the works to be carried out on the retained natural corridor, that any impacts on biodiversity or protected species could be adequately mitigated or compensated. On this basis, it is considered that the proposal could be designed to comply with local policies Pc2G (Local Plan 2005) and CS10 (Core Strategy), relevant national policies and relevant legislation. It should be noted that Natural England was consulted on the application and raised no objection in respect of the effect on designated sites (i.e. the Special Area of Conservation).
- 6.70 The application was accompanied by a Desk Based Archaeological Assessment which is required due to both its size (over 0.4ha) and the presence of a designated Area of High Archaeological Importance (Chaldon Firestone quarries). The study concludes that the site has low archaeological potential for all past periods of human activity. The County Archaeological Officer has reviewed the application and considers that due to the absence of previous investigations, the potential of the site

is uncertain and thus more detailed archaeological assessment is required which could be secured by condition.

- 6.71 The site is within Flood Zone 1 and is not identified as being at particularly high or widespread risk of surface water flooding according to Environment Agency modelling. The Environment Agency was consulted on the application but given these characteristics responded to confirm that it would not be providing bespoke comments. The application was supported by an initial drainage strategy document which has been reviewed by Surrey County Council as the Lead Local Flood Authority who has raised no objection to the development subject to conditions to secure a finalised detailed drainage strategy in due course. On this basis, it is considered that the scheme could be designed to meet the requirements of policy Ut4 of the Local Plan, CS10 of the Core Strategy and the relevant provisions of national policy in respect of flooding and drainage.
- 6.72 A Geo-environmental desk study was submitted with the application. This has been reviewed by the Council's Contaminated Land Officer who considers that, due to the potential for localised contamination from historic abandoned pit workings as well as potential ground gas migration from a nearby historic landfill, numerous conditions to secure further investigation, remediation and mitigation are necessary to ensure there would be no adverse impact on human health.

#### Benefits and considerations in favour of the scheme

##### *Need*

- 6.73 The proposed development is intended to provide an extra care housing scheme, alongside four private detached dwellings. It is suggested that the care element would provide a care facility with 24 hour care for the frail elderly and will help to improve the overall quantity and quality of care services in the area for older people (particularly those with dementia).
- 6.74 The application was supported by several reviews of the need for extra care housing in the borough and surrounding areas, including a report by Contact Consulting (July 2017) which the Planning Statement identifies as the most up to date analysis. This review identifies a shortfall in extra care accommodation in the borough and a requirement for an additional 324 units as of 2017. On this basis, it concludes that there is a "*paucity of provision for older home owners within Reigate and Banstead*".
- 6.75 The scale of need identified in the applicant's submission is significantly higher than that identified in the Council's latest evidence to support the DMP (which identifies a need for 80 units if current levels of extra care provision are maintained). Even if extra care provision was significantly increased over the period to 2027 (to 25 units per 1,000 people over the age of 75 which is consistent with the level used in the evidence supporting the previous DMP consultation), somewhere around 275 additional extra care units would be required to meet requirements in full. The applicant's assessment of need is also significantly greater than the delivery target recommended in Surrey CC's latest draft Integrated Commissioning Statement for Accommodation with Care and Support in the East Surrey CCG Area (the CCG

area within which this site falls), which seeks an additional 120 units between 2015 and 2025. It should also be noted that SCC's Statement identifies that Reigate & Banstead has one of the highest ratios of extra care housing per 1,000 over 75s in the whole of Surrey (13 compared to an average of 7 across the County).

- 6.76 It is however appreciated that there is a growing move towards extra care housing. Surrey County Council's latest *Accommodation with Care & Support Strategy* identifies "*a declining demand for residential care, a growing popularity of Extra Care housing and an increase in people being supported to live independently*" and promotes maximising opportunities to deliver this type of accommodation.

*Lack of alternative sites/alternative options for meeting need*

- 6.77 The applicant's also argue that there are no alternative sites (supported by a "sequential site search") which could accommodate the identified need and that the Council's intended approach to meeting needs in the emerging Development Management Plan is flawed (as set out in the Planning Statement). This is consistent with representations which the applicant made to the last round of the DMP consultation.
- 6.78 Whilst the applicant's position and sequential test is acknowledged, it is not agreed that it is definitive in confirming that the identified need could not be met on alternative sites or that the Council's proposed strategy for future delivery would be ineffective.
- 6.79 The Sequential Test excludes all sites under 3.5ha on the basis that they would not be able to deliver an equivalent development. The applicant's justify this approach by reference to an appeal decision in Handforth where the Inspector considered the issue of needs being met on a disaggregated basis and concluded that "*the inclusion of smaller sites from the separation of these two elements of the proposal would not outweigh the benefits from the combined proposal on safeguarded land*". Whilst this appeal decision is acknowledged, it is not considered to justify the same approach in every circumstance – as can be seen from the quote above – it reflects a balancing exercise considering whether the extra over benefits which might accrue from a concentrated "retirement village" scheme as compared to meeting the needs in another way would outweigh the identified harm. In this case, given the site is within the Green Belt (not safeguarded land) where a higher test exists in the balancing exercise, it is not agreed that disaggregation should be disregarded.
- 6.80 Members will be aware that the emerging Development Management Plan identifies a number of potential site allocations (including sites within the urban area) upon which specialist older persons housing would be expected to be delivered. As above, this specifically includes the Colebrook site just outside of Redhill Town Centre and within the urban area which is understood as being actively being considered by the landowner (Surrey County Council) for extra care development and which would be potentially capable of delivery in the short term (the site is allocated in the DMP for 110 residential units in total and it is understood that the County Council is exploring a scheme which would delivery up to 45 units of extra care).

- 6.81 Over the longer term, further delivery of specialist older persons housing is also proposed through the emerging DMP on the sustainable urban extensions (SUEs). Three SUE allocations within the DMP include a specified requirement for specialist older persons housing and, given the size of the allocations and “critical mass” required for a viable extra care proposal, it is realistic that at least two of these (ERM2/3 and SSW2 - delivering 118 units) could be provided as extra care housing. These sites are considered to be in more sustainable locations than the application site and in which extra care could be delivered as part of a mixed community.
- 6.82 There are therefore considered to be sites and emerging allocation, both in the short and longer term, which could meet potential needs. It should be noted that potential delivery from the sites discussed above could exceed the 120 units which Surrey CC’s strategy recommends should be delivered in the East Surrey CCG area between 2015 and 2025.
- 6.83 In addition, as identified in the evidence supporting the Development Management Plan and Surrey CC’s latest *Accommodation with Care & Support Strategy* – residents care needs can also be met in mainstream housing and there is an increasing trend for this due to advances in adaptations and in technology such as telecare, enabling people to live independently and remain part of their existing local communities.
- 6.84 Whilst it is appreciated that these options may not offer the same “environment” or meet the needs of residents in exactly the same way to that which the applicant’s aspire to provide though this “retirement village” concept or with the same spin-off social benefits, these are nonetheless considered to be legitimate options to meeting the needs of residents.

*Conclusion on need and alternative provision*

- 6.85 Although the exact scale of need is debatable and it is questionable whether it is quite as high as suggested by the applicant, it is nonetheless agreed that there is a level of current and future need for additional extra care provision in the borough which this development would contribute to meeting. In this respect, the scheme would find favour with the Framework – which encourages local planning authorities to plans for a mix of housing (including for older people and people with disabilities). This weighs in favour of the proposal; however, as the Planning Practice Guidance advises, *“unmet housing need...is unlikely to outweigh harm to the Green Belt and any other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.”* This guidance should be borne in mind in the overall planning balance.
- 6.86 However, whilst the applicant’s Sequential Test and Planning Statement are acknowledged, there are considered to be other legitimate options which would meet the needs of these residents, albeit this may not be in the specific form of a “retirement village”. The applicant’s allegation that the Council’s emerging strategy will be wholly inadequate to meet needs is not agreed, particularly since the emerging DMP incorporates allocations with the potential to deliver up to 180 units of specialist elderly accommodation, of which a significant proportion could realistically be delivered as Extra Care.

- 6.87 For this reason, the argument of an unmet need for extra housing is only considered to attract moderate weight in the planning balance.

*Social benefits*

- 6.88 In addition to the need for extra care housing, the applicant argues that additional social benefits would flow from providing such a facility. This includes health and social care implications for future occupants (such as reduced hospital stays, opportunities for social integration), reduced pressure on local health services and the freeing up of under occupied homes.
- 6.89 In principle it is acknowledged that a “retirement village” concept could give rise to the benefits suggested above, and that these benefits may be greater than if those needs were met through other formats of extra care or through enabling residents to stay in their existing homes supported by adaptations and/or technology. Indeed, Surrey County Council’s *Accommodation with Care & Support Strategy* acknowledges that delivery of extra care housing could support revenue savings (e.g. on social care costs).
- 6.90 The additional scale of such benefit is however very difficult, if not impossible to assert with any confidence and it cannot necessarily be guaranteed that they will indeed accrue. Whilst the Surrey CC Strategy assigns a potential figure of £1m in revenue savings, it must be uncertain whether such benefits would be felt at the local level (for example, the extra care scheme could attract in-migration of older residents from elsewhere which would deliver no real benefit of freeing up homes locally and would actually potentially increase pressure on local services).
- 6.91 As such, whilst there may be social benefits, they are considered to attract only moderate weight in the overall planning balance.

*Economic benefits*

- 6.92 The Planning Statement accompanying the briefly appraises the potential economic benefits of the proposed development. It identifies that the extra care scheme would generate jobs for approximately 27 staff (full time equivalent), with additional knock on benefits during construction and through the supply chain.
- 6.93 These benefits are acknowledged and, in the context of both the Framework and local policy, are afforded a limited degree of positive weight in the overall planning balance. For a development of what is relatively considerable scale, these economic benefits are however felt to be comparatively small.

*Other matters*

- 6.94 The Planning Statement argues that the proposals will deliver “environmental benefits to mitigate for the minor significant impacts” on the landscape. Clearly, as the statement identifies, these benefits are required to overcome harm and therefore cannot be considered to weigh in favour of the scheme.

- 6.95 The Planning Statement includes reference to environmental and ecological improvements to the site and the adjoining natural corridor (to the north of the site and within the applicant's ownership control). There is little, if any, detail at this stage of potential improvement to the adjoining natural corridor and hence very limited weight is attached to this benefit. In terms of ecological works on site, the Final Ecological Impact Assessment concludes that, for the most part, with the compensation/enhancements proposed, the residual impacts of the development on existing ecology on site would be largely neutral with one instance of "non-significant positive" effects and one instance of "non-significant negative effects". On this basis, the overall effect on the ecology within the site itself is largely neutral – any positive weight in favour of the scheme is negligible.
- 6.96 Other than general statements regarding the Council's housing land supply position and housing target (including the fact that it does not meet the full Objectively Assessed Need), no specific argument is advanced to justify the proposed private housing units. Based on the information submitted, there does not appear to be any functional link between these units and the extra care scheme, nor any argument that they are in some way required to enable (either operationally or financially), the extra care provision. This element of the scheme appears extraneous and gratuitous. It should be noted that the Council is currently able to identify a deliverable land supply (as set out in the published 2018 Housing Monitor) equivalent to 6.88 years and therefore clearly has a robust 5 year supply.
- 6.97 It is noted that the applicant puts forward within their submission, numerous appeal decisions in which similar schemes have been considered and allowed by Inspectors. Whilst these are acknowledged, it does not appear that any of these relate to sites within the Green Belt and thus their circumstances are materially different. They are not therefore considered to offer any assistance in determining this application which should be considered on its own merits.

#### Overall conclusions and planning balance

- 6.98 The proposal would introduce a significant scale and extent of built form onto what is presently an open, undeveloped site within the Green Belt, partially within the Surrey Hills Area of Outstanding Natural Beauty and within the locally Area of Great Landscape Value.
- 6.99 In terms of the Green Belt, the proposal would clearly be inappropriate development which is by definition harmful. In addition, it is considered that there would be a significant and appreciable adverse impact on the openness of the site and encroachment into the countryside, thus conflicting with one of the stated purposes of the Green Belt. It is concluded that the harm to the Green Belt would, in totality, be significant. In accordance with the Framework, this harm attracts substantial weight in the overall planning balance.
- 6.100 In addition, it is concluded that the proposals would constitute a major development within the Surrey Hills Area of Outstanding Natural Beauty, a fact which is accepted by the applicant. In this context, the specific tests in paragraph 172 of the Framework must be applied. The development is considered to give rise to a demonstrable adverse impact on landscape character at a localised scale and

would thus fail to conserve the landscape and scenic beauty of the AONB as described above. It would also erode the character of the locally designated AGLV, both as a landscape area in its own right and as a buffer to/the setting of the AONB.

- 6.101 The site is not considered to be in an optimal or accessible location for the purposes of development plan policies Ho21 or CS14, given the distance from shops, services and bus routes. Mindful of the response of the County Highway Authority, insufficient evidence has been provided to demonstrate that the proposals would not prejudice and harm to highway safety or appropriately support sustainable travel which further weighs against the proposal in the overall planning balance.
- 6.102 Taken together, it is therefore considered that the scheme gives rise to very substantial planning harm. Even if a satisfactory resolution was reached in respect of the transport and highway safety impacts, the harm to the Green Belt, valued landscapes and by virtue of poor location of the site would still be substantial.
- 6.103 The applicant has put forward a number of considerations and benefits to support the case for the extra care scheme. This includes evidence of a need for additional extra care accommodation in the borough (which in principle is not disputed), the health and social benefits offered by “retirement village” (some of which it is accepted would not be achieved to the same extent were the needs to be met through a different form of extra care provision), as well as additional limited economic and environmental benefits. The applicant’s argument that the need could not be met in other ways is not agreed and has not been robustly demonstrated so is afforded very limited weight.
- 6.104 Whilst these benefits of the scheme are appreciated and they are not considered individually or cumulatively to clearly outweigh the harm to the Green Belt and any other harm (which includes the landscape impacts and unresolved highway impacts) so as to constitute very special circumstances, particularly mindful of the advice in the National Planning Practice Guidance that *“unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”*. It is not considered that resolution of the highways issues would tip this balance the other way.
- 6.105 For similar reasons, it is not considered that it has been sufficiently proven that the development would be in the public interest so as to justify exceptional major development in the designated Surrey Hills Area of Outstanding Natural Beauty.
- 6.106 Furthermore, the benefits advanced by the applicant focus almost exclusively on the extra care element of the scheme with no substantive justification provided by the applicant for the four private dwellings proposed (aside from observations on the Council’s housing land supply and housing requirement). Whilst the overall planning balance is a cumulative test and there is no requirement to justify individual elements of a scheme, in absence of any justification or functional link, this element of the scheme, and the additional harm to the Green Belt and AGLV which it causes, could be considered to appear as somewhat gratuitous and unnecessary, particular given advice in the Framework regarding unmet needs.

- 6.107 In terms of equalities considerations, it is acknowledged that the provision of specialist housing of the nature proposed would be likely to support and benefit older people and those with disabilities and therefore withholding permission may reduce opportunities for such groups to access housing. However, as concluded above there are other ways in which the needs of such groups could be met and overall it is concluded that the wider dis-benefits of the proposal to the community and environment and large outweigh the potential positive impact on those with protected characteristics.
- 6.108 Consequently, it is recommended that planning permission is REFUSED for the reasons set out below.

## **REASONS FOR REFUSAL**

1. The proposal development constitutes inappropriate development within the Metropolitan Green Belt and, by virtue of the likely resultant scale and spread of built form, would erode the openness of the Green Belt and conflict with the purposes thereof. The considerations in favour of the proposal are insufficient to clearly outweigh the harm to the Green Belt and any other harm, including the adverse landscape impacts and inaccessible location of the site, so as to constitute very special circumstances. As such, the proposal would be contrary to policy Co1 of the Reigate and Banstead Borough Local Plan 2005, policies CS1 and CS3 of the Reigate and Banstead Core Strategy and the provisions of the National Planning Policy Framework in relation to protecting Green Belt land.
2. The proposal represents major development within the Surrey Hills Area of Outstanding Natural Beauty (AONB) and is considered to have a significant adverse impact on the landscape character of this designated area and the Area of Great Landscape Value (AGLV). The considerations put forward in favour of the scheme are considered insufficient to demonstrate that the proposal would be in the public interest so as to overcome the harm to the AONB and AGLV. The proposal would therefore be contrary to policy Pc1 of the Reigate and Banstead Borough Local Plan 2005, policies CS1 and CS2 of the Reigate and Banstead Core Strategy and the provisions of the National Planning Policy Framework.
3. The site is in an inaccessible location and the applicant has failed to provide sufficient information to enable the County Highway Authority to fully assess the highway and transportation implications of the proposed development, including the effectiveness of proposed sustainable transport measures. In its current form, it has not been demonstrated that the proposal would support sustainable travel and furthermore, could potentially lead to conditions prejudicial to highway safety by virtue of the inappropriate traffic calming. The proposal would therefore be contrary to policies Ho21, Mo4 and Mo5 of the Reigate and Banstead Borough Local Plan 2005, policies CS14 and CS17 of the Reigate and Banstead Core Strategy, the objectives of the Surrey Transport Plan 2011-2026 and the provisions of the National Planning Policy Framework in relation to promoting sustainable transport.
4. In absence of a completed legal agreement to secure appropriate restrictions on the occupancy of the extra care units, including minimum levels of care needs, it has

not been satisfactorily demonstrated that the proposed units would not constitute Use Class C3 residential accommodation and thus the proposal fails to make adequate provision for affordable housing and is therefore contrary to policy CS15 of the Reigate and Banstead Core Strategy 2014 and the Affordable Housing SPD 2014.

5. In absence of a completed legal agreement to secure the required affordable housing contributions from the proposed private market dwellings, the proposal fails to make adequate provision for affordable housing and is therefore contrary to policy CS15 of the Reigate and Banstead Core Strategy 2014 and the Affordable Housing SPD 2014.

The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and whilst planning permission has been refused regard has been had to the presumption to approve sustainable development where possible, as set out within the National Planning Policy Framework.

## **INFORMATIVES**

1. The applicant is advised that if an acceptable legal agreement was provided to secure the affordable housing financial contribution on the private residential dwellings and secure appropriate restrictions on the occupation of the extra care units, the Council would not pursue the fourth and fifth reasons for refusal in the event of an appeal.

# 17/01929/OUT - Land To The North Of Rockshaw Road, Merstham





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REV	DESCRIPTION	DATE	AUTHOR	CHK'D
A	Planning Issue	08/17	ZC	

scale 1:500

0 10m 20m 30m

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PROJECT

Rockshaw Road  
Merstham, Surrey  
For: Retirement Villages

DRAWING

Site Layout  
Parcel C and D

SCALE	DATE	AUTHOR	CHK'D
1:500 @ A1	July 17	PR	

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PROJECT

Rockshaw Road

Merstsham, Surrey

For: Retirement Villages

DRAWING

Site Layout

Parcel B

SCALE	DATE	AUTHOR	CHK'D
1/500 @ A3	July 17	PR	

JOB NO.	DRAWING NO.	REV
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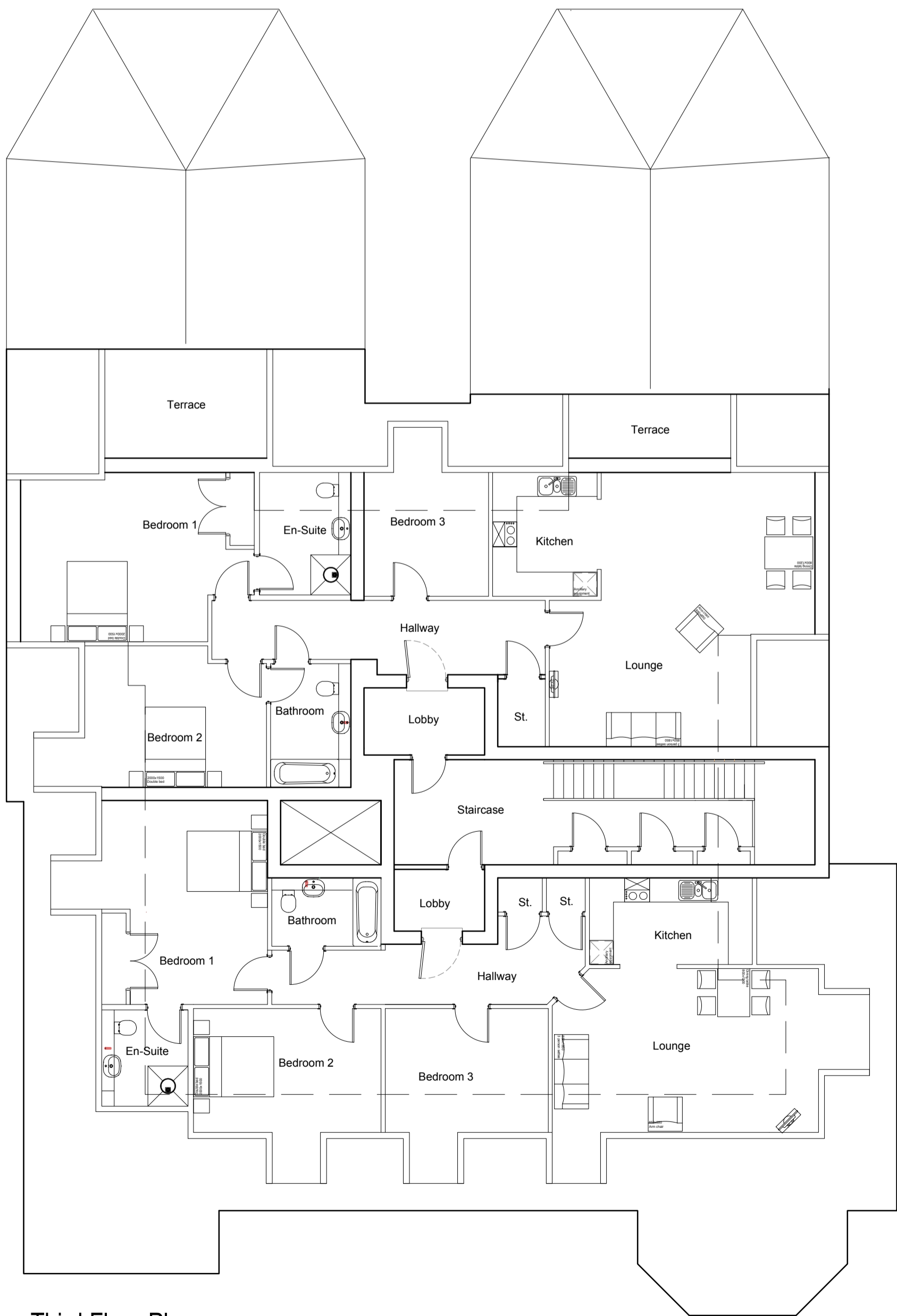


Front Elevation

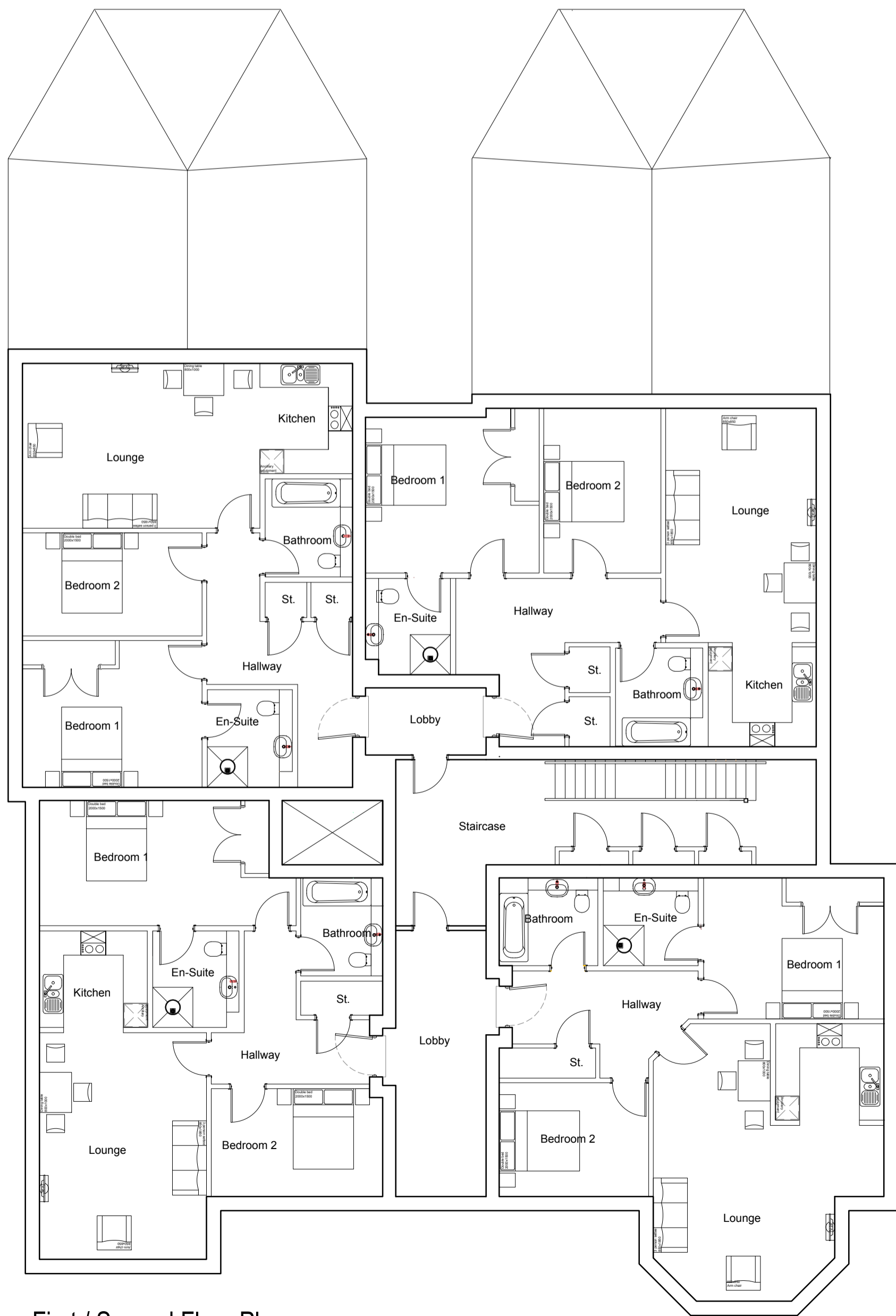
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Rear Elevation



Third Floor Plan



First / Second Floor Plan

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For: Retirement Villages

DRAWING  
Plots 65-70 including Club House  
Floor Plans and Elevations

SCALE	DATE	AUTHOR	CHK'D
1/100 @ A1	17/07/17	ZC	

JOB NO.	DRAWING NO.	REV
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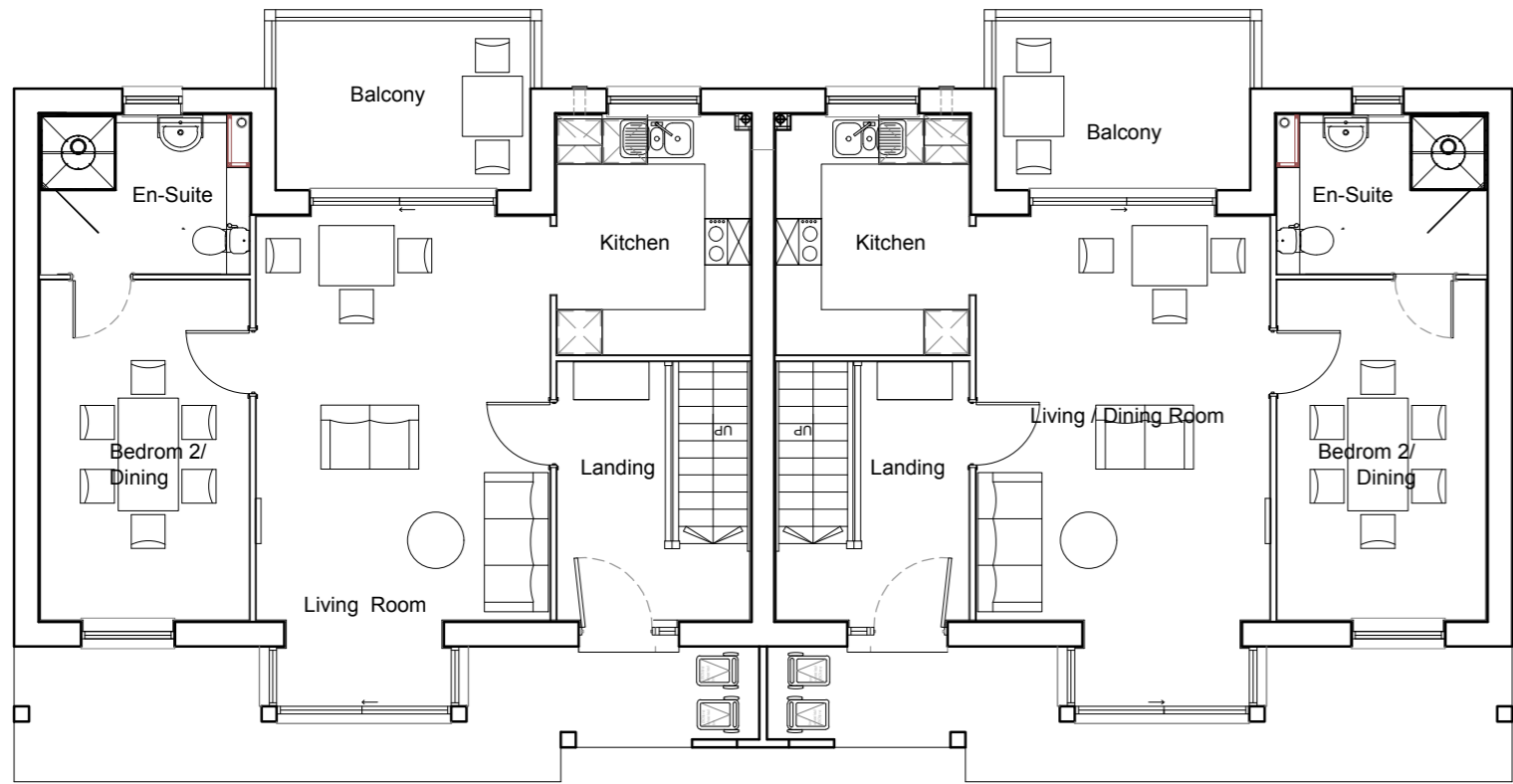
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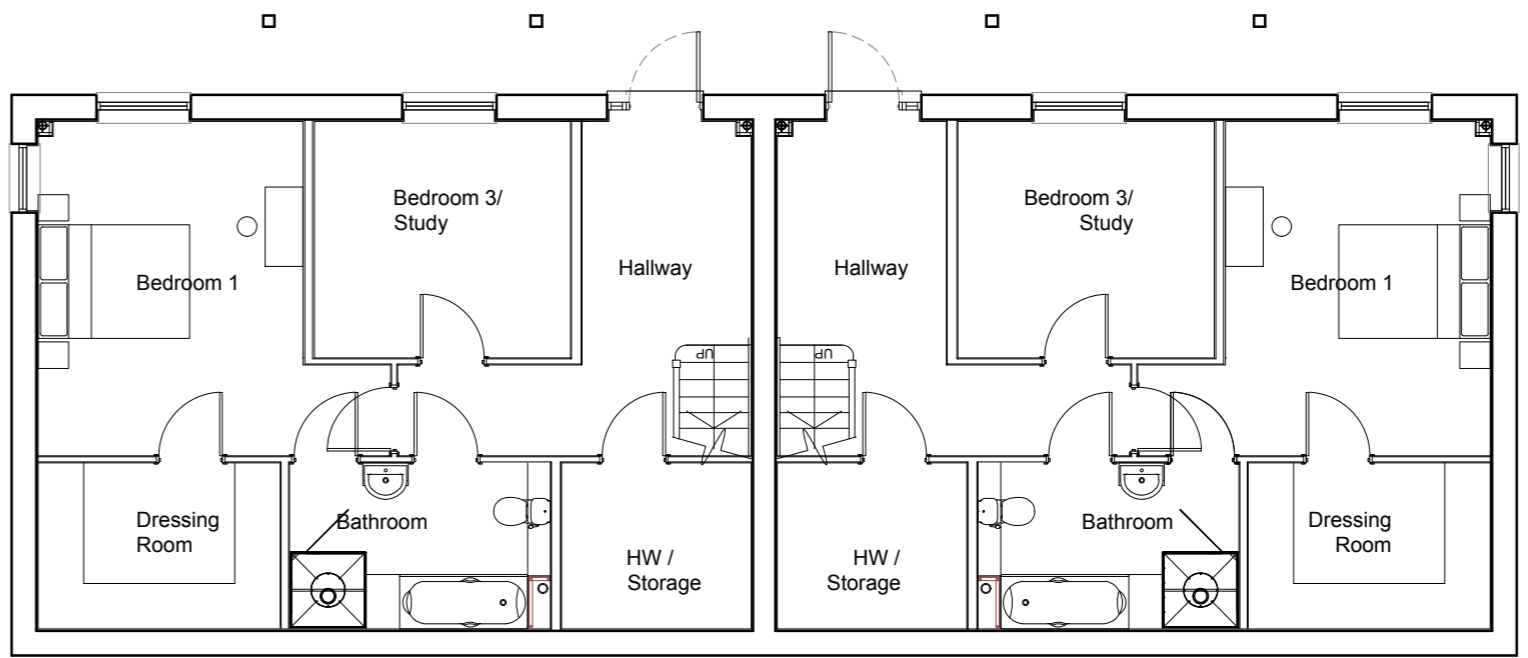
Side Elevation



Rear Elevation



Upper Floor Plan



Lower Floor Plan

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PROJECT  
Rockshaw Road  
Merstham, Surrey  
For: Retirement Villages

DRAWING  
House Type A  
Floor Plans and Coloured Elevations

SCALE	DATE	AUTHOR	CHK'D
1/100 @ A2	07/17	VL/ZC	
JOB NO.	DRAWING NO.	REV	
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