

 Reigate & Banstead BOROUGH COUNCIL Banstead Horley Redhill Reigate	TO:	PLANNING COMMITTEE
	DATE:	20 th May 2020
	REPORT OF:	HEAD OF PLANNING
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AGENDA ITEM:	5	WARD: Lower Kingswood Tadworth And Walton

APPLICATION NUMBER:	19/01176/F	VALID:	26th June 2019
APPLICANT:	Kingswood Fields Lt (Fidelity International)	AGENT:	Planology Ltd
LOCATION:	KINGSWOOD FIELDS MILLFIELD LANE LOWER KINGSWOOD SURREY KT20 6RP		
DESCRIPTION:	Extension of existing multi-decked car park, including associated landscaping works and plant enclosure, to provide an additional 326 car parking spaces. Provision of temporary surface car parking for 500 cars on the playing fields adjacent to the pavilion building during construction works for a period of 13 months after which it will be reinstated to its existing grassland condition. As amended on 19/08/2019, 23/08/2019, 30/09/2019, 21/11/2019 and on 05/12/2019.		
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SUMMARY

The site comprises offices in occupation by Fidelity International (the applicant) who currently employ a total of 1097 staff on the site. The Applicant is planning to restructure the UK offices, of which there are presently three: the application site, 25 Canon Street, London and Oakhill House in Hildenborough, Kent. It is intended to relocate approximately 539 employees from their site in Kent to the site at Kingswood Fields which would bring the total number of employees on site to approximately 1636 by the end of 2020. Furthermore, they intend to employ additional staff up to the year 2025 when it is anticipated that 2200 staff would be employed at the application site.

The proposed staff relocation to these existing offices does not, of itself, require planning permission. However, three applications are made to assist with this restructure: this one, together with a new pavilion and new landscaping works.

This is a full planning application for extension of the existing 399-space multi-decked car park, including associated landscaping works and plant enclosure, to

provide an additional 326 car parking spaces, bringing the total to 725. The site currently has a total of 971 spaces and the proposal would increase this to 1297.

The application also proposes the provision of a temporary surface car parking for 500 cars on the playing fields adjacent to the pavilion building during construction works for a period of 13 months, whilst the decked parking area is constructed, after which it will be reinstated to its existing grassland condition (secured by condition 20).

Much of the site is covered by a Tree Preservation Order and large areas are designated Ancient and Semi-Natural Woodland. The site lies within land designated as Metropolitan Green Belt Land and Area of Great Landscape Value with the surrounding area also falling within these designations. The north and western parts of the site are also designated a Site of Nature Conservation Importance.

Based on the form and bulk of the resulting multi-decked car park, when compared to the existing, it is considered that the proposed development would be considered a disproportionate addition and therefore constitute inappropriate development within the Metropolitan Green Belt for which very special circumstances would be required.

The NPPF advises that "Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

In this case there would be also be some harm arising from the development being sited within the 15 metre ancient woodland buffer zone that lies to the north and west of the car park. However, the existing car park already encroaches into the buffer zone and the proposal would not result in the loss of any further areas of ancient woodland. Rather, it would vertically increase existing development within this buffer and only marginally increase footprint by virtue of new stairwells. Albeit this is acknowledged to have an impact, its impact is considered less than new development within the buffer zone. Conditions are recommended to ensure a net gain in biodiversity, including the net gain of 108 new trees and the securing of a woodland management plan.

The harm to the openness of the Green Belt and any other harm by way of the encroachment into the ancient woodland buffer zone must be balanced against the benefits of the proposed development. In this regard, the proposal would contribute towards economic growth, support a local business and help existing jobs as well as having potential for additional job creation. The proposed parking would also assist in the avoidance of off-site parking demand on nearby streets, whilst the proposal also brings benefits in terms of an updated travel plan, new shuttle bus service and on-street parking demand review. As a result, very special circumstances are considered to exist to outweigh the harm caused. As a consequence, the development would accord with Policy NHE5 of the Development Management Plan, Core Strategy Policy CS3 and the provisions of the NPPF in relation to Green Belt.

A high number of the objection letters received raised objection on the basis of increase in traffic and congestion, hazard to highway safety and inadequate parking. The submission has been carefully considered by the County Highway Authority and subject to the recommended conditions and measures to be secured by way of a S106 agreement, the proposal is considered acceptable in terms of highway impacts. Highways England were also consulted upon the proposal recommend that conditions should be attached to any permission that may be granted. It should be noted that the application relates to additional parking only, not for the offices themselves or an expansion to them. There is no existing condition or other limit restricting the number of employees that may work within the office and it is therefore material that these impacts could occur irrespective of this application.

The proposal is not considered to result in a harmful impact upon the amenities of neighbouring dwellings and the design of the car park would be functional and accord with the existing style of the parking area.

RECOMMENDATION(S)

Subject to the completion of all documentation required to create a planning obligation under Section 106 of the Town and Country Planning Act 1990 (as amended to secure:

1. A financial contribution of £6150 toward auditing the travel plan reference FIML 2018 4119 TP06.
2. The provision of a shuttle bus service from Tonbridge to Kingswood in accordance with details and timing to be submitted to and approved in writing with the local planning authority.
3. A review of on street parking demand from Fidelity Kingswood on Green Lane, Chipstead Lane, Smithy Lane, and Beechan Lane from the date that staff are relocated from Kent up to a period lasting five years post full occupation in accordance with a methodology to be submitted to and approved in writing with the Local Planning Authority. If there is demand for car parking on these streets the developer is to fund and implement an appropriate Traffic Regulation Order to provide parking restrictions to mitigate such parking.

Planning permission is **GRANTED** subject to conditions.

In the event that a satisfactorily completed obligation is not received by 19 July 2020 or such longer period as may be agreed, the Head of Places and Planning be authorised to refuse permission for the following reason

1. The proposal fails to provide an agreed contribution towards financial contribution of £6150 toward auditing the travel plan, the provision of a shuttle bus service and review of on street parking demand, and would thereby fail to promote sustainable modes of transport contrary to policy TAP 1 of the Development Management Plan 2019.

Planning permission is **GRANTED** subject to conditions.

Consultations:

Highway Authority: The County Highway Authority has undertaken an assessment in terms of the likely net additional traffic generation, access arrangements and parking provision and are satisfied that the application would not have a material impact on the safety and operation of the adjoining public highway. The County Highway Authority therefore has no highway requirements subject to conditions. – Full comments at paragraph 6.17.

Lower Kingswood Residents Association: Summary – always expressed opposition to any development on Green Belt. Road safety is a primary concern, bearing in mind the children's playground in Chipstead Lane and nursery /playgroup in Smithy Lane. Supports appropriate 'traffic calming' measures. A reduced speed limit (of 20mph) may be worth consideration for Smithy Lane. Concern about the lack of facilities for pedestrians to cross the A217 from the vicinity of Green Lane to 'Holly Lodge', traffic light controlled crossings would be more appropriate. Heavy goods vehicle traffic should be minimised and limited to 'normal working house'. Would like to see a reduction in overnight HGV traffic to/from Kingswood Fields.

Natural England – summary – 'no objection – based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutory protected nature conservation sites or landscapes.' Refer to standing advice.

Forestry Commission – refers to standing advice

Highways England: recommend that conditions should be attached to any planning permission that may be granted – Full comments at paragraph 6.19

Surrey Hills AONB Planning Adviser – 'The site lies within the AGLV and is not seen in relation to the Surrey Hills AONB some distance to the south.

From a desktop exercise I consider the following protected landscape considerations should be taken into account in determining this application.

The Government has just (21 July 2019) published its updated Guidance on the Natural Environment. In the section (para 036) on landscapes it now places greater importance than before on locally-designated landscapes and also the wider countryside and not just nationally designated landscapes. It is mainly directed towards the preparation of local plans but the points made equally apply to the consideration of applications within locally-designated landscapes; the Surrey AGLV being one. This site also adjoins a candidate AONB area recommended to Natural England in the 2013 Landscape Character Assessment carried out by independent specialist landscape consultants advising Natural England on its proposed Surrey Hills AONB Boundary Review.

The Guidance also reminds Councils that Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on them to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. The Government's 25 Year Environment Plan took this duty further and this latest

Government Guidance at paragraph 020 elaborates upon this. It promotes the principle of net gain in planning which describes an approach that leaves the natural environment in a measurably better state than it was beforehand. It states that net gain is an umbrella term for both biodiversity net gain and wider environmental net gain.

The site is obviously an established major employment site and the proposal does not involve developing a green field site. Nevertheless, the proposed size and bulk of the extended multi-storey car park would be significant and it would facilitate greater traffic movements in the locality and activity. The applicants are a major financial institution that can be expected to wish to respect the environment and be seen to do so. Their ownership extends well beyond the application site and includes the wider landscape setting, parts of which are an AONB candidate area.

I suggest therefore that if you consider the proposals could potentially be acceptable, you approach the applicant's agents to ask that they make an additional supporting submission within this application for specialists to assess the biodiversity and landscape of the wider land ownership and put forward significant proposals to enhance them as a net gain.

Incidentally, I could not find on the Council's website a Design and Access Statement or Planning Statement that are normally required in proposals of this and even much smaller scale.

You may wish to re-consult Natural England and me following receipt of such an additional submission. Natural England may wish to give you a greater insight into this updated Government Guidance. I have therefore copied this email to Lauren Schofield who responded to your consultation before this updated guidance was issued'

Surrey Wildlife Trust: – *'Thank you for re-consulting the Surrey Wildlife Trust with regards to the following additional updated information submitted to inform the above proposed development;*

Additional submitted information -

Letter dated 8th January 2020, author SJA Trees reference 00529-02, titled 'Ref. Kingswood Fields';

Plan titled 'Site Wide Biodiversity and Habitat Enhancement Plan, no. BD0210 SD 030 R02', dated 8th January 2020, author BD Landscape Architects;

'Ecological Mitigation Plan', author Arbtech Consulting Ltd, dated 8th January 2020; and

Letter dated 8th January 2020, author Arbtech Consulting Ltd, titled 'File Note: Addendum to the Ecology Mitigation Plan dated 24/09/2019'.

My comments below should be read in conjunction with previously submitted consultation responses with regards to proposed development at this location.

Protected habitat – Ancient woodland

The above referenced letter from SJA Trees acknowledges that the proposed temporary car park and new pavilion building proposed under application

19/01184/F incurs to a limited extent within the 15m minimum recommended semi-natural habitat buffer of the adjacent ancient woodland. It is accepted that the car park in this location is temporary in nature and it is confirmed that proposed development will not incur within the tree root protection zones.

The above referenced letter from SJA Trees also acknowledges an increased incursion into the ancient woodland buffer adjacent to the multi-storey car park proposed under application reference 19/01176/F including incursion within rooting zones. The letter states “the existing MSCP already encroaches into the buffer zone by 597m²... the proposed car park makes a minor increase on this and makes a significantly reduced incursion than it might have done had the existing structure been proposed to be removed and a completely new structure constructed... proposals posed no significant changes .. that would result in additional arboricultural harm to the ancient woodland, beyond the effects already exerted by the existing MSCP”.

The letter therefore argues that damage is already done and could have been worse had they chosen a different development proposal. The letter provides no further proposals for the avoidance or mitigation of adverse impacts.

The letter does not present a valid argument and I refer you to the government’s standing advice with regards to the avoidance of loss or deterioration of ancient woodland habitats, (<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences#assess-the-impacts>) which states “Where a proposal involves the loss of ancient woodland, you should not take account of the existing condition of the ancient woodland when you assess the merits of the development proposal. Its existing condition is not a reason to give permission for development.”

The proposed development therefore presents further deterioration of ancient woodland. I therefore refer the Council to the obligations of the National Planning Policy Framework which requires refusal of a planning permission if development will result in the loss or deterioration of ancient woodland.

The above referenced letter from Arbtech Consulting Ltd suggests that mitigation for adverse impacts on the ancient woodland “could include improving the condition of the rest of the ancient woodland... creating a forest management plan”. The letter proposes that “the creation of this document should be written into a planning permission”.

I welcome the proposal for submission of a woodland management plan, secured by planning condition, to contribute to the evidence of measureable biodiversity net gain across the development site as a whole and also to mitigate for adverse impacts to the ancient woodland such as temporary incursion from the temporary car park. However, the woodland management plan should be presented as part of a suite of measures to mitigate for biodiversity impacts and is not sufficient alone as compensation for acknowledged increased deterioration of the ancient woodland, as a result of development.

I again refer the Council to the government’s standing advice which states “ Ancient woodland, ancient trees and veteran trees are irreplaceable. Consequently you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal.”

I therefore again advise that on the basis of information currently presented, the application as submitted remains contrary to the obligations of the National Planning Policy Framework (NPPF) with regards to adverse impacts on the adjacent Ancient Woodland and should therefore be refused.

On the assumption that the above issues relating to ancient woodland are satisfactorily resolved prior to determination of the current planning permission, we also recommend the following;

Sensitive lighting

The above letter from SJA Trees notes that the temporary external car park is to subject to exterior lighting provision. I therefore wish to reiterate comments provided in my email dated 7th January 2020 which remain valid;

I recommend that a detailed lighting plan for the whole development site is therefore produced to demonstrate that artificial lighting will not adversely affect nocturnal species present within ancient woodland habitats adjacent to the development site. This plan should be submitted to the Council for approval in writing prior to the commencement of development. The plan should be written in consultation with a suitably qualified ecologist and have regards to best practice lighting guidance for avoidance of impacts on nocturnal species. Any external lighting installed on this development should comply with the recommendations of the Bat Conservation Trusts' document entitled "Bats and Lighting in the UK – Bats and The Built Environment Series". The above referenced Ecological Mitigation Plan by Arbtech Consulting Ltd provides appropriate recommendations with regards to external artificial lighting.

Biodiversity net gain

I note the submission of the above referenced Ecological Mitigation Plan by Arbtech Consulting Ltd and associated referenced Site Wide Biodiversity and Habitat Enhancement Plan. These documents present proposals for biodiversity mitigation measures across the development site as a whole. While being unambitious in terms of achieving a net gain ("net gain of 5 semi-mature trees overall"), I have evaluated these documents in conjunction with the above offered submission of a woodland management for specific enhancements of the site's ancient woodland. I can therefore advise that should the Council be minded to grant permission for this proposed development, that the development should be required to proceed only in strict accordance with the provision of the above referenced Ecological Mitigation Plan and Site Wide Biodiversity and Habitat Enhancement Plan. Ecological mitigation should have regards to the submission of an appropriately detailed woodland management plan (with details of management and financial security of the plan for the long term). The woodland management plan should be submitted to the Council for approval in writing prior to commencement of development.'

UK Power Networks: - no comments received

Tadworth and Walton Residents Association – concern on the grounds of increase in traffic and congestion, impact on Green Belt and AGLV. Request independent traffic assessment, traffic management scheme, temporary car park conditioned to ensure short a period as possible, environmental/habitat benefits. Concern at loss of large employment site

Representations:

Letters were sent to neighbouring properties on 27th June and 25th November 2019 a site notice was posted 12th June 2019.

100 responses have been received raising the following issues:

Issue	Response
Loss of/harm to trees	See paragraph 6.26 – 6.42 and conditions 14, 16, 18 and 19
Increase in traffic and congestion	See paragraph 6.17 - 6.20 and conditions 5 – 15 and
Light pollution	See paragraph 6.14, 6.24, 6.25 6.32, 6.33, 6.35, 6.42 and condition 17
Harm to Green Belt/countryside	See paragraph 6.2 – 6.16 and condition 22
Hazard to highway safety	See paragraph 6.17 - 6.20 and conditions 5 - 15
Harm to wildlife habitat	See paragraph 6.26 – 6.35 and conditions 16 - 19
No need for the development	See paragraph 6.2 – 6.14
Noise and disturbance	See paragraph 6.24
Drainage/sewage capacity	See paragraph 6.47 and condition 23
Harm to Conservation Area	See paragraph 6.44
Health fears	See paragraph 6.45
Inconvenience during construction	See paragraph 6.45 and condition 10
Out of character with surrounding area	See paragraphs 6.21 – 6.23 and condition 4
Overdevelopment	See paragraph 6.2 – 6.16
Overshadowing	See paragraph 6.24
No community use	See paragraph 6.48
Inadequate parking	See paragraphs 6.17 – 6.20
Flooding	See paragraph 6.47
Overbearing relationship	See paragraph 6.24
Air quality	See paragraph 6.43
Human rights	See paragraph 6.45
Property devaluation	See paragraph 6.46

1.0 Site and Character Appraisal

- 1.1 The site comprises three large office buildings, Windmill Court, Kingswood Place and Beechgate with various smaller plant rooms, sheds and smoking shelters. Windmill Court is designated a Locally Listed Building; this is the largest of the three buildings and is a former print works, The Windmill Press, built in 1925 by Lord Gerald Wellesley, 7th Duke of Wellington & Trenwith Wills for William Heinemann. The three main office buildings are concentrated towards the southern part of the site.
- 1.2 There are large areas of car parking on site that includes a tiered, partly sunken car park. The parking is arranged in curved linear rows, mostly to the north and east of the office buildings.
- 1.3 The office buildings are set in large, spacious, landscaped grounds that also accommodate a sports pavilion and cricket pitch. This is sited on the north eastern side of Millfield Lane. The existing pavilion lies to the north east of the main office buildings on site and has an area of hardstanding around the building where materials are stored, maintenance machinery and containers are located. The pavilion is finished in red brick with a tile roof and has a traditional, sports pavilion appearance. A large cricket pitch sits to the north west of the pavilion and this area of the site is bounded by mature trees and woodland. A public footpath runs immediately to the south of the sports pitch.
- 1.4 The site contains many mature trees. Much of the site is covered by a Tree Preservation Order and large areas are designated Ancient and Semi-Natural Woodland.
- 1.5 The site lies within land designated as Metropolitan Green Belt Land and Area of Great Landscape Value with the surrounding area also falling within these designations. The north and western parts of the site are also designated a Site of Nature Conservation Importance. There is residential development to the north and south of the site within Chipstead Way and Green Lane. The site is accessed from Millfield Lane with a second access from Green Lane.

2.0 Added Value

- 2.1 Improvements secured at the pre-application stage: Pre-application advice was sought on three occasions prior to the submission of the application. Concern was raised over the impact upon the openness of the Metropolitan Green Belt. The proposal was considered inappropriate development and would require the justification by way of very special circumstances. Ecological concerns were raised and the requirement for a habitat survey and mitigation measures. The Applicant was strongly advised to engage with the CHA through their own pre-application advice service for their views on such a proposal.

- 2.2 Improvements secured during the course of the application: During the course of the application additional and amended information has been received in regard to highways, design of the car park and ecology and biodiversity.
- 2.3 Further improvements could be secured: Conditions are proposed in regard to highways, tree protection, ecology, biodiversity and lighting.

3.0 Relevant Planning and Enforcement History

There is extensive planning history for the site, including two applications that are also pending consideration at this time.

3.1	20/00654/F	Erection of temporary pre-fabricated kitchen units for up to six months	Pending decision
3.2	19/01184/F	Demolition of the existing pavilion, grounds maintenance buildings and hard standing areas. Construction of a new replacement pavilion and a replacement grounds maintenance building (ancillary to the main campus), including associated car and cycle parking, external plant enclosure and landscaping works.	Pending decision
3.3	19/01177/F	Provision of new landscaping in-between the existing three office buildings.	Pending decision
3.4	97/12130/F	Temporary surface car parking for 350 cars	Approved with conditions 8 th June 1998
3.5	97/09100/F	Revised design and siting for tiered car park approved under Ref: RE96P/1089	Approved with conditions 9 th June 1998
3.6	96/10890/F	Development of additional car parking facilities to serve Kingswood Fields Business Park comprising one new partial sunken, two storey tiered car park one new surface car park	Non-determination
3.7	96/10640/RET	Temporary Surface Car Parking for 150 Cars	Approved with conditions 10 th October 1996

- 3.8 87/12450/F Removal of condition 11 attached to planning permission 86p/1398 dated 24-6-87 to allow the whole development to be used as business/office accommodation Approved 19th November 1987
- 3.9 86/13980/OUT Former Heinemann Press Premises (The Windmill Press). Refurbishment of main building and redevelopment of rest of part of site to create a high quality business accommodation capable of use for production and or research. Approved with conditions 24th June 1987

4.0 Proposal and Design Approach

- 4.1 This is a full planning application for extension of the existing multi-decked car park, including associated landscaping works and plant enclosure, to provide an additional 326 car parking spaces. The application also proposes the provision of a temporary surface car parking for 500 cars on the playing fields adjacent to the pavilion building during construction works for a period of 13 months after which it will be reinstated to its existing grassland condition.
- 4.2 The proposed 326 additional parking spaces would be accommodated by way of an extension to the basement, ground and first floor of the existing multi-storey car park and the addition of a second storey. The proposed extension would see the existing car park extended 18m south eastwards and an additional tier added to the existing structure.
- 4.3 The proposed number of parking spaces within the multi-storey car park would be as follows:

	Existing spaces	Existing retained	Proposed new spaces	Total parking spaces
Basement	134	128	53	181
Ground	131	128	52	180
First	134	128	52	180
Second			184	184
Total	399	384	341	725

- 4.4 Four new staircases are also proposed, two on the eastern elevation and two on the western. Entrance/exit to the car park would be maintained in the same position as the existing, towards the south western corner and eastern flank.
- 4.5 The design of the car park would be functional in appearance, the built form would include a galvanised steel frame with the finishing colour proposed to be controlled by way of condition. The new upper tier of parking would be timber clad with vertical battens and would feature elements of planted walls.

- 4.6 The proposed temporary parking would be sited on the existing playing fields adjacent to the pavilion building. A total of 500 parking spaces are proposed on the playing field. 500 would be required for a period of 9 months, and this would reduce to 160 spaces required for a further 4 months. The parking would be arranged in formal rows and an entrance made on the south western side of the site, and exit through the existing pavilion access.
- 4.7 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.
- 4.8 Evidence of the applicant’s design approach is set out below:

Assessment	The surrounding area is assessed as being with the Metropolitan Green Belt and an Area of Great Landscape Value. Part of the site is designated Ancient Woodland and the majority of the site is covered by Tree Preservation Orders. The campus comprises of some 13.85ha of land to the east of the A217, north of Green Lane and south of Chipstead Lane, near Lower Kingswood.
	No site features worthy of retention were identified.
Involvement	Three public consultations events were held during May, two onsite at Kingswood Fields and one at the Lower Kingswood Residents Association Annual General Meeting. 300 invitations were delivered to surrounding residents, local Councillors, local businesses, Kingswood Primary School and the Residents Association. Section 4.5.5 of the Planning Statement notes the feedback on the proposals for redevelopment of the site were mostly around perceived traffic and parking impacts from the additional staff.
Evaluation	The proposals were informed by the aim to provide additional on site parking and the designations within the site.
Design	The applicant’s reasons for choosing the proposal from the available options were informed by the existing layout and built form of the car park, landscape designations and Metropolitan Green Belt and in response to pre-application advice.

4.9 Further details of the development are as follows:

Site area	0.55 hectares
Total existing parking spaces	971
Total proposed parking spaces	1297

5.0 Policy Context

5.1 Designation

Metropolitan Green Belt
Area of Great Landscape Value
Site of Nature Conservation Importance
Ancient and Semi-Natural Woodland
Tree Preservation Order RE59
Locally Listed Building - Windmill Court

5.2 Reigate and Banstead Core Strategy

CS1(Sustainable Development)
CS2 (Valued Landscapes and Natural Environment),
CS3 (Green Belt)
CS4 (Valued Townscapes and Historic Environment)
CS5 (Valued People/Economic Development),
CS10 (Sustainable Development),
CS11 (Sustainable Construction),

5.3 Development Management Plan 2019

NHE1 (Landscape protection)
NHE2 (Protecting and Enhancing biodiversity and areas of geological importance)
NHE3 (Protecting trees, woodland areas and natural habitat)
NHE5 (Development within the Green Belt)
NHE9 (Heritage assets)
DES1 (Design of new development)
DES8 (Construction Management)
TAP1 (Access, parking and servicing)

5.4 Other Material Considerations

National Planning Policy Framework
National Planning Practice Guidance
Supplementary Planning Guidance Surrey Design
Local Distinctiveness Design Guide

Other Human Rights Act 1998

Community Infrastructure Levy
Regulations 2010

6.0 Assessment

6.1 The main issues to consider are:

- Impact on the Green Belt
- Design and character
- Neighbour amenity
- Access and parking
- Impact on trees
- Ecology
- Other matters

Impact on the Green Belt

6.2 The application site is located within the Metropolitan Green Belt; the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of green belts are their openness and permanence. The National Planning Policy Framework (NPPF) states that the local planning authority should regard the construction of new buildings as inappropriate development in the green belt. Inappropriate development is by definition, harmful to the green belt and should not be approved except in very special circumstances.

6.3 Paragraph 145, parts (c) and (g) of the NPPF states:

A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

– not have a greater impact on the openness of the Green Belt than the existing development; or

– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

6.4 The proposal may therefore be considered appropriate development providing it does not constitute a disproportionate addition over and above the size of the original building.

	Existing multi storey car park	Proposed multi storey car park	Increase
Parking spaces	399	725	326
Gross internal area	8850.6 m ²	17194.9 m ²	8344.3 m ² (116%)
Volume	16975 m ³	37250.3 m ³	20272.2 m ³ (119%)
Footprint	3239 m ²	4769 m ²	1526 m ² (47%)

6.5 The Applicant concludes that the proposal, from the options available, could be considered appropriate development under the NPPF para 145 (g) as *‘although the extension provides for 326 additional car parking spaces, the footprint of the existing multi-decked car park is only increased by less than half of the original. The very unique nature of the campus means that it is largely bounded by Ancient Woodland which provides a natural boundary for the site, and by located the extension in towards and on the other developed areas of the site is does not erode the edge of the site or encroach outside of the site boundary’. ‘The gradient of the land at this part of the site has been used advantageously to conceal much of the development below ground level. In addition the application of vertical timber cladding, green walls and significant soft landscaping around the perimeter allow the extension to integrate into the landscape, ensuring that the openness of the Green Belt is preserved and the character and setting of the AGLV is enhanced.’* The Applicant concludes that the proposals should be considered appropriate development in the Green Belt for these reasons.

6.6 It is acknowledged that an analysis of footprint and volume is only one indicator when considering whether an extension would be disproportionate and one must consider the wider impact upon the openness of the Green Belt and consideration had for the form, bulk and height of the proposal. The proposed extension would see an increase in height and footprint, spreading the development of the car park into a landscaped and wooded area to the south of the existing structure and further extended out slightly to the sides of the building where new staircases are proposed. Based on the form and bulk of the resulting building, when compared to the original, it is considered that the proposed development would be considered a disproportionate addition and therefore inappropriate development.

6.7 Paragraphs 143 and 144 of the NPPF state

143. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

144. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

- 6.8 In this instance, very special circumstances would be required to outweigh the harm identified to the Green Belt and any other harm, which includes that to the ancient woodland (see below). The car park sits adjacent to an area of ancient woodland and currently within the 15m buffer zone. The proposal would create additional development within the buffer zone and on this basis Surrey Wildlife Trust have objected to the proposal.
- 6.9 The proposed extension to the car park is proposed to accommodate an increase in the number of employees that will be moving to the site through the restructure of the business and sites operated by the applicant, moving staff from the Kent office to Kingswood Fields and the recruitment of additional staff. Fidelity International occupy the application site and the buildings are in office use, employing a total of 1097 staff. The Applicant is planning to restructure the UK offices of the business, of which there are presently three: the application site, 25 Canon Street London and Oakhill House in Hildenborough, Kent. The restructuring of the offices into two principal sites is sought to improve efficiency, sustainability and flexibility within the business. The Applicant wishes to relocate approximately 539 employees from their site in Kent to the site at Kingswood Fields and would bring the total number of employees on site to approximately 1636 by the end of 2020. Furthermore, Fidelity International plan employing additional staff up to the year 2025 when they anticipate 2200 would be employed at the application site.
- 6.10 The proposed staff moves from Kent to the application site and the proposed recruitment of new staff, both resulting in increasing the number of employees working at the application site, do not require planning permission. The increase in employee numbers would lead to a demand for on street parking in the surrounding roads. The surrounding roads nearest the site include Chipstead Lane, Beechen Lane, Green Lane and Smithy Lane. These are largely residential roads, with Chipstead Lane becoming more rural as it heads eastwards away from the site and it is considered these roads would be most affected by increased demand for on street parking. To mitigate this off-site impact, the Applicant is proposing to increase the on-site parking provision by increasing the parking capacity by 326 spaces.
- 6.11 The planned refurbishment/re-organisation would provide space for 1610 desks which would meet the desk requirements to beyond 2025. The Applicant has through a combination of business operation changes (flexible and remote/home working, investment in technology) and travel planning methods identified that the minimum number of additional parking spaces required would be 326.
- 6.12 The Travel Plan submitted has been carefully considered by the County Highways Team. The CHA has identified the worst case under provision of parking spaces would be 46 spaces. This could be accommodated within the site which is a large campus with an internal road network within which cars could be parked. However, in practice it is unlikely that all staff would want to relocate and therefore the quantum of cars seeking a space to park would be less. Significant weight is attached to the consideration that the proposed

parking spaces would, in practice, likely accommodate the increased parking demand and avoid off site parking demand on nearby streets.

6.13 The Applicant has also advanced very special circumstances in the form of:

- *'The socioeconomic benefit to the borough, provided by the consolidation of Fidelity's South-East sites at Kingswood Fields. Fidelity currently spends over £450,000 per year on goods and services within 10 miles of the Kingswood Field site, and an additional c£100,000 within 10 – 20 miles. This will increase the additional staff on site. This is in addition to the business rates which Fidelity pay to Reigate and Banstead Borough Council that contribute to services in the borough. Therefore the future viability of this site for continued employment use, and the socioeconomic benefits it provides depend on being able to use the existing employment floorspace more efficiently, and the provision of the associated car parking.*
- *Fidelity are the single largest local private employer in the Borough and these proposals enable the delivery of future additional employment opportunities without the need for additional buildings. This helps meet the employment requirements of the local area as set out in the Local Economic Needs Assessment update from June 2016, targets which form part of the emerging Local Plan. Currently over 30% of the staff employed on site live in the Borough. The more efficient use of the site, supported by this application, will allow for future local employment growth.*
- *The biodiversity and ecological enhancements provided by the proposed landscape improvements and overall masterplan for the site, including the enhancement of native species diversity and biodiverse planting to provide increase habitats for wildlife, pollinators and protected birds and bats*
- *The provision of enhanced tree management and planting within the Ancient Woodland buffer zone at the perimeter of the site helps in maintaining and creating a self-contained site, which maintains the character and setting of the AGLV.*
- *The reduction in 'sky-glow' by the proposed car park, as set out in the accompanying lighting assessment and section 5, mean that the proposed can park will significantly reduce sky-glow', with proposed fittings providing 100% downwards output, in comparison to the existing fittings which provide largely upwards light. The new lighting system will also allow for the top deck lights to be turned off over-night. This will enhance the setting of the AGLV and the countryside and enhance the openness of the Green Belt during dusk and darkness. This will also lead to further ecological enhancements, reducing disturbance for nocturnal animals.*
- *As part of the overall Master planning exercise for the campus it can be demonstrated that across the three applications there is an increase of 40% permeable hard landscaped areas over the existing non permeable hard landscaped area, and the proposed drainage will see a reduction in surface water run off from the site, improving on current conditions for the site and wider area.*
- *The application provides the Council with the opportunity to secure a sustainable Travel Plan for this important employment site in the Borough.*

The Travel Plan promotes sustainable modes of travel, including the provision of improved shuttle services and cycling facilities, which will have improvement on surrounding roads and for local residents and increase the sustainability of the site as a whole. This application provides a unique opportunity for the Council to ensure the future sustainability of this site.

- 6.14 A balanced assessment is therefore required between the harm to the openness of the Green Belt and any other harm whilst also understanding the needs of local business and the potential economic and highways implications which are all material planning considerations. Paragraph 80 of the NPPF states *'planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.'* The submission of the application has been made to prevent problems of cars being parked in the future on adjoining residential roads or even on the roads within the curtilage of the application site, neither of which would require planning permission, however could have a detrimental impact upon the visual amenities of the area and the residential amenities of the neighbouring roads. The Applicant has advanced the social, economic and environmental benefits of the proposal which further add weight in favour of the proposal. The harm to the openness of the Green Belt identified would be contained to the existing car park area of the site. Whilst increasing in height and spreading further across the site, finishing materials would be conditioned to ensure an appearance that would assimilate with the surroundings, avoiding a visually prominent addition. Lighting would be conditioned to result in a reduction in the existing light spill.
- 6.15 The additional development within the buffer zone of the ancient woodland would be in the vertical dimension, as well as the additional floor area by way of stairwell 1 and 2 and the western most part of the south extension to the car park
- 6.16 Taking the above into consideration when balancing the relatively minor harm to the openness of the Green Belt and any other harm by way of the encroachment into the ancient woodland buffer zone against the local policy and national policy support for proposals which contribute towards economic growth; the need for the proposed development and the potential jobs that would be created and secured; and the avoidance of off site parking demand on nearby streets, very special circumstances are cumulatively considered to be of sufficient weight to clearly outweigh the limited harm to the Green Belt and any other harm relating to the ancient woodland. As a consequence, the development would accord with Policy NHE5 of the Development Management Plan, Core Strategy Policy CS3 and the provisions of the NPPF in relation to Green Belt

Highway matters

- 6.17 A high number of the objection letters received raised objection on the basis of increase in traffic and congestion, hazard to highway safety and inadequate parking. The submission has been carefully considered by the County Highways Authority and following the receipt of addition and amended information, have provided the following comments:

'The proposed development has been considered by THE COUNTY HIGHWAY AUTHORITY who recommends an appropriate agreement should be secured before the grant of permission to include:

- 2. A financial contribution of £6150 toward auditing the travel plan reference FIML 2018 4119 TP06.*
- 3. The provision of a shuttle bus service from Tonbridge to Kingswood in accordance with details and timing to be submitted to and approved in writing with the local Planning Authority.*
- 4. A review of on street parking demand from Fidelity Kingswood on Green Lane, Chipstread Lane, Smithy Lane, and Beechan Lane from the date that staff are relocated from Kent up to a period lasting five years post full occupation in accordance with a methodology to be submitted to and approved in writing with the Local Planning Authority. If there is demand for car parking on these streets the developer is to fund and implement an appropriate Traffic Regulation Order to provide parking restrictions to mitigate such parking.*

In addition to the above agreement, the following conditions are recommended to be imposed:

- 1. No part of the new car park shall be occupied for parking of cars unless and until a two metre wide footway has been constructed on the north side of Green Lane and a two metre wide footway has been constructed on the east side of the A217 Brighton to include tactile paving and dropped kerbs at the Green Lane junction with the A217 Brighton Road Road, plus a two metre wide pathway should be created within the central reservation of the A217 Brighton Road all as generally shown on the submitted plan numbered 2018 4119 009 Rev A.*

Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access, and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019.

- 2. No part of the new car park shall be occupied for parking of cars unless and until an appropriate bus shelter has been provided at both the north and south bound bus stops on the A217 as shown on the plan numbered 2018 4119 009 Rev A and in accordance with a scheme to be submitted to and approved in writing with the Local Planning Authority.*

Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other

highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access , and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019.

- 3. No part of the new car park shall be occupied for parking of cars unless and until appropriate gateway features at the locations shown on the submitted plan numbered 2018 4119 013 Rev A and associated carriageway markings have been provided at the speed limit change on Chipstead Lane in accordance with a detailed scheme to be submitted to and approved in writing with the Local Planning Authority.*

Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access , and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019.

- 4. No part of the new car park shall be occupied for parking of cars unless and until the A217 close to the junction with Smithy Lane and Buckland Road has been resurfaced, and provided with anti skid surface and existing road markings have been refreshed all as as generally shown on the submitted plan numbered 2018 4119 009 Rev A.*

Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access , and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019.

- 5. The proposed car park shall not be occupied until the spaces have been provided in accordance with the approved plans. Thereafter the parking spaces shall be retained and maintained for their designated purposes.*

Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access , and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019.

- 6. Construction Transport Management Plan (* Note: Notice in writing must be given by the Local Planning Authority to the Applicant that if planning permission is granted this condition is intended to be imposed, or pre-authorisation from the applicant must be sought before recommending the imposition of this condition. The Validation requirements for planning applications needing the submission of a Construction Management Plan will provide this notice.)*

No development shall commence until a Construction Transport Management Plan, to include details of:

- (a) parking for vehicles of construction site personnel, operatives and visitor and staff of Fidelity International.*
 - (b) loading and unloading of plant and materials*
 - (c) storage of plant and materials*
 - (d) programme of works (including measures for traffic management)*
 - (f) HGV deliveries and hours of operation*
 - (g) vehicle routing*
 - (h) measures to prevent the deposit of materials on the highway*
 - (i) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused on Green Lane, Smithy Lane and Chipstead lane.*
 - (k) on-site turning for construction vehicles*
- has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.*

Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy DES8 Construction Management of the Reigate and Banstead Local Plan Development Management Plan September 2019.

- 7. The submitted travel plan numbered FIML 2018 4119 TP06 shall be implemented upon occupation of the car park and for each and every subsequent occupation of the development, thereafter maintain and develop the travel plan to the satisfaction of the Local Planning Authority.*

Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and the Reigate and Banstead Core Strategy 2014 Policy CS17 (Travel Options and Accessibility).

- 8. The car park hereby approved shall not be occupied unless and until a minimum of 33 of the available car parking spaces are provided with a fast charge socket (current minimum requirement: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply) in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.*

Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access, and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019 and Reigate and Banstead Core Strategy 2014 Policy CS17 (Travel Options and Accessibility).

- 9. The proposed car park shall not be occupied until a Car Park Management Plan which aims to restrict the numbers of staff driving to the site, and*

ensures the car park operates efficiently and prevents overspill parking from the proposed parking areas .has been submitted to and approved in writing with the Local planning Authority. The approved Car Park Management Plan shall be implemented upon first occupation of the proposed car park.

Reason: The condition above is required in order that the development should no prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access , and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019.

Informatives

1. The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works on the highway will require a permit and an application will need to submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see: <http://www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/the-traffic-management-permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see: www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/floodingadvice.

2. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).

3. Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.

4. Hinf27 It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Please refer to: <http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicle-infrastructure.html> for guidance and further information on charging modes and connector types.

Note

Fidelity International currently has an office campus on the Kingswood Field site in Kingswood, in the Borough of Reigate and Banstead. The site currently employs 1097 staff. Fidelity want to relocate around 539 positions from a site they have in Kent to their Kingswood site bringing the total employed there to about 1636 by the end of 2020. Fidelity plan employing additional staff up to 2025 when they anticipate 2200 people would be employed at the Kingswood Fields site. Neither the relocation nor recruitment requires planning permission. It is therefore entirely possible for Fidelity to simply relocate and employ more staff without extra car parking spaces. This would lead to demand for on street parking on the roads surrounding the site.

To mitigate this impact the developer has proposed a travel plan with flexible working from 0700h to 1000h to arrive at work and 1600h to 1900h to leave work. In addition, Fidelity is also proposing that people work more at home. Neither of those working practices are currently offered to Fidelity staff. These working practices in combination with the travel plan would have the effect of spreading the peak over two hours instead of one hour however the quantum of movements would be no worse in either of the two hours than there are currently over one hour, notwithstanding the increase in staff employed on the site.

In addition, Fidelity are proposing to increase the quantum of parking spaces on the site from 932 (Includes 399 spaces in a multi storey) standard spaces (a further 39 spaces are non-standard) to 1225 spaces (with a further 72 non-standard spaces), albeit with a smaller standard parking ratio than they currently have. This will reduce the current quantum of standard parking spaces per member of staff from the current 0.85 space per member of staff to 0.74 space per member of staff initially after the relocation of staff from Kent in 2020 but reducing further to 0.56 space per member of staff by 2025 when Fidelity anticipate employing 2200 members of staff.

The site currently has 399 standard car parking spaces within a multi storey car park. The proposal includes redeveloping the multi deck car park to accommodate 326 more spaces. Fidelity will provide 500 temporary car parking spaces during construction because all of the 399 multi storey spaces would be unusable and so too would 101 surface parking spaces.

Fidelity is proposing 1610 desks on the site within a floor space of 12,077m². This is equivalent to one desk per 7.5 m². Nationally this ranges from about one desk per 6m² and one desk per 10m². So, the proposed desk space is reasonable. According to Fidelity the 1610 desks would remain the same up to and beyond 2015(sic) when 2200 staff would be working from their Kingswood site.

In order to encourage staff to work from home Fidelity is proposing to cap the quantum of desks to 1610 and the quantum of standard parking spaces to 1225. If more than 1610 staff wanted to work on the site, the quantum of desks and parking spaces would not accommodate that increase. It is

therefore unlikely that more staff would arrive on site than could be accommodated at a desk or able to park their vehicle. Furthermore, staff are to be supported with a desk booking system so staff would know before leaving home whether they have a desk for that day. Otherwise a member of staff could arrange to work from home.

In the travel plan it is stated for the base year, which is what currently happens on the site and after taking account of relocated staff, that the proportion of Fidelity employees working from home would be 5.3% and the proportion of staff driving alone would be 81.3%. This would equate to 1271 vehicles if all of the 539 positions relocated from Kent involve staff that actually relocate with their jobs. Since Fidelity is proposing 1225 standard parking spaces the worst case under provision of parking spaces would 46 spaces. This could be accommodated within the site which is a large campus with an internal road network within which cars could be parked. However, in practice it is unlikely that all staff would want to relocate therefore the quantum of cars seeking a space to park would be less. According to the travel plan there is a target in year one of 15% of staff working from home and 78% of staff driving alone. This would equate to 1094 cars, which could be accommodated in the proposed 1225 standard parking spaces.

I have recommended a Section 106 requirement for Fidelity to amend their travel plan so that if it does not work as anticipated, then Fidelity would need to review on street parking demand from their Kingswood site on Green Lane, Chipstead Lane, Smithy Lane, and Beechan Lane for a period of up to five years post full occupation in accordance with a methodology to be submitted to and approved in writing with the Local Planning Authority. If there is demand for car parking on these streets the developer is to fund and implement appropriate parking restrictions.

In addition, I have recommended a condition for a car park management plan to restrict the numbers of staff driving to the site and ensures the car park operates efficiently and prevents overspill parking from the proposed parking areas.

Furthermore, I have asked for the developer to enter into a Section 106 Agreement to provide details on an extra bus service that Fidelity is proposing to provide to transport relocating staff from Tonbridge to Kingswood. Currently 17% of staff travel by sustainable modes of transport to the site in Kent. This equates to about 92 members of staff travel by sustainable modes of transport. This means that potentially this amount of staff could be using the proposed bus service. Fidelity would therefore need to provide a level of service that could accommodate this quantum of staff.

In addition, I have recommended a condition that the developer widens the footway to two metres on the north side of Green Lane and on the east side of the A217 Brighton Road. The condition would also require the developer to provide tactile paving and dropped kerbs at the Green Lane junction with the A217 Brighton Road and a formal path on the central reservation of the A217 close to the junction with Green Lane. Furthermore, the condition would

require the developer to provide a replacement shelter at the bus stop serving north bound services on the A217 and a shelter serving south bound services on the A217.

Notwithstanding the above there will be an increase in traffic which has been modelled. In order to model the impact of the proposed relocation, the developer has collected data on existing traffic flows. Data was collected from the Millfield Lane junction with Chipstead Lane, the Green Lane junction with Smithy Lane and the site access, the Smithy Lane junction with the A217 Brighton Road and at the Brighton Road junction with Chipstead Lane. This data was collected on 24 April 2018 outside of any school, and public holiday period. There were also no road works in the area during the data collection period. This data has also been used to distribute traffic for the proposed development, based on how current staff get to and from the site. For the relocated staff it has been reasonably assumed that those that would drive to the site would do so via the M25 and the A217. The data that has been collected is reasonable. It has been compared to traffic flow data that has been collected by SCC in 2011 and 2015 at those same junctions. This data has been compared to Department of Transport data from 2018 for the A217 south of Smithy Lane and it shows similar levels of traffic therefore the level of traffic using the local highway has been accurately recorded.

Most of the new traffic following the relocation of staff from Kent to Kingswood would be approaching the site at Kingswood via the M25 at junction 8 with the A217. This junction has not been assessed because the increase in flows under no travel plan would be negligible compared to existing flows. During the AM peak an increase 209 (an 11% increase in flows heading north) vehicles going north from the junction 8 and an increase of 3 vehicles (an increase of less than 1%) heading south toward the junction. During the PM peak the increase would be 16 vehicles heading north from the junction, this is an increase of 1%, and an increase of 157 vehicles heading south towards the junction, this is an increase 8% heading south.

The junctions that have been modelled include the A217 Brighton Road junctions with Chipstead Lane and Smithy Lane. The developer has also modelled the Millfield Lane junctions with Chipstead Lane and the Smithy Lane junctions with Green Lane. The model has been assessed to make sure it is robust. Initially the modelling work only took account of the AM peak between 0800 and 0900h. The developer was asked to include the hour between 0700 and 0800 because traffic flow data obtained from 24 April 2019 shows that there is a peak in traffic between 0700 and 0800h. The traffic flow data from 24 April confirms the peak in the evening peak is between 1700 and 1800 hours, which has been correctly modelled. The existing traffic flows from 2018 have been correctly grown by an appropriate factor to represent flows in 2019 from which to base existing traffic flows and grown again using another appropriate factor to show what traffic flows would be like by 2024.

Flow diagrams have been correctly presented to show the data that was collected in 2018. This was then grown again to show traffic flows in 2019 from which to assess the predicted traffic flows from the proposed

development. The traffic flows have been grown again to shows flows by 2024 without the development. Another diagram has been correctly presented to show the development flows by 2024 when the site is likely to be fully occupied with 2200 staff. These flows have been correctly added to the 2024 flows.

The modelling work has been correctly presented to show the 2019 base line and 2024 situation without the development and with the development during the hour of 0700 to 0800 hours and 0800 to 0900 hours. The largest impact of the development is likely to be on the southern approach to the A217 junction with Chipstead Lane. But even here the largest increase in queue length is likely to be about 10 metres which is just under two car lengths where the queue is already about 50 metres long by 2024 without the development. This is likely to be in the morning peak, which tends to have higher queues compared to the afternoon peak, according to the approved modelling work.

There are concerns locally with traffic speeds along Green Lane, Smithy Lane and Chipstead Lane. Speed data from SCC shows that drivers are only speeding on Chipstead Lane. There is no evidence of speeding on Green Lane or Smithy Lane, according to speed data SCC has. I have recommended a condition for the developer to install gate way features at the change in speed limit on Chipstead Lane, with associated carriageway markings indicating the speed limit too. This would make the change in speed limit to 30mph more conspicuous than it currently is.'

- 6.18 It is considered that the County Highway Authority have undertaken a full and thorough assessment of the transportation implications associated with the proposed development and their findings, which have been scrutinised by external parties, are not disputed by local planning authority Officers. Subject to the recommended conditions as detailed above and a S106 secured to provide the three requirements outlined, the proposal is considered acceptable in terms of highway matters.
- 6.19 Consultation with Highways England has also been undertaken. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). In this instance Highways England are interested in the potential impact that the development might have on the M25, in particular Junction 8 at Reigate Hill. The following comments have been received:

'Further to our email to you dated 27 November 2019, Highways England have been in discussion with the applicants and their agents and have reviewed various additional information that has been received from RGP, the latest on 10th April 2020, to understand the impact of this planning application on the strategic road network (SRN). The first imperative for Highways England is to ensure that our network is safe and reliable for all who use it.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the SRN. The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England are concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of this proposed development, Highways England are interested in the potential impact that the development might have on the M25, in particular Junction 8 at Reigate Hill.

You will be aware that Highways England had requested an assessment of the potential impacts of the additional car parking capacity upon the operation of M25 at Junction 8. To expedite the process, Highways England provided the applicant with a suitable transport model for this purpose. We have provided further advice and details of our modelling requirements to the applicant's consultant, RGP via a number of progress meetings and email correspondence. After several iterations, on 10th April 2020, Highways England were provided with a set of valid results for review (as detailed in the RGP Technical Note 10).

We are now content that the latest set of modelling results outlined in Technical Note 10 show various demand scenarios at M25 Junction 8, compared on a like for like basis. The results show the queue and delay effects of a number of flow scenarios associated with the development. The modelling adequately demonstrates that the additional traffic associated with the different scenarios will not in itself lead to additional safety or operational concerns for the M25 eastbound off-slip. However, the modelled results indicate potential increases in delays for the M25 westbound off-slip, ranging from an additional 12 seconds (Scenario 3) to approximately 50 seconds (Scenario 5) in the morning peak hour, when compared to a scenario without any additional development traffic.

It should be stressed that the modelling was not able to take into account habitual queuing and delay associated with the operation of the level crossing at Reigate Train Station, especially during the morning peak periods. This was beyond the capability of the modelling software. The modelling results are therefore relevant only to scenarios without any queuing back along the A217 southbound from Reigate to and through the junction.

We have considered the likelihood of each of the modelled flow scenarios in the assessment and any additional impacts from the A217(south, Reigate Hill) queues back into the junction. Our view is that with queuing back from the A217 (Reigate Hill) to or through the junction impedes the operation of the junction. When it does occur, any additional development traffic would have additional queue and delay impacts above those modelled, although without

further evidence we are currently unable to apply significant weight to this argument.

Highways England acknowledge that a Travel Plan has been provided by the applicant. In order to minimise the impact of the proposals on the M25 at Junction 8, which is already experiences heavy congestion during the peak hours, it is essential that the measures outlined within the Travel Plan are implemented and monitored by the nominated Travel Plan Coordinator, as set out in Section 8 of the document. The measures that are most likely to have an impact on the operation of the SRN are those associated with flexible working, home working, the provision of shuttle bus services and the complimentary bus service between Tonbridge station and the Kingswood site. Highways England therefore recommend that adequate on-going bus services are provided, with regular monitoring through staff travel surveys. Highways England expect to be an audit partner through the specified submission of the Travel Plan Monitoring Report, as set out in Section 8 of the Travel Plan. This is reflected in the recommended conditions within our formal response (attached). Highways England would expect this document to provide details on the complimentary buses between Tonbridge and Kingswood (including the frequency and the utilisation of the services) and updates on the flexible and home working polices. Should the applicant cease operation of the bus services, Highways England would expect to be consulted, with justification as to why they may no longer be required and the potential impact on the SRN.

Referring to the notification of a planning application dated 6th November 2019 referenced above, in the vicinity of the M25 that forms part of the Strategic Road Network, notice is hereby given that Highways England's formal recommendation is that we:

b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions)

The response should be considered alongside Highways England's covering letter, dated 5th May 2020.

This represents Highways England's formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Annex A Highways England recommended Planning Conditions

HIGHWAYS ENGLAND ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and

integrity. This response represents our formal recommendations with regard to 19/01176/F and has been prepared by the Area 5 Spatial Planning Team.

Condition 1

Adequate staff bus services as set out in the Travel Plan, and in particular the complimentary bus service between Tonbridge station and the Kingswood site (s 7.2.4 of Travel Plan) shall remain in operation for as long as required. This will be determined by implementation of the staff travel monitoring within the Travel Plan and the Monitoring timeline at s 8.3.3.

Reason: To mitigate any adverse impact from the development on the M25 junction 8 Reigate Hill. To ensure that the M25 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

Condition 2

In accordance with s 8.3.6 of the Travel Plan Highways England shall be an additional party to which the Travel Plan will be submitted for audit. That is at the end of year 1, year 3 and year 5 or whatever dates are agreed between the parties. Highways England will not charge an audit fee.

Reason: To ensure that the Travel Plan targets are being monitored and met or enhanced as stated at s 8.3.2 of the Travel Plan to manage demand on the M25 junction 8 at Reigate Hill. To ensure that the M25 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

- 6.20 The proposed conditions are recommended to be attached to a grant of planning permission.

Design appraisal

- 6.21 The proposed appearance of the car park would be functional in its design. The slope of the site would continue to be utilised and the tiered design of the existing car park would be followed in the new level added.
- 6.22 During the course of the application amendments were sought to remove the red finish to the car park and now the proposed finishing colour would be secured by condition to secure a muted tone, suitable to assimilate with the woodland surroundings. The proposal would include areas for planting that would soften and dapple the appearance of the development, integrating it within the rural setting. Timber and green walls are also proposed in part to the elevations.
- 6.23 The proposed development is considered acceptable in terms of its design and impact upon the character of the wider area, and complies with policy DES1.

Neighbour amenity

- 6.24 The proposed development would be contained within the central part of the site, generously separated from any neighbouring residential dwellings. The nearest neighbouring dwellings are those in Beechen Drive, approximately 160m to the north west. The proposal is therefore not considered to result in a harmful impact upon amenities of neighbouring residential properties in terms of overbearing, domination, loss of light or noise and disturbance.
- 6.25 A lighting condition would be attached to a grant of planning permission to ensure a reduction over the existing light spill from the site, offering an improvement to the visual amenities for local residents.

Ancient Woodland and Ecology

- 6.26 The existing car park sits within the 15m buffer zone of Ancient Woodland. The proposal would not result in the loss of any ancient woodland but there would be small increase in its footprint within the buffer zone. The site is further protected by way of a group Tree Preservation Order RE59. The area to the north and west of the car park is also designated a Site of Nature Conservation Importance.
- 6.27 Surrey Wildlife Trust (SWT) were consulted upon the application and during the course of the planning application additional information has been provided by the Applicant to address objections raised by SWT. In the latest comments received by SWT, objection is maintained. SWT state they *'refer the Council to the obligations of the National Planning Policy Framework which requires refusal of a planning permission if development will result in the loss or deterioration of ancient woodland. The above referenced letter from Arbtech Consulting Ltd suggests that mitigation for adverse impacts on the ancient woodland "could include improving the condition of the rest of the ancient woodland... creating a forest management plan". The letter proposes that "the creation of this document should be written into a planning permission". I welcome the proposal for submission of a woodland management plan, secured by planning condition, to contribute to the evidence of measurable biodiversity net gain across the development site as a whole and also to mitigate for adverse impacts to the ancient woodland such as temporary incursion from the temporary car park. However, the woodland management plan should be presented as part of a suite of measures to mitigate for biodiversity impacts and is not sufficient alone as compensation for acknowledged increased deterioration of the ancient woodland, as a result of development. I again refer the Council to the government's standing advice which states " Ancient woodland, ancient trees and veteran trees are irreplaceable. Consequently you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal."* The above advice was based on the misunderstanding of the number of trees to be planted at 5, whereas the total number is 105 and their revised comments in the light of this are awaited.
- 6.28 Natural England were consulted upon the proposal and raised no objection, stating "Based on the plans submitted, Natural England considers that the

proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.”

- 6.29 Taking the above into consideration and the application as a whole in balancing all matters for consideration, the proposal would result in some reduction to the amount of semi-natural habitats next to ancient woodland and the impact would not be as severe as the loss of ancient woodland itself or encroachment of new development into a pristine buffer zone. However, the proposal would result in public benefit by way of the economic benefits bought by the continued and increased intensity in the use of the site for commercial use. Furthermore, the car park extension is proposed in order to avoid off-site parking and harm to amenity of nearby roads including Chipstead Lane, Beechen Lane, Green Lane and Smithy Lane. These are largely residential roads and it is considered these roads would be most affected by increased demand for on street parking. Due to the limited impact and the substantial economic benefits, exceptional reasons are considered to exist in this instance.
- 6.30 Natural England Standing Advice refers to avoiding impacts, reducing (mitigating) impacts and compensation as a last resort. Avoiding impact is not considered possible in this instance as alternatives would result in equal or greater harm given the designations of the site and the siting of the existing multi-storey car park and surface parking which is bounded by Ancient Woodland.
- 6.31 Turning to mitigation methods, SWT have commented
- 6.32 *‘On the assumption that the above issues relating to ancient woodland are satisfactorily resolved prior to determination of the current planning permission, we also recommend the following;*

Sensitive lighting

The above letter from SJA Trees notes that the temporary external car park is to subject to exterior lighting provision. I therefore wish to reiterate comments provided in my email dated 7th January 2020 which remain valid; I recommend that a detailed lighting plan for the whole development site is therefore produced to demonstrate that artificial lighting will not adversely affect nocturnal species present within ancient woodland habitats adjacent to the development site. This plan should be submitted to the Council for approval in writing prior to the commencement of development. The plan should be written in consultation with a suitably qualified ecologist and have regards to best practice lighting guidance for avoidance of impacts on nocturnal species. Any external lighting installed on this development should comply with the recommendations of the Bat Conservation Trusts’ document entitled “Bats and Lighting in the UK – Bats and The Built Environment Series”. The above referenced Ecological Mitigation Plan by Arbtech Consulting Ltd provides appropriate recommendations with regards to external artificial lighting.

Biodiversity net gain

I note the submission of the above referenced Ecological Mitigation Plan by Arbtech Consulting Ltd and associated referenced Site Wide Biodiversity and Habitat Enhancement Plan. These documents present proposals for biodiversity mitigation measures across the development site as a whole. While being unambitious in terms of achieving a net gain ("net gain of 5 semi-mature trees overall"), I have evaluated these documents in conjunction with the above offered submission of a woodland management for specific enhancements of the site's ancient woodland. I can therefore advise that should the Council be minded to grant permission for this proposed development, that the development should be required to proceed only in strict accordance with the provision of the above referenced Ecological Mitigation Plan and Site Wide Biodiversity and Habitat Enhancement Plan. Ecological mitigation should have regards to the submission of an appropriately detailed woodland management plan (with details of management and financial security of the plan for the long term). The woodland management plan should be submitted to the Council for approval in writing prior to commencement of development.

- 6.33 In response to comments received from SWT, the Applicant has summarised their proposal for avoidance of damage, mitigation against damage and compensation for loss or damage.

'How the proposals avoid damage

- o Multiple schemes for the location of additional parking were reviewed at pre-app stage, and this was the least impact (both to woodland and greenbelt) area with minimal additional footprint, which represented no loss of ancient woodland and no damage as a result of construction, incursions by the proposals are minor in nature, in parts of the buffer zone which already contains development, and in the buffer zone only.*
- o During the planning process further design work was undertaken to reduce potential impacts on tree roots by reworking foundations. This work will continue post planning and form part of the construction management plan and tree protection plans secured via condition.*
- o The reduction of artificial light impacts with proposed lighting scheme create a reduction in light spill from the current car park/wider site, therefore providing an improvement on the current situation.*

How the proposals mitigate against damage

- o Improving the overall condition of the woodland with a formal management plan secured via condition in consultation with the Council, which will include removing of any invasive species, identifying any trees which require protection/management to prolong their life. This is something which is not currently in place and the ability to secure this as part of the applications will enhance the ancient woodland for the future.*
- o Additional very significant planting within the buffer zone and the wider site will improve the buffer zone effectiveness and preserve the ancient woodland longevity, as well as seeking to enhance the wider site as an extended 'buffer'.*
- o The continued use of the site for offices provides much less risk to the ancient woodland than if the site were redeveloped for residential use.*

How the proposals compensate for loss or damage

- o Site wide ecology and biodiversity improvements seek to enhance the biodiversity site wide over and above the existing situation.*
- o The net increase of 105 additional trees and all other landscaping measures across the site.'*

- 6.34 The submitted Site Wide Biodiversity and Habitat Enhancement Plan (BD 0210 SD 030 R03) proposes a net gain of 5 semi-mature trees overall, a net gain of 100 standard trees overall, 1135m² of new woodland planting, 1960m² of pollinator friendly and sensory planting, 45m² of new habitat beneficial to wildlife and invertebrates, 2770m² of species rich meadow in place of existing poor quality and species poor amenity grass, 11300 native bulbs, 455m² of green roof planting, 15 x bat boxes, 12 x bird boxes, 2 x hibernacula and invertebrate features and 2 x hedgehog houses.
- 6.35 Subject to recommended conditions to ensure a net gain in biodiversity, lighting details to be submitted and the securing of a woodland management plan, the proposal is considered to be acceptable in terms of impact on wildlife habitat.

Impact on trees

- 6.36 The site is covered in large parts by Tree Preservation Order RE59. The Tree Officer was consulted upon the proposal and carried out a desktop review of the arboricultural report and considered the loss of trees to facilitate the extension is not excessive and will not have an impact on the canopy cover within the application site.
- 6.37 A total of 43 trees would be removed as part of this proposal. This number comprises of 16 category B trees and 27 category C trees, 13 of which are within the 15m Ancient Woodland buffer zone.
- 6.38 There are three applications at the site. The proposed replacement pavilion application (19/01184/F) would see the removal of 7 trees, and the proposed landscaping application (19/01177/F) would see the removal of 12 trees. Over the three applications this would result in the loss of 62 trees in total.
- 6.39 The application includes the provision of planting of a total of 70 semi-mature trees, and 100 standard trees of mixed species and sizes. This results in a net gain of 108 trees.
- 6.40 The biodiversity and habitat enhancement plan (BD 021 SD 031 R) demonstrates a detailed planting scheme which includes diverse selection of specimen tree species, woodland planting and the creation of various habitats that will benefit the whole site. For example the woodland tree planting comprises twelve forest type trees ranging from heavy standards (3-3.5 m), extra heavy standards (4 metres) up to semi mature specimens (7 metres) once in place will provide immediate screening to the extended multi decked

car park and strengthen parts of the line of trees adjacent to the temporary car park creating a habitat corridor.

- 6.41 An amended site wide biodiversity and habitat enhancement plan and site wide outline planting plan have been submitted to provide the proposed tree planting and condition 2 (approved plans) includes these plans to secure the implementation.
- 6.42 The Tree Officer noted the incursion into the buffer zone is minimal and the nature of development i.e. non-residential and will mean there will be no significant damage to the ancient woodland as identified in the report e.g. fly tipping. predatory pets. The report has accepted there will be an increase in pollution from the additional cars using the facility and artificial light, although this has not been quantified. To compensate for the loss of the trees, increase in pollution and artificial light the landscape scheme must demonstrate how the replacement planting will enhance the ancient woodland. A woodland management plan would be secured by way of condition to improve its structure and increase ecosystems. A full tree protection condition would be attached to ensure protection of retained trees

Other matters

- 6.43 Objection has been raised on the grounds of impact upon air quality. The Council's Air Quality Officer was consulted upon the proposal and has raised no concerns over air quality at this site providing the Electric Vehicle charging spaces are put in. A condition is recommended to secure the provision of 33 electric vehicle charging spaces.
- 6.44 The site is not within nor adjacent to a Conservation Area and is not considered to result in a harmful impact in this regard.
- 6.45 Objection was raised on the grounds of inconvenience during the construction period. Whilst it is acknowledged there may be a degree of disruption during the construction phase, the proposal would not warrant refusal on this basis and statutory nuisance legislation exists to control any significant disturbance caused during the construction of the proposal. A construction method statement would be secured by planning condition. No significant health issues are considered to arise as a result of the planning application. Regard has been had to the Human Rights Act 1998.
- 6.46 Property devaluation is not a material planning consideration.
- 6.47 The site is located within Flood Zone 1 and a condition is recommended to secure details of surface water drainage
- 6.48 The parking is proposed for commercial use in connection with the existing use of the site and would not provide for community use of the site.

CONDITIONS

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason:

To comply with Section 91(1) of the Town and Country Planning Act 1990 as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

Plan Type	Reference	Version	Date Received
Other Plan	BD 0210 SD 030	R03	31.01.2020
Floor Plan	FKC-NHA-XX-02-DR-APL213	P02	24.12.2019
Floor Plan	751-NHA-XX-DR-A-PL212	P01	24.12.2019
Floor Plan	751-NHA-XX-DR-A-PL211	P01	24.12.2019
Floor Plan	751-NHA-XX-DR-A-PL210	P01	24.12.2019
Elevation Plan	FKC-NHA-XX-XX-DR-APL251	P01	01.10.2019
Elevation Plan	FKC-NHA-XX-XX-DR-APL250	P01	01.10.2019
Roof Plan	FKC-NHA-XX-XX-DR-APL230	P01	01.10.2019
Site Layout Plan	FKC-NHA-XX-XX-DR-APL001	P01	01.10.2019
Other Plan	2018/4119/012	B	21.11.2019
Other Plan	2018/4119/013	A	21.11.2019
Other Plan	2018/4119/009	A	21.11.2019
Elevation Plan	FKC-NHA-XX-XX-DR-APL300	P00	12.06.2019
Location Plan	FKC-NHA-XX-XX-DR-APL000	P00	12.06.2019
Section Plan	FKC-NHA-XX-XX-DR-APL261	P00	12.06.2019
Elevation Plan	FKC-NHA-XX-XX-DR-APL150	P00	12.06.2019
Elevation Plan	FKC-NHA-XX-XX-DR-APL151	P00	12.06.2019
Site Layout Plan	FKC-NHA-XX-XX-DR-APL101	P00	12.06.2019
Floor Plan	FKC-NHA-XX-00-DR-APL111	P00	12.06.2019
Floor Plan	FKC-NHA-XX-01-DR-APL112	P00	12.06.2019
Floor Plan	FKC-NHA-XX-B1-DR-APL110	P00	12.06.2019
Roof Plan	FKC-NHA-XX-XX-DR-APL130	P00	12.06.2019
Section Plan	BD 0210 SD 813	R02	12.06.2019
Section Plan	BD 0210 SD 812	R02	12.06.2019
Other Plan	BD 0210 SD 031	R00	31.01.2020

Reason:

To define the permission and ensure the development is carried out in accord with the approved plans and in accordance with National Planning Practice Guidance.

3. No development shall take place until the developer obtains the Local Planning Authority's written approval of details of both existing and proposed ground levels and the proposed finished ground floor levels of the buildings. The development shall be carried out in accordance with the approved levels.

Reason:

To ensure the Local Planning Authority are satisfied with the details of the proposal and its relationship with adjoining development and to safeguard the

visual amenities of the locality with regard to Development Management Plan 2019 policy NHE5.

4. No development shall take place above ground floor slab level until written details of the materials to be used in the construction of the external surfaces, have been submitted to and approved in writing by the Local Planning Authority, and on development shall be carried out in accordance with the approved details.

Reason:

To ensure that a satisfactory external appearance is achieved of the development with regard to Development Management Plan 2019 policy DES1.

5. No part of the new car park shall be occupied for parking of cars unless and until a two metre wide footway has been constructed on the north side of Green Lane and a two metre wide footway has been constructed on the east side of the A217 Brighton to include tactile paving and dropped kerbs at the Green Lane junction with the A217 Brighton Road Road, plus a two metre wide pathway should be created within the central reservation of the A217 Brighton Road all as generally shown on the submitted plan numbered 2018 4119 009 Rev A.

Reason:

The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access , and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019.

6. No part of the new car park shall be occupied for parking of cars unless and until an appropriate bus shelter has been provided at both the north and south bound bus stops on the A217 as shown on the plan numbered 2018 4119 009 Rev A and in accordance with a scheme to be submitted to and approved in writing with the Local Planning Authority.

Reason:

The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access , and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019.

7. No part of the new car park shall be occupied for parking of cars unless and until appropriate gateway features at the locations shown on the submitted plan numbered 2018 4119 013 Rev A and associated carriageway markings have been provided at the speed limit change on Chipstead Lane in accordance with a detailed scheme to be submitted to and approved in writing with the Local Planning Authority.

Reason:

The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy

TAP1 Parking, access , and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019.

8. No part of the new car park shall be occupied for parking of cars unless and until the A217 close to the junction with Smithy Lane and Buckland Road has been resurfaced, and provided with anti skid surface and existing road markings have been refreshed all as as generally shown on the submitted plan numbered 2018 4119 009 Rev A.

Reason:

The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access , and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019.

9. The proposed car park shall not be occupied until the spaces have been provided in accordance with the approved plans. Thereafter the parking spaces shall be retained and maintained for their designated purposes.

Reason:

The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access , and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019.

10. No development shall commence until a Construction Transport Management Plan, to include details of:

- (a) parking for vehicles of construction site personnel, operatives and visitor and staff of Fidelity International.
- (b) loading and unloading of plant and materials
- (c) storage of plant and materials
- (d) programme of works (including measures for traffic management)
- (e) HGV deliveries and hours of operation
- (f) vehicle routing
- (g) measures to prevent the deposit of materials on the highway
- (h) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused on Green Lane, Smithy Lane and Chipstead lane.

- (i) on-site turning for construction vehicles

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reason:

The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy DES8 Construction Management of the Reigate and Banstead Local Plan Development Management Plan September 2019.

11. The submitted travel plan numbered FIML 2018 4119 TP06 shall be implemented upon occupation of the car park and for each and every subsequent occupation of the development, thereafter maintain and develop the travel plan to the satisfaction of the Local Planning Authority.

Reason:

The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and the Reigate and Banstead Core Strategy 2014 Policy CS17 (Travel Options and Accessibility).

12. The car park hereby approved shall not be occupied unless and until a minimum of 33 of the available car parking spaces are provided with a fast charge socket (current minimum requirement: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply) in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

Reason:

The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access , and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019 and Reigate and Banstead Core Strategy 2014 Policy CS17 (Travel Options and Accessibility).

13. The proposed car park shall not be occupied until a Car Park Management Plan which aims to restrict the numbers of staff driving to the site, and ensures the car park operates efficiently and prevents overspill parking from the proposed parking areas .has been submitted to and approved in writing with the Local planning Authority. The approved Car Park Management Plan shall be implemented upon first occupation of the proposed car park.

Reason:

The condition above is required in order that the development should no prejudice highway safety, nor cause inconvenience to other highway users, and to accord with the National Planning Policy Framework 2019 and Policy TAP1 Parking, access , and Servicing of the Reigate and Banstead Local Plan Development Management Plan September 2019.

14. Adequate staff bus services as set out in the Travel Plan, and in particular the complimentary bus service between Tonbridge station and the Kingswood site (s 7.2.4 of Travel Plan) shall remain in operation for as long as required. This will be determined by implementation of the staff travel monitoring within the Travel Plan and the Monitoring timeline at s 8.3.3.

Reason:

To mitigate any adverse impact from the development on the M25 junction 8 Reigate Hill. To ensure that the M25 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

15. In accordance with s 8.3.6 of the Travel Plan Highways England shall be an additional party to which the Travel Plan will be submitted for audit. That is at the end of year 1, year 3 and year 5 or whatever dates are agreed between the parties. Highways England will not charge an audit fee.

Reason:

To ensure that the Travel Plan targets are being monitored and met or enhanced as stated at s 8.3.2 of the Travel Plan to manage demand on the M25 junction 8 at Reigate Hill. To ensure that the M25 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

16. No development including groundworks preparation shall commence until details have been submitted to and approved by the LPA in respect of a Woodland Management Plan (WMP). The details shall comprise of the woodland management operation, their scheduled timings and frequency. The WMP shall include details of the frequency of the review of the submitted WMP and the mechanisms for its future monitoring. The development shall be undertaken in strict accordance with the approved details.

Reason:

To ensure good arboricultural practice in the interests of the maintenance of the character and appearance of the area and to safeguard the Ancient Woodland (AW). The information supplied will accord with Industry best practice and standing national advice on the management and protection of AW and the policies NHE2 and NHE3 of the Development Management Plan 2019.

17. Prior to commencement of development, details of all external lighting, including proposed operating times and details of shielding to control light spill, shall be submitted to and approved, in writing, by the Planning Authority, and there shall be no variance in external lighting other than as approved.

Reason:

In the interests of the amenities of neighbouring residential properties and to ensure the protection of the protected species with regard to Development Management Plan 2019 policy NHE2 and Reigate and Banstead Core Strategy 2014 policy CS2, the NPPF and the Natural Environment and Rural Communities Act (2006).

18. The development hereby approved shall proceed only in strict accordance with the provision of the Ecological Mitigation Plan by Arbtech Consulting Ltd dated 8th January 2020 and Site Wide Biodiversity and Habitat Enhancement Plan no. BD0210 SD 030 R03', dated 8th January 2020, author BD Landscape Architects. The ecological enhancements as detailed shall be undertaken as required by the National Planning Policy Framework and Natural Environment and Rural Communities Act (2006).

Reason:

To ensure the protection of the protected species with regard to Development Management Plan 2019 policy NHE3 and Reigate and Banstead Core

Strategy 2014 policy CS2, the NPPF and the Natural Environment and Rural Communities Act (2006).

19. No development shall commence on site until an appropriately detailed landscaping and ecological management plan (LEMP) has been submitted to and approved in writing by the Local Planning Authority.

Reason:

To ensure the protection of the protected species with regard to Development Management Plan p2019 policy NHE2 and Reigate and Banstead Core Strategy 2014 policy CS2, the NPPF and the Natural Environment and Rural Communities Act (2006).

20. No development shall commence including demolition and or groundworks preparation until a detailed, scaled finalised Tree Protection Plan (TPP) and the related finalized Arboricultural Method Statement (AMS) is submitted to and approved in writing by the Local Planning Authority (LPA). These shall include details of the specification and location of exclusion fencing, ground protection and any construction activity that may take place within the Root Protection Areas of trees (RPA) shown to scale on the TPP, including the installation of service routings. The AMS shall also include a pre commencement meeting, supervisory regime for their implementation & monitoring with an agreed reporting process to the LPA. All works shall be carried out in strict accordance with these details when approved.

Reason:

To ensure good arboricultural practice in the interests of the maintenance of the character and appearance of the area and to comply with British Standard 5837:2012 'Trees in Relation to Design, demolition and Construction – Recommendations' and policy NHE3 of the Development Management Plan 2019.

21. No development shall commence on site until a scheme for the landscaping and replacement tree planting of the site including the retention of existing landscape features has been submitted and approved in writing by the local planning authority. Landscaping schemes shall include details of hard landscaping, planting plans, written specifications (including cultivation and other operations associated with tree, shrub, and hedge or grass establishment), schedules of plants, noting species, plant sizes and proposed numbers/densities and an implementation programme.

All hard and soft landscaping work shall be completed in full accordance with the approved scheme, prior to occupation or use of the approved development or in accordance with a programme agreed in writing with the local planning authority

All new tree planting shall be positioned in accordance with guidelines and advice contained in the current British Standard 5837:2012 Trees in relation to design, demolition and construction - Recommendations.

Any trees shrubs or plants planted in accordance with this condition which are removed, die or become damaged or become diseased within five years

of planting shall be replaced within the next planting season by trees, and shrubs of the same size and species.

Reason:

To ensure good arboricultural and landscape practice in the interests of the maintenance of the character and appearance of the area and to comply with policies NHE2 and NHE3 of the Development Management Plan 2019 and the recommendations within British Standard 5837.

22. The temporary car parking use hereby permitted shall be discontinued and the land restored to its former condition on or before 31 May 2021 in accordance with a scheme of works submitted to and approved in writing by the Local Planning Authority.

Reason:

To ensure that the temporary use is terminated within the specified time, having regard to policies NHE2, NHE3 and NHE5 of the Development Management Plan 2019.

23. No development shall commence until a scheme for the disposal of surface water drainage from the site has been submitted to and approved by the Local Planning Authority. The scheme shall be implemented as approved prior to the occupation of the dwelling hereby permitted.

Reason:

To ensure that the site is satisfactorily drained with regard to Development Management Plan policy CCF2 and National Planning Policy Framework 2019.

INFORMATIVES

1. Your attention is drawn to the safety benefits of installing sprinkler systems as an integral part of new development. Further information is available at www.firesprinklers.info.
2. The applicant is encouraged to provide renewable technology within the development hereby permitted in order to reduce greenhouse gas emissions.
3. Your attention is drawn to the fact that this permission is subject to a legal agreement the provisions of which should be complied with in full. A payment is required and there is a requirement to notify the Council in advance of commencement of development. Payment of **£6150** then becomes due.

On commencement of development, notice should be sent to the Planning Authority in writing or email to planning.applications@reigate-banstead.gov.uk advising that works have started. The sum described above is payable within a period of 28 days from commencement of development.

The development, once started, will be monitored by my enforcement staff to ensure compliance with the legal agreement and the conditions. Failure to pay the agreed infrastructure contribution will result in legal action being

taken against the developer and/or owner of the land for default of the relevant agreement.

4. You are advised that the Council will expect the following measures to be taken during any building operations to control noise, pollution and parking:
- (a) Work that is audible beyond the site boundary should only be carried out between 08:00hrs to 18:00hrs Monday to Friday, 08:00hrs to 13:00hrs Saturday and not at all on Sundays or any Public and/or Bank Holidays;
 - (b) The quietest available items of plant and machinery should be used on site. Where permanently sited equipment such as generators are necessary, they should be enclosed to reduce noise levels;
 - (c) Deliveries should only be received within the hours detailed in (a) above;
 - (d) Adequate steps should be taken to prevent dust-causing nuisance beyond the site boundary. Such uses include the use of hoses to damp down stockpiles of materials, which are likely to generate airborne dust, to damp down during stone/slab cutting; and the use of bowsers and wheel washes;
 - (e) There should be no burning on site;
 - (f) Only minimal security lighting should be used outside the hours stated above; and
 - (g) Building materials and machinery should not be stored on the highway and contractors' vehicles should be parked with care so as not to cause an obstruction or block visibility on the highway.

Further details of these noise and pollution measures can be obtained from the Council's Environmental Health Services Unit.

In order to meet these requirements and to promote good neighbourliness, the Council recommends that this site is registered with the Considerate Constructors Scheme - www.ccscheme.org.uk/index.php/site-registration.

5. The applicant is advised that the essential requirements for an acceptable communication plan forming part of a Method of Construction Statement are viewed as: (i) how those likely to be affected by the site's activities are identified and how they will be informed about the project, site activities and programme; (ii) how neighbours will be notified prior to any noisy/disruptive work or of any significant changes to site activity that may affect them; (iii) the arrangements that will be in place to ensure a reasonable telephone response during working hours; (iv) the name and contact details of the site manager who will be able to deal with complaints; and (v) how those who are interested in or affected will be routinely advised regarding the progress of the work. Registration and operation of the site to the standards set by the Considerate Constructors Scheme (<http://www.ccscheme.org.uk/>) would help fulfil these requirements.
6. The use of a suitably qualified arboricultural consultant is essential to provide acceptable submissions in respect of the arboricultural tree condition above. All works shall comply with the recommendations and guidelines contained within British Standard 5837.

7. The use of landscape/arboricultural consultant is considered essential to provide acceptable submissions in respect of the above relevant conditions. Replacement planting of trees and shrubs shall be in keeping with the character and appearance of the locality. There is an opportunity to incorporate substantial sized trees into the scheme to provide for future amenity and long term continued structural tree cover in this area. It is expected that the replacement structural landscape trees will be of Semi-Mature/Advanced Nursery Stock /Extra Heavy Standard/Heavy Standard size with initial planting heights of not less than 6m/4.5m/4m/3.5m, with girth measurements at 1m above ground level in excess of 20/25cm/16/18cm/14/16cm/12/14cm.
8. 1. The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see: <http://www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/the-traffic-management-permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see: www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/floodingadvice.
9. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
10. Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.

Hinf27 It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Please refer to: <http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicle-infrastructure.html> for guidance and further information on charging modes and connector types.

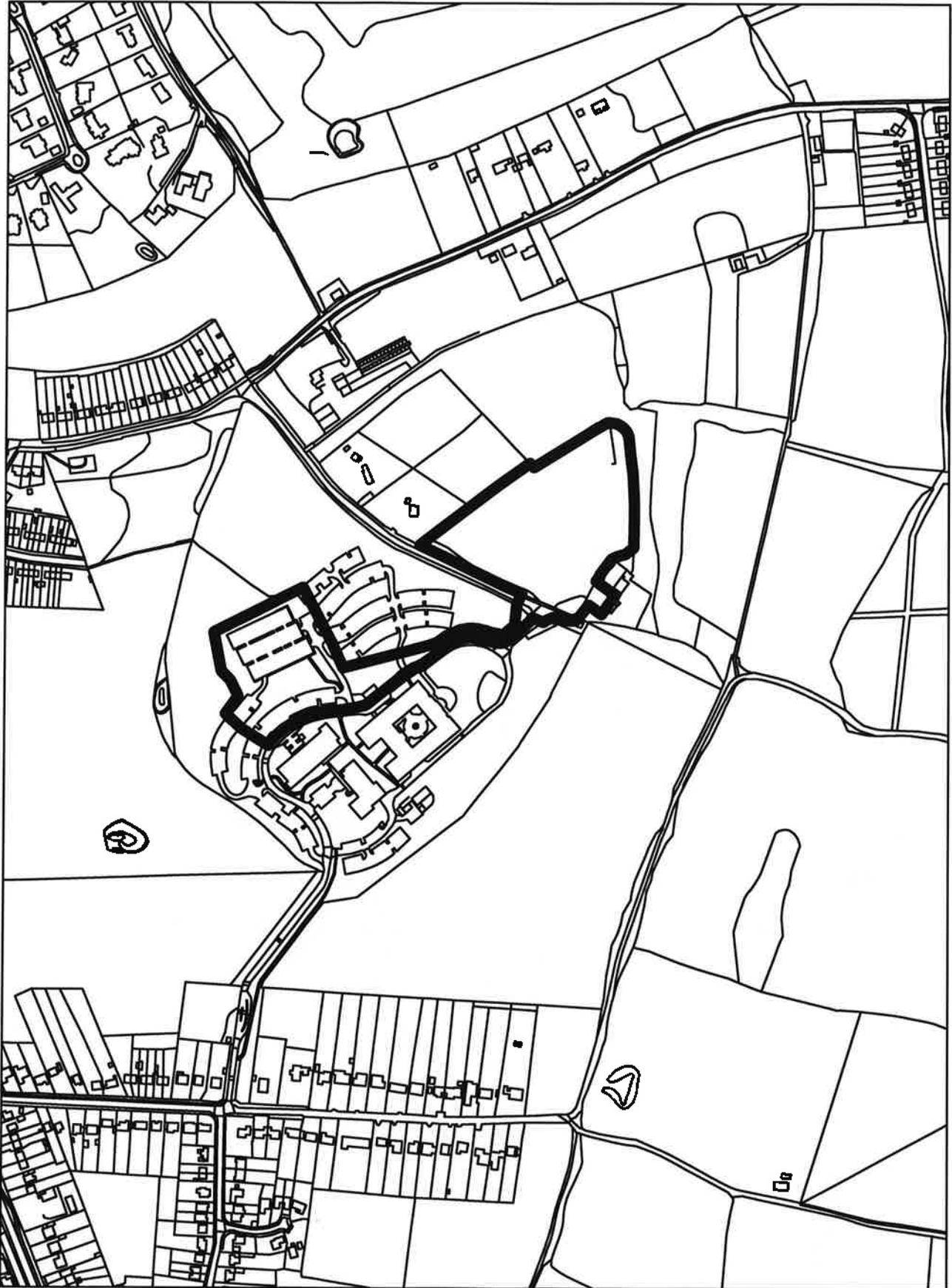
REASON FOR PERMISSION

The development hereby permitted has been assessed against development plan policies NHE1, NHE2, NHE4, NHE5, NHE9, DES1, DES8, TAP1 and material considerations, including third party representations. It has been concluded that the development is in accordance with the development plan and there are no material considerations that justify refusal in the public interest.

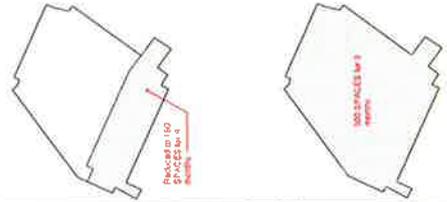
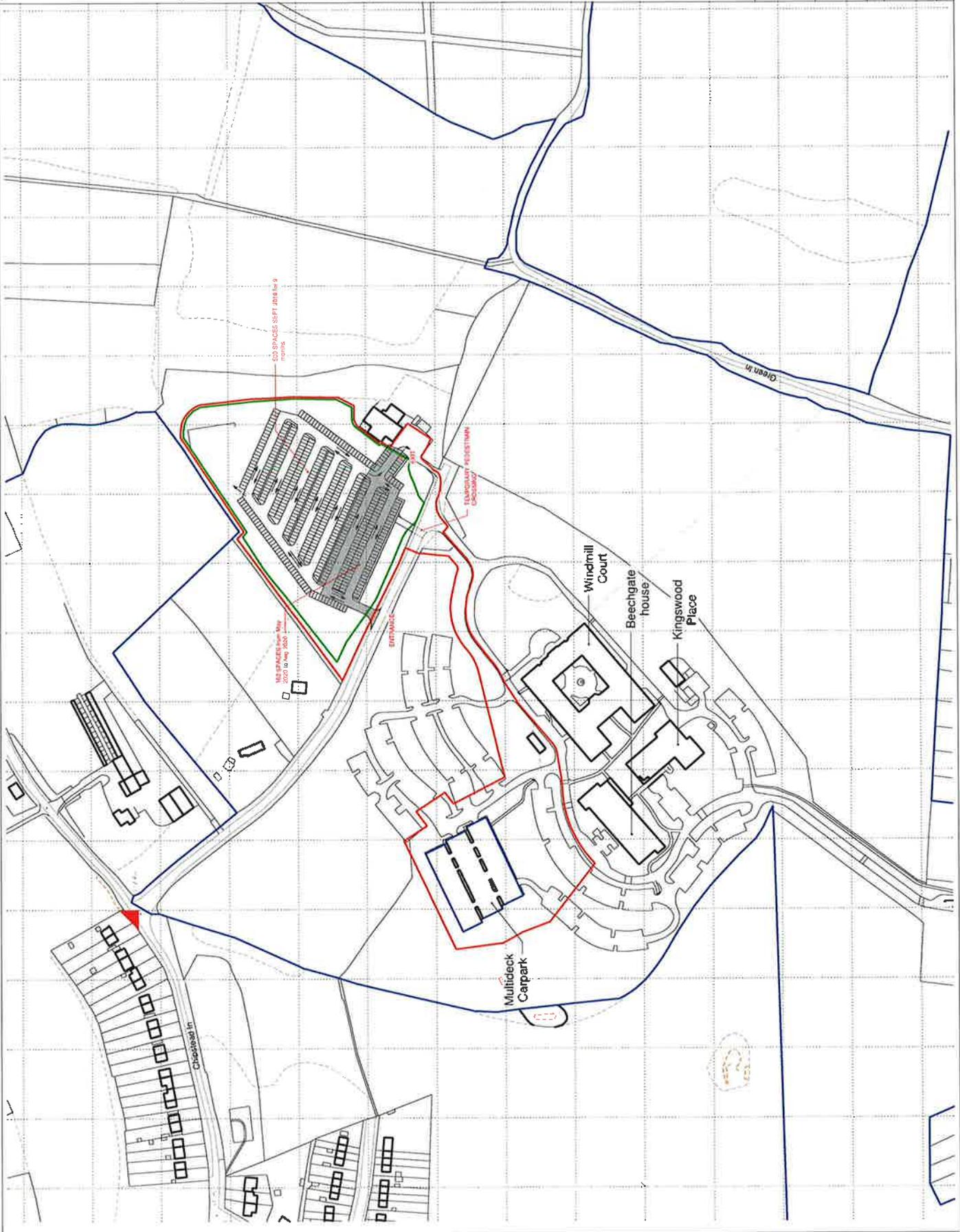
Proactive and Positive Statements

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 subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development where possible, as set out within the National Planning Policy Framework.

19/01176/F - Kingswood Fields, Millfield Lane,
Lower Kingswood



Ref: 2018/01/05 Planning Application
At: 2018/01/12 Planning Status



1 | Location plan temporary carpark
Scale: 1:1250



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1 Ramsey Court, Luton, MK1 1JL
Tel: 01582 319100
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www.nicholashare.co.uk

Approved Carpark Capex
Luton City Council
Luton City Temporary Parking

11/05/18 | REC-18-000003-03-A-11 | 001

1. Die Planung ist ein Entwurf und keine verbindliche Darstellung.
 2. Die Ausführung ist an die örtlichen Gegebenheiten und die jeweiligen Vorschriften zu binden.
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Item	Description	Quantity	Unit
1
2
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4
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9
10

1. Umkreis des Projekts
 2. ...
 3. ...
 4. ...

B **D**

1. ...
 2. ...
 3. ...
 4. ...

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Existing Section A-A
 Scale: 1:200 @ 4'

Oregonian Creek 14th
 MSCP
 Residential Access
 Oregonian eglonium beckeri carpet
 Main access to side entrance
 Low quality parking
 Air park spaces



Proposed Section A-A
 Scale: 1:200 @ 4'

New units medium trees and moderate wellflower planting in front of proposed multi-story car park
 Outdoor parking
 New heights for pedestrian access to campus and perimeter
 Air park spaces



Existing woodland

Existing street

Landscape buffer

External car park

Existing trees

Existing pedestrian crossing

Existing edge of the road low

Existing Section B
Scale 1:100 @ A1



Existing woodland retained

New trees retained
production of all planting

Proposed trees to be retained
production of all planting

New addition of street trees &
mitigation tree planting

Appointed pedestrian crossing

Existing fence retaining

High raised pedestrian crossing

Proposed new parking and vehicle turning area, sign

Proposed Section B
Scale 1:100 @ A1

