Shackleford Mushroom Farm
Shackleford, Surrey

Document 1: Planning Statement
(accompanying the revised application)

September 2009
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1.0 Introduction

1.1 This Planning Statement has been prepared in support of a revised detailed planning application for the redevelopment of the former Shackleford Mushroom Farm, Shackleford, Surrey, submitted by Wates Developments Limited.

1.2 The purpose of this Statement is to set out the justification for the proposed development in relation to relevant planning policies at national, regional and local levels and other material considerations. In particular, the proposed redevelopment of the Mushroom Farm site constitutes inappropriate development within the Green Belt and in these circumstances, it is necessary for the applicant to demonstrate that very special circumstances exist which justify the granting of planning permission as an exception to Green Belt policy. This Planning Statement sets out the circumstances that relate to the proposed development which, in the applicant’s view, amount to very special circumstances.

1.3 The planning application is supported by a range of technical and other documents in addition to the Planning Statement and upon which this Statement draws. These other documents are cross referenced in this Statement as appropriate and include:

Document 2  Design and Access Statement
Document 3  Statement of Community Involvement
Document 4a)  Transport Assessment - Volume 1
Document 4b)  Transport Assessment - Volume 2
Document 5  Report on Agricultural Uses on the Site
Document 7  Report on Alternative Development Potential
Document 8  Housing Needs Study
Document 9  Report on Provision of Affordable Housing
Document 10 Landscape and Visual Appraisal
Document 11 Ecological Assessment
Document 12 Tree Survey Report
Document 13 Arboricultural Development Statement Report
Document 14 Flood Risk Assessment and Drainage Strategy
Document 15 Foul Drainage Strategy
Document 16 Geoenvironmental Investigation Report
Document 17 Archaeological Desk Based Assessment
Document 18 Air Quality Report
Document 19 Noise Report
Document 20 Asbestos Survey Report
Document 21 Site Waste Management Plan
Document 22 Outline Environmental Management Strategy
Document 23 Construction Management Plan
Document 24 Framework Travel Plan
Document 25 DRAFT Section 106 Agreement
2.0 Procedural Matters

**EIA Regulations 1999**

2.1 The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (the EIA Regulations 1999), require that proposed development which, alone or in combination with another planned or proposed development, is likely to have significant environmental effects, shall be subject of environmental impact assessment (EIA).

2.2 To assist an applicant to establish whether a proposed development requires an EIA to be undertaken, Regulation 5 of the EIA Regulations 1999 makes provision for the applicant to submit a formal written request to the Local Planning Authority to establish whether, in the opinion of the Local Planning Authority, an EIA is required, (the Screening Opinion).

2.3 In accordance with Regulation 5, the formal screening opinion of Waverley Borough Council and Guildford Borough Council was sought by letter dated 5 March 2008, (Appendix 1). The letter sought the Screening Opinion of the two Local Planning Authorities in relation to proposed redevelopment of the Shackleford Mushroom Farm Site for up to 25 dwellings. The letter identified and described the site and surrounding area, the proposed development and the environmental sensitivity of the area, and it provided a preliminary assessment of likely significant effects based upon the characteristics of the development, its location and the characteristics of the potential impact(s). The letter was accompanied by the following information:

- Site layout plan
- Facilities and constraints plan
- Preliminary site layout
- Proposed layout superimposed on existing site layout
- Other information prepared for an earlier public consultation

2.4 The Screening Opinion of the two Local Planning Authorities in response to this request is set out in a letter from Guildford Borough Council dated 23 May 2008, (Appendix 2). This confirms that in the opinion of the two Local Planning Authorities, an EIA is not required for a redevelopment of the application site up to 25 dwellings.

**The Application Site Boundary**

2.5 This is shown on the plan at Appendix 3 to this Statement. It has been drawn to include the requisite visibility splays at the junctions of the two site accesses with Shackleford Road and Peper Harow Lane. A search of HM Land Registry title documents and of Local Highway Authority land ownerships has revealed that a small area of land close to the Peper Harow Lane access may not be in either the applicant's or Local Highway Authority's control. Therefore, the requisite notice has been published in the edition of the Surrey Advertiser dated 28th August 2009 as required by Article 6 of the Town and Country Planning (General Development Procedure) Order 1995. A copy of this notice is attached at Appendix 4.

**Other Land Controlled by Wates Developments Limited**

2.6 In addition to the application site, the applicant owns and controls two other parcels of land which adjoin the application site. These are:

a) Cyder House Field, an area of 2.70ha which lies immediately to the north of the application site and is used as open pasture by a tenant farmer. Part of the field, adjoining the Cyder House Public House, has been fenced off to form a children's playground, which is also owned by Wates Developments Limited.

b) The Cricket Ground, an area of 1.31ha which adjoins the application site to the south west. The Cricket Ground is used by Shackleford Cricket Club with the informal agreement of Wates Developments Limited. The land is occupied by a pavilion and cricket nets.
2.7 The tenancy of Cyder House Field constitutes an agricultural holding under Article 6 (6) of the Town and Country Planning (General Development Procedure) Order 1995. However, no part of the Field is included within the application site. Consequently, formal notice of the application has not been served on the tenant, although he has been notified informally in writing.

2.8 Shackleford Cricket Club has no legal interest in the Cricket Ground, but part of the Cricket Ground is included within the application site because of the ground remodelling and landscaping works proposed for this land. Accordingly and for the avoidance of doubt, formal notice of the application has been served on Shackleford Cricket Club.

Cross Boundary Development

2.9 The application site straddles the administrative boundary between Waverley Borough and Guildford Borough Councils. As a consequence, the proposed development falls to be considered by both Local Planning Authorities. The plan attached at Appendix 3 to this Statement illustrates the application site boundary and the administrative boundary.

2.10 In these circumstances, the planning application is formally submitted to both authorities, but the planning application fee is submitted only to the authority within whose administration the larger part of the application site falls. In the current case, this is Waverley Borough Council, (1.68ha of the application site lies in Waverley Borough and 1.40ha in Guildford Borough).

2.11 There are no regulations governing the procedure to be followed in such circumstances or how a decision on the planning application should be arrived at. However, custom and practice has established that the Local Planning Authority responsible for the larger part of the application site acts as ‘lead authority’ and, subject to consultation with the other authority, determines the planning application on behalf of both authorities.

2.12 Pre application discussions have taken place with planning officers representing both Councils and it has been agreed that the current application will proceed in accordance with custom and practice, i.e. Waverley Borough Council will act as the ‘lead authority’ and will, in consultation with Guildford Borough Council, determine the application.

2.13 Accordingly, the current planning application has been formally submitted to both Councils and the application fee paid to Waverley Borough Council.

2.14 In deciding whether to grant or refuse planning permission, it will be necessary to consider the application against the relevant saved policies of both Local Plans; the Waverley Borough Local Plan (2002) and the Guildford Borough Local Plan (2003). The two Local Planning Authorities have broadly similar policies, but it has been necessary to address both sets of policies in this Planning Statement.
3.0 Public Involvement

3.1 The involvement of the local community is vitally important to planning and the achievement of sustainable development. From the outset, Wates has recognised the importance of the application site to the local community and the vital part the local community should play in shaping its future.

3.2 The involvement of the local community has therefore been a key element of the wider process of engagement undertaken by Wates Developments in connection with the current proposals, which has enabled the community to influence the proposals as they have evolved. Full details of the extensive consultations undertaken by Wates Developments in preparation of the current application proposals are provided in the Statement of Community Involvement (Document 3).

3.3 The approach adopted by Wates Developments to public involvement in the process has been an inclusive one. The local community, whilst small and close knit, is made up of different individuals and organisations whose interests may differ. The extensive process of engagement and the variety of techniques used as part of the process have sought to ensure that as many individuals and groups as possible have been informed of the proposals and given the opportunity to participate in the process. Full details of the steps undertaken by the applicant to secure maximum participation in the process are set out in the Statement of Community Involvement (Document 3).

3.4 The measures undertaken by Wates Developments have enabled a clear and detailed picture of the needs and interests of the local community to be built up, in order that these can inform the proposals. In particular, four public exhibitions have been held in the local village hall, which were very well attended. The fourth public exhibition (of the revised application proposals for 18 dwellings) took place at Shackleford Village Hall on Friday 4th September and will be the subject of a supplement to the Statement of Community Involvement. Surveys of local needs and opinions have been undertaken in connection with these public exhibitions as well as a Housing Needs Survey, which was undertaken by Surrey Community Action, an independent organisation, in order to identify the nature of housing need in the local area (Document 8). Publicity about the proposals, the public exhibitions and the Housing Needs Survey, as well as the survey questionnaires themselves were circulated to every household in Shackleford and Peper Harow parishes, as well as businesses and organisations in the area.

3.5 In order to supplement the general level of information gathered through this process, specific steps have been undertaken to engage with key local stakeholders, including those groups and individuals who represent the local community and those who will be most directly affected by the proposals. These include:

- Shackleford Parish Council
- Representatives of Peper Harow Parish
- Owners and occupiers of adjoining land, including residents, the tenant farmer of Cyder House Field and Shackleford Cricket Club
- Aldro School

3.6 In addition, Wates Developments and its consultant team have engaged in extensive pre-application discussions with planning officers and housing officers in order to obtain advice and opinion on all aspects of the proposed development.

3.7 The information, opinions and advice received throughout the process have shaped the proposals as they have evolved and had a significant influence upon the submitted scheme. The role of public involvement and the way it has influenced the proposals is described in the Statement of Community Involvement, but some of the key outcomes of the engagement process were as follows:

- The importance of securing a permanent and sustainable future for the site.
- Concern over the future cohesion and vitality of the village and the future of local services and facilities especially the shop/post office, playground and bus service.
- Inclusion of a range of affordable and market dwellings to meet local needs and help sustain the local community.
• The importance of respecting and reinforcing local context, especially the prevailing landscape character and the setting and identity of Shackleford village.
• The need to integrate the site into the physical and social fabric of the area by improving public access into and through the site.
• Priority should be given to pedestrians over the car.
• The need to design to a low density and to respect the architectural character of the area and the use of materials.
• Removal of leylandii and supplement with native trees.
• Minimise light pollution, especially from street lighting.

3.8 It is the applicant’s view that the application proposals meet these needs and aspirations in a balanced and sustainable way.

3.9 The other key outcome of the engagement process is the high level of public support for residential use of the site. It is unusual for development proposals to gain support from a local community but in this instance, there is a clear recognition amongst the community for the need to redevelop the site and in the local context, there is broad acceptance that residential use is the best and most sustainable alternative.

3.10 The survey of local opinion conducted in connection with the second public exhibition in May 2008 showed that 92 percent of the local community supported the principle of residential use on the Mushroom Farm site. This represents a significant level of local support for residential redevelopment, which has been maintained thereafter. Notwithstanding the fact that 42 letters of objection were submitted in respect of withdrawn application WA/2009/0425 for 25 dwellings (itself a low level of objection given the local importance of the site and the high level of public awareness of the proposals), 31 objectors (74 percent) confirmed in writing their support for residential development on the site.

3.11 Given the particular and unique circumstances of the site and the generally negative attitude of other local communities towards development, we consider that the level of support shown towards the principle of residential use by the local community should weigh heavily in favour of the application proposals.
4.0 The Application Site

4.1 A full description of the application site, its location, use and appearance and its relationship with its surroundings are set out in the Design and Access Statement (incorporating Sustainability Assessment) (Document 2) and Transport Assessment (Document 4), submitted with the application. This section of the Planning Statement provides a summary description of the site and its location and then goes on to consider its previous and existing lawful use.

Site Description

4.2 The application site is an area of land totalling 3.08 hectares, lying between Peper Harow Lane and Shackleford Road, immediately to the South of Shackleford village. The site lies within the designated Metropolitan Green Belt and Surrey Hills Area of Outstanding Natural Beauty/AGLV.

4.3 The vast proportion of the application site comprises the former Shackleford Mushroom Farm, which ceased operating in February 2008. The Mushroom Farm site is roughly rectangular in shape, but includes two spurs of land projecting west and east to provide access to the site from Peper Harow Lane and Shackleford Road. These two access points are gated to prevent unauthorised access to the site when it was operational and remain gated since closure of the Mushroom Farm. As a consequence, there is no public access into or through the site.

4.4 In addition to the Mushroom Farm, the application site has been drawn to include a small area of land comprising the man made bund and leylandii, which separate the Mushroom Farm site from the Cricket Ground and an area of scrub vegetation, situated between the Cricket Ground and the Peper Harow Lane site access. This area has been included within the application site to facilitate access improvements and landscape enhancements. In addition, the application site includes two narrow strips of land alongside Shackleford Road and Peper Harow Lane. These are in the ownership of the Local Highway Authority and their inclusion within the application site is to demonstrate that the visibility splays necessary to provide safe highway access to the development are secured.

4.5 Prior to the establishment of the Mushroom Farm, the natural topography of the site was a shallow, dry valley running north to south, forming gently sloping land to the east and west falling towards the centre of the site. In parallel with the expansion and intensification of on site activities, the site has been substantially remodelled to reduce site levels and provide a more level surface for buildings and hardstandings. Therefore, site levels are considerably lower than much of the adjoining land and abrupt changes of level occur along the southern and north western boundaries of the site, marked by steeply sloping ground above large retaining walls. Most of the excavated material has been used to create the artificial bund which separates and screens the Mushroom Farm from the Cricket Ground, which is also supported on the Mushroom Farm by a large retailing wall. To provide additional screening of the Mushroom Farm site, leylandii are planted atop of the bund and also along the section of the northern site boundary to screen views from Glebe Farm.

4.6 The Mushroom Farm site itself is dominated physically and visually by built development and has the overall character and appearance of an intensely developed industrial site which is wholly out of keeping with its rural surroundings.

4.7 Its character and appearance results from a combination of factors:

- Size, scale and extent of buildings and structures;
- Austere and utilitarian appearance of the buildings arising out of their simple structural form, pre-fabrication, lack of detailing and fenestration, flat or shallow pitched roofs and the extensive use of functional, roughly finished building materials, including concrete, block work and steel;
- Presence of industrial type structures, including plant such as the boiler house, water treatment works and recycling tanks and associated high stacks and flumes;
• A network of pipework and ducting;
• Extent of hardstanding;
• Exposed blockwork retailing walls and artificial slopes around the perimeter;
• Lack of open space and soft landscaping within the site.

4.8 There is some softening of this harsh built environment resulting from the presence of woodland and other vegetation along the perimeter of the site, but this does little to diminish the overall impression of the site when viewed from within. Furthermore, the extent of physical enclosure and visual containment resulting from the natural and manmade screening around the site only emphasises the dominance of built development and the industrial appearance of the site.

4.9 A more detailed analysis of the site’s appearance is included in Section 2 of the Design and Access Statement (Document 2), and the Landscape and Visual Appraisal Report (Document 10).

The Surrounding Area

4.10 The application site is bounded to the west by the Cricket Ground, which is separated from the Mushroom Farm by an artificial bund and a line of Leylandii trees planted by the former owners of the Mushroom Farm. It is bounded to the south by extensive woodland formed by Shackleford Heath and the grounds of Norney Grange. To the east are the rear gardens of a group of detached houses fronting Shackleford Road comprising Burwood House, Fidlers Hall, Shackleford Cottage and Chalcotts. The current main vehicular access passes between the last two of these houses. These properties are well screened from the site by mature trees. To the north is the Cyder House Field and further detached houses fronting Peper Harow Lane. There is a second vehicular access from Peper Harow Lane formed between Glebe Farm house and the Cricket Ground.

4.11 Overall, the site is well screened with only limited short, medium and long distance views into the site. However, when viewed from within the site, the intensively developed and industrial appearance of the site is clearly apparent.

4.12 The analysis of the surrounding land use pattern set out in the Design and Access Statement (Document 2) establishes that the wider area around the application site is predominantly rural in character, comprising a mix of farmland and woodland, within which there are small hamlets and scattered housing. This pattern is characteristic of the Surrey Hills AONB. However, the application site itself is situated between Shackleford Village, a traditional linear village with its own unique character and identity which lies immediately to the north of the site and a substantial area of low density housing set within large plots which extends south east from the site up to Elstead Road and beyond to Norney.

4.13 As a consequence, Shackleford Mushroom Farm is not an isolated development set within an otherwise open and undeveloped countryside. In fact, the only open and undeveloped areas of land adjoining the application site are Shackleford Heath and Cricket Ground to the south and Cyder House field (which is itself an isolated field, largely surrounded by development) to the North. Therefore, in physical and land use terms, the Mushroom Farm site forms part of a continuous area of developed land which extends from and includes Shackleford Village in the north to Norney in the South. This land use pattern is illustrated on the plan on pages 66 and 67 of the Design and Access Statement and clearly threatens the separate identity and setting of Shackleford Village.

Location and Accessibility

4.14 The application site is located about 1.9km from the Hurtmore junction of the A3 and about 2.3km north of the B3001. The A3 forms part of the national trunk road network, providing good links to the centre of Guildford (approx. 10.6km) and the south coast towns. North of Guildford, the A3 links to the M25, which offers good access to Greater London and the national road network.
4.15 The B3001 provides good access to nearby towns and villages such as Farnham (11.8km), Elstead (4.8km) and Millford (4.3km). Elstead Road provides links to Hurtmore (1.5km), Farncombe (4.5km) and Godalming town centre (4.8km).

4.16 The application site is situated between Shackleford Road and Peper Harow Lane. These are local roads providing vehicular, pedestrian and cycle access north to Shackleford village and south to Elstead Road. Shackleford Road and Peper Harow Lane are currently laid out to a good standard, with an average carriageway width of 5.3m and 4.5m respectively. However, there are only occasional pedestrian footways or grass verges along these roads, so the road surface is shared for long sections.

4.17 The application site is in a good location for road links to both local and wider destinations.

4.18 Bus services to Shackleford village are provided by Stagecoach (No. 46 service), which runs every two hours and provides a service to Aldershot, Farnham, Godalming, Guildford and surrounding villages. Onward bus services to wider destinations are provided from these towns.

4.19 The location of the nearest bus stop to the application site is in Shackleford village, about 0.35km from the Peper Harow Lane site access and is, therefore, within easy walking distance of the site.

4.20 The nearest train station to Shackleford is at Godalming, approx. 4.5km from the application site and, therefore, within the suggested 5km for which cycling can replace other modes of transport. The station is served by South West Trains, which operate the service to London Waterloo and Portsmouth and is linked to other rail services via Guildford and Woking.

4.21 Pedestrian and cycle provision is primarily via the surrounding rural roads, although there is a network of bridleways and footpaths connecting Shackleford to the surrounding countryside, towns and villages.

4.22 The Transport Assessment submitted with the application sets out in detail the proximity of the application site to nearby towns and local service centres and the wide range of facilities which are accessible by walking, cycling or using public transport as well as by car.

Existing Lawful Use

4.23 Shackleford Mushroom Farm has a long history of agricultural use, which pre-dates the Planning Acts. A summary of the planning history of the site is set out in Appendix 5. Although the Mushroom Farm has ceased operating and the site is closed, its existing lawful use is agricultural.

4.24 The planning history associated with the site commenced in 1954 when a planning application for a bungalow at the then Shackleford Nurseries was approved. The description of the site as nurseries also accompanied a 1973 application for an agricultural worker dwelling. Nurseries are by definition agricultural use (Section 336 of the 1990 Town and Country Planning Act). All planning history post 1973 refers to the site as a mushroom farm, with subsequent applications approved to support an intensifying business operation. Further intensification has also taken place under agricultural permitted development rights. The gradual intensification came about as a result of the need to respond to international competition, changing environmental and production demands and legislative requirements.

4.25 The actual growing process took place in growing tunnels and buildings which occupy a surprisingly small proportion of the site. A large proportion of activities and associated buildings were required to support ancillary uses, which took place either in large utilitarian buildings or in the open. These activities included:

- Tray assembly
- Composting
- Chilling
- Picking
- Packaging
- Administration
- Sales
- Distribution
- Welfare, i.e. staff canteen

4.26 The largest proportion of the site was used for the manufacture of compost. The production process and the operations which previously took place are described in Appendices 6 and 7.

4.27 From the 1990’s up to the Farm’s closure in February 2008, mushrooms were sold to supermarkets in a competitive international market. In particular, the owners became increasingly reliant on one customer, Tesco, which suppressed the selling price of mushrooms but took some 80% of the crop. At this same time, environmental health legislation required increased investment in new plant and machinery, to comply with exacting environmental requirements associated with compost manufacture. As a consequence the owners found it increasingly difficult to compete due to constraints imposed on production by outmoded buildings and production processes, restricted size and topography of site and its poor access. Staff had to be bussed in from Slough, a significant overhead. The farm ceased to be viable and has now closed.

4.28 For the reasons described above, the Mushroom Farm site is intensively developed and is industrial in character and appearance, which belies its existing lawful agricultural use. A more detailed description of the character and appearance of the site and its physical and visual impact upon the surrounding area is contained in the Design and Access Statement (Document 2) and the Landscape and Visual Impact Appraisal Report (Document 10), submitted with the application. These demonstrate the considerable harm caused to the openness and character of the Green Belt and to the character and natural beauty of the Surrey Hills AONB / AGLV as a result of the scale of built development and activities associated with the existing lawful use of the site.

4.29 Whilst the Mushroom Farm was still operational, it gave rise to a variety of other impacts upon the local community and environment. This included noise, odours and high levels of HGV traffic which impacted upon the tranquillity and character of the rural area and upon the local community, thus adding to the unacceptable effects arising out of the use of the site for mushroom farming. These impacts are considered in detail in the Design and Access Statement (Document 2), Transport Assessment (Document 4) and the reports on Noise and Air Quality (Documents 18 and 19), submitted with the application. The assessments are based upon survey data obtained just prior to the close of the Mushroom Farm, when it was operating at substantially reduced levels and so do not give an accurate picture of the effects of the Mushroom Farm operating at normal or peak levels.

4.30 In summary, therefore, the use of the site as a mushroom farm had a significant harmful effect upon a range of interests of acknowledged planning importance.

Viability of the Existing Lawful Use

4.31 Notwithstanding the physical, visual and other effects of Shackleford Mushroom Farm, its use is considered by PPG2 : Green Belts, to be an appropriate use of Green Belt land and so, in principle, preferable to the application proposals. Therefore, in considering whether very special circumstances exist to justify the current proposals, it is necessary to establish whether there is a realistic prospect of the resumption of mushroom farming on the application site.

4.320 The applicant has commissioned an agricultural consultant, Mr. John Catt, BSC (Est Man) FRICS FAAV, to consider whether the resumption of mushroom farming on the site would be viable. His full report is submitted with the application, (Document 5). Appended to Mr. Catt’s report is a further report by Dr. John Burden, BSc. Ph.D, who is a specialist in mushroom farming and production. Read alone or in combination, these reports detail and catalogue the Mushroom Farm’s decline and eventual demise. They highlight the extensive measures resorted to by the previous owner to keep the farm operational and provide a clear demonstration that mushroom production based upon the existing site, buildings and production techniques is not commercially viable.
4.33 In his specialist report, Dr. John Burden provides a clear indication of what he considers would be required to make Shackleford Mushroom Farm viable in the current and foreseeable market place. He considers that this would only be achievable through the total redevelopment of the site and its significant expansion, together with the introduction of new production techniques, plant and machinery. In his view, only in this way would it be possible to increase productivity and reduce running costs to enable the Farm to compete with UK and international competitors. However, he points out that this would require investment totalling between £5 million and £8 million. In the light of low profit margins and return on investment, this is not a commercial proposition.

4.34 Dr. Burden’s report also highlights that to have any realistic prospect of being viable, the redevelopment and expansion of the Mushroom Farm required would lead to unacceptable environmental consequences. These would include:

- A significant increase in built development and a larger site area.
- A substantial increase in compost production with a resulting increase in odours.
- A significant increase in the number of staff vehicle movements and in the number and size of HGVs serving the site.

4.35 Since the redevelopment and expansion of the Mushroom Farm could not be undertaken under agricultural permitted development rights, planning permission would be required and on the basis of the likely resulting impacts, it is considered that this would not be forthcoming.

4.36 On the basis of the findings of the two agricultural specialists, we conclude that the resumption of mushroom farming on the site is not a realistic proposition. The implications of this conclusion are considered in detail in Sections 7 and 8 of this Planning Statement.

Viability of an Alternative Agricultural Use

4.37 Notwithstanding the most recent and specific use of the site as a mushroom farm, the existing lawful use of the site is agricultural, which covers the entire range of agricultural activities. Therefore, as with mushroom farming, it is necessary in the context of the current application, to consider whether there is a realistic prospect of an alternative agricultural use of the site taking place.

4.38 The two reports referred to above also consider the viability and / or environmental effects of other forms of agricultural use and reach the same overall conclusions in these regards. Mr. Catt’s report points out that:

“there are no soil based agricultural production processes which can be carried out on the site because the existing buildings and hardstanding cover almost all of the site. To introduce such process on the site would require the removal of all buildings and structures, de-contamination and / or removal of existing soils and the importation of top soils and fertilisers to return the soil to a quality necessary to support farming. Given the resulting value of the land and the low levels of return on this investment, this is not a financially viable option.” (Para. 5.1)

and he concludes that:

“The capital investment required to clear the site and return it to agricultural use and production with or without buildings makes such action an uneconomic proposition.” (Para. 6.2.3)

4.39 Subsequent to Mr. Catt’s report, it has been established that the cost of demolition and site clearance works alone i.e: without the importation of top soils and fertilisers, has been estimated to be upwards of £830,000. (Para. 3.26, Document 7).
4.40 Mr. Catt also considered the possibility of using the site and / or buildings for livestock or poultry production. He considers that:

"None of the buildings are suitable for housing livestock, whether cattle, sheep, pigs or poultry. Furthermore, the proximity of housing would make this an unpopular option with nearby residents." (Para. 5.2)

4.41 Dr. Burden reached a similar conclusion in respect of livestock farming as follows:

"Poultry could be reared in the buildings, but the relative small size of them would preclude economic flocks being raised and the smell to the local community would be worse than a very poor batch of mushroom compost." (Para. 8.4)

The Realistic Fallback Position

4.42 On the basis of the findings of the two agricultural specialists, it is considered that no agricultural use of the site would be viable and so there is no realistic prospect of an agricultural use of the site coming forward. Therefore, it must be concluded that the realistic fallback position against which the current application proposals should be considered is that without redevelopment, the site will remain unused. In these circumstances, the harm which is already being caused to the purposes of the Green Belt and its amenities and to the natural beauty of the AONB will be aggravated by the unacceptable consequences of long term disuse, progressive deterioration and eventual dereliction. The implications of this conclusion are considered in detail in Sections 7 and 8 of this Planning Statement.

Alternative Uses of the Site

4.43 The two reports by specialist agricultural consultants provide a clear demonstration that the existing lawful use of the application site, whether this is for mushroom production of an alternative agricultural use, is not viable and that there is no realistic prospect of an agricultural use of the site recurring in the future.

4.44 These reports were submitted to Waverley and Guildford Borough Councils in June 2008 so that they could be considered by planning officers as a part of pre-application discussions on the applicant’s proposals for the site. Whilst planning officers have not confirmed their acceptance of the reports’ conclusions, they requested that Wates Developments undertake and submit an assessment of possible alternative uses of the site as part of the evidence required to justify the application proposals. The relevance of this evidence and the weight it should be given in assessing the application proposals is considered in Section 8 of this Statement.

4.45 On the basis of the planning officers’ request for further information, Wates Developments has commissioned two reports which assess possible alternative uses of the site. These are:


4.46 The Hurst Warne report was produced by Maurice Johnson, a partner of Hurst Warne, who are local commercial property agents, involved, for example, in the marketing of the Federal Mogul site, a large employment site situated 1.9km from Shackleford Mushroom Farm.

4.47 The report assesses the potential use of the site for commercial purposes, i.e. those uses which fall within the Business Class of the 1987 Use Class Order, including B1 offices and light industry, B2 general industrial and B8 storage and distribution. It considers the prospects for:

i) The potential for conversion of existing buildings.
ii) Redevelopment of the site.
4.48 In relation to i), the report observes that the buildings on the site were purpose built for mushroom farming and so are not flexible or adaptable. Many of them are referred to as ‘dilapidated’ and most lack even basic services such as electricity, water, heating, foul drainage and WC facilities. The majority of buildings also have no natural light. The topography of the site is uneven and would prove difficult for commercial vehicles and the site layout is poor and makes sub division difficult. The report lists a range of health and safety hazards that would need to be addressed and would add to refurbishment costs.

4.49 It concludes in relation to the existing buildings that they would be of little or no attraction to commercial users in their current condition and that the cost of refurbishment would be totally uneconomical and, therefore, not worth consideration.

4.50 The report reaches similar conclusions on the prospect for redevelopment. It considers that the cost of redevelopment would be ‘extremely high’ and that site access and locational factors would result in extremely limited demand. In these circumstances, the report concludes that redevelopment is not an option which a developer would contemplate and that it is unlikely that funding would be obtainable from banks or other lending facilities.

4.51 Whilst the Hurst Warne report does not address the planning issues associated with reuse or redevelopment for business purposes, it should be noted that Paragraph 3.8 of PPG2 advises that the reuse of existing buildings in the Green Belt for commercial purposes would not constitute inappropriate development, provided certain criteria are satisfied. However, it is considered that these criteria would not be satisfied; firstly because the existing buildings are out of keeping with their surroundings due to their size, bulk and general design and secondly, because major or complete reconstruction would be required to render the buildings in keeping. This means that the reuse of buildings for commercial purposes would constitute inappropriate development in the Green Belt and would not comply with Local Plan Policies RD7 (Waverley) and RE9 (Guildford).

4.52 This means that a possible commercial use of the site, either through reuse or redevelopment, would represent inappropriate development within the Green Belt, which would require very special circumstances to exist if planning permission is to be granted. This issue is considered in more detail at Section 8 of this Statement.

4.53 Setting aside the planning issues, however, the opinion very clearly set out in the Hurst Warne report is that commercial use of the site is not a realistic proposition.

4.54 Following consideration of the Hurst Warne report by Planning Officers, the applicant was requested to undertake a further assessment of other possible alternative uses of the site, i.e. non business use. A list of such uses was drawn up on behalf of Wates Developments and following review and amendment by Planning Officers, was agreed as an appropriate basis for assessment. The list identified 25 possible alternative uses of the site. The assessment was undertaken on behalf of the applicant by Drivers Jonas and a report of the assessment was produced in October 2008, (Document 7).

4.55 The purpose of the assessment was “to assess the economic viability and planning acceptability of a range of alternative uses for the former Shackleford Mushroom Farm.” To undertake the assessment, the report states that Drivers Jonas drew upon its market knowledge and experience of the development industry, together with the views of other specialist agents in the industry to provide a comprehensive review of potential alternatives for the site.”

4.56 To provide a comprehensive assessment, Drivers Jonas analysed each potential use against a range of criteria which fell under the following categories:

- The site
- Location
- Economic Viability
- Planning
- Environmental
4.57 The report also set out to consider the potential for alternative uses arising out of the reuse or redevelopment of existing buildings. However, as the report points out, the costs of refurbishing the existing buildings would be in the region of £530 per square metre, and this figure excludes the costs of providing the necessary services and site reconfiguration that may be required. Drivers Jonas concluded that on the basis of high costs, together with access, locational and market considerations, a ready supply of other unfurnished premises and lack of local demand, the reuse of existing buildings does not present a viable option for the future use of the site.

4.58 Having rejected reuse, Drivers Jonas went on to consider redevelopment options. To enable them to undertake a rigorous assessment of economic viability, quotations were obtained for the preparatory works that are likely to be required as part of site redevelopment. These works include the demolition of existing buildings, excavation of concrete hardstandings and the removal of all demolition materials from the site. The cost of such works is estimated by Drivers Jonas to be upwards of £830,000. This figure excludes the cost of asbestos removal, ground modelling, land stabilisation, pile foundations or the importation of topsoils and fertilisers that may be required in association with the potential alternative uses of the site.

4.59 Any potential alternative use of the site would need to generate sufficient value to overcome these costs in order to bring development forward. Such abnormal costs would also impact upon the ability of many uses to raise funding for the development. This factor alone is sufficient in our view, to preclude the possibility of more open and less intrusive uses of the site because of their low income generating potential and higher financial risk profiles.

4.60 All other potential uses were assessed against the 5 criteria identified at Paragraph 4.54 above. In all cases, a combination of factors, including the site’s rural location, lack of proximity to markets and labour supply, lack of prominence and poor public transport accessibility and planning and transport constraints such as Green Belt / AONB policies, poor site access and traffic impact would prevent alternative uses from operating at a level necessary to generate sufficient value.

4.61 The Drivers Jonas assessment, therefore, supports the applicant’s view that there is no realistic prospect of an alternative, i.e. non residential use of the site coming forward, which is likely to be of sufficiently modest scale and impact to be acceptable in planning and transport terms.

4.62 In conclusion, Drivers Jonas are of the opinion that the site is likely to remain redundant, (Paragraph 5.7), and that the most suitable alternative use of the site in these circumstances is a low density residential development.

4.63 The implications of the Drivers Jonas assessment are considered in more detail in Section 8 of this Statement.

Planning History Post Closure

4.64 Since Wates Development acquired the Mushroom Farm site in June 2007 it has been engaged in preparing proposals for the redevelopment of the site. This process is fully described in the Design and Access Statement accompanying the planning application (Doc 2).

4.65 In March 2009, Wates Developments submitted a detailed planning application for the redevelopment of the site, comprising the demolition of existing buildings, structures and hardstandings and the erection of 25 dwellings (14 no. private market dwellings and 11 no. affordable dwellings), together with ground remodelling, open space, landscaping and access improvements (WA/2009/0425). In the light of comments and objections received, the application was withdrawn in June 2009, to enable Wates Developments to review and revise its proposals. The outcome of this process is the current revised application for 18 dwellings.

4.66 A comparison between the withdrawn application WA/2009/0425 and the revised proposals subject of the current application is set out in Section 8.0 of this Statement.
5.0 Relevant Policies

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the provision of the Development plan unless material considerations suggest otherwise. In the case of the current application, the Development plan comprises the South East Plan 2009, the Waverley Borough Local Plan 2002 and the Guildford Borough Local Plan 2003.

National Policy

5.2 PPS1: Delivering Sustainable Development. This guidance confirms that sustainable development is the core principle which underpins planning and sets out 4 key aims for sustainable development:

- Social Cohesion and Inclusion;
- Protection and Enhancement of the Environment;
- Prudent Use of Natural Resources; and
- Sustainable Economic Development.

5.3 PPS1 also sets out the Government Policy on design. Good design is indivisible for good planning and is a key element in achieving sustainable development. Therefore, local policies on design and access should be based upon the following key objectives which ensure that developments:

- Are sustainable, durable and adaptable and make efficient and prudent use of resources;
- Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including green and other public space) and support local facilities and transport networks;
- Respond to their context and create or reinforce local distinctiveness;
- Create safe and accessible environments;
- Address the needs of all in society and are accessible, useable and easy to understand by them; and
- Are visually attractive as a result of good architecture and landscaping.

5.4 PPS1 also sets out national policy on community involvement, which the Government considers is vitally important to planning and the achievement of sustainable development.

5.5 PPS2: Green Belts, states the general intentions of Green Belt policy, including its contribution towards sustainable development objectives. The specific purposes of including land within the Green Belt are:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns from merging into one another;
- To assist in safe guiding the countryside from encroachment;
- To preserve the setting and character of historic towns; and
- To assist in urban regeneration, by encouraging the re-cycling of derelict and other land.

5.6 Green Belt policy aims to achieve these 5 purposes by keeping land permanently open and PPG2 firmly establishes that the most important attribute of Green Belt is its openness.
5.7 In order to keep land permanently open, PPG2 distinguishes between appropriate development such as agriculture which helps to keep land permanently open, and inappropriate development, which by definition is harmful to Green Belt purposes because it involves build development which results in a loss of openness. Green Belt policy establishes a general presumption against inappropriate uses (Paragraph 3.1).

5.8 PPG2 also sets out the circumstances in which inappropriate development in the Green Belt may exceptionally be allowed. Paragraph 3.2 states:

‘Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to the Green Belt when considering any planning application or appeal concerning such development.’

5.9 Green Belt designation is also intended to achieve important land use objectives. These are:

- To promote opportunities for access to the open countryside;
- To provide opportunities for outdoor sport and outdoor recreation;
- To retain attractive landscapes and enhance landscapes;
- To improve damaged and derelict land around towns;
- To serve nature conservation interest; and
- To retain land in agriculture, forestry and related uses.

5.10 Additionally, Paragraph 1.7 makes it clear that the purposes of including land within the Green Belt are of paramount importance to the continued protection and should take precedence over the land use objectives.

5.11 Paragraph 3.15 also confirms that the visual amenities of the Green Belt should not be harmed by development by virtue of its siting, materials or design.

5.12 PPS3: Housing, sets out national planning guidance for housing which is intended to secure the following objectives:

- Building quality housing that is well designed and built to a high quality;
- A mix of housing, both market and affordable, to support a wide variety of household in all areas, both urban and rural;
- A sufficient quantity of housing taking account of need and demand and seeking to improve choice;
- Housing development in suitable locations which offer a good range of community facilities and with good access to jobs, key services and infrastructure; and
- A flexible, responsive supply of housing land, managed in a way that makes efficient and effective use of land, including reuse of previously developed land.

5.13 In order to achieve these objectives, PPS3 includes the following policy guidance:

i. Good design should contribute positively to the creation of sustainable, mixed communities. Design which is inappropriate in its context or which fails to take the opportunities available for improving the character and quality of the land and how it functions, should be rejected;
ii. Key characteristics of a mixed community are variety of housing, particularly in types of tenure, prices and mix of different households;

iii. Affordable housing should be provided for people unable to access or afford market housing, including key workers;

iv. LPA’s should set targets for the amount of affordable housing to be provided, which should take account of the likely economic viability of land for housing, risks to delivery, available finance and the levels of developer contribution that can reasonably be secured;

v. In providing for affordable housing in rural communities, where opportunities for delivering affordable housing are limited, the aim should be to provide high quality housing that contributes to the creation and maintenance of sustainable rural communities. This requires a positive and pro-active approach, which is informed by evidence;

vi. Housing should be provided in suitable locations in order to create mixed and sustainable communities. This should be achieved by making effective use of land. The priority for development should be previously developed land, in particular vacant and derelict sites and buildings;

vii. The need to provide housing in rural areas, including villages, in order to enhance or maintain their sustainability. This should include, particularly in small rural settlements, considering the relationship between settlements so as to ensure that growth supports informal social support networks, assists people to live near their work and benefit from key services, minimise environmental impacts and, where possible, provide environmental benefits;

viii. LPA’s should develop housing density policies to make the most efficient use of land, but these should have regard to a number of factors, including:

- Current and future level and capacity of infrastructure;
- Current and future levels of accessibility, particularly public transport; and
- The characteristics of the area.

5.14 PPS7: Sustainable Development in Rural Areas. This sets out national planning policy for rural areas, based on the 4 key principles of sustainable development identified in PPS1. The following elements of the guidance are considered to be of particular relevance to the current application:

i. Accessibility is a key consideration in all development decisions. Most developments which are likely to generate large numbers of trips should be located in or next to towns and other service centres accessible by public transport, cycling and walking;

ii. Priority should be given to the reuse of previously developed land;

iii. All development in rural areas should be well designed and inclusive, in keeping and scale with its location, and sensitive to the character of the countryside and local distinctiveness;

iv. In order to promote sustainable development and sustainable communities in rural areas, LPA’s should be aware of the circumstances, needs and priorities of rural communities. Where there is a lack of up to date robust information, LPA’s should consider commissioning surveys of needs, including local housing needs.

v. LPA’s should be supportive of small scale development in or next to rural settlements that are not designated as local service centres where this meets local business or community needs and maintains the viability of the community. In particular, this applies where development is the most sustainable option in villages that are remote from, and have poor public transport links, with, service centres.
vi. Development should facilitate healthy and diverse economic activity in rural areas;

vii. LPA’s should be supportive of proposals designed to improve the viability, accessibility or community value of existing services and facilities, eg: village shops and post offices, villages and church halls and rural public houses;

viii. It is essential that LPAs meet housing requirements in rural areas, based upon up to date assessment of local need. PPS7 recognises that this will involve some new housing in villages to meet identified local needs;

ix. Development should respect and, where possible, enhance the historic and architectural character of rural towns and villages, and

x. The conservation of the natural beauty of the landscape of nationally designated areas, including AONB’s should be given great weight, although adequate provision to meet the social and economic needs of these areas, including local housing need, should be made.

5.15 PPG13: Transport sets out national planning guidance in relation to transport provision and the relationship between land use and transportation. It recognises that by shaping the pattern of development and influencing the location, scale, density, design and mix of land uses planning can help to reduce the need to travel, reduce the length of journeys and make it easier and safer for people to access jobs, shopping, leisure facilities and services by public transport, walking and cycling (Para 3).

5.16 It also recognises that the car will continue to have an important role to play and for some journeys, particularly in rural areas, it will remain the only real option for travel.

Regional Policy

5.17 The South East Plan 2009 sets out the regional planning policies for the area. Together with the saved policies of the Waverley Borough Local Plan 2002 and the Guildford Borough Local Plan 2003, the South East Plan comprises the Statutory Development Plan for the area.

5.18 Policy SP3 of the South East Plan establishes that the prime focus for development in the South East should be urban areas in order to foster accessibility and avoid unnecessary travel. However, it also establishes the regional aim to achieve 60% of all new development on previously developed land, irrespective of whether this is within urban or rural areas. In addition, Paragraph 4.23 of the plan confirms that rural communities should be supported and protected. Planning policies must therefore balance the need to protect the countryside and retain the charm and heritage of the region’s smaller settlements whilst making sure that thriving and socially inclusive communities are maintained and developed.

5.19 Policy CCI confirms that the principal objective of the South East Plan is to achieve and maintain sustainable development in the region. To achieve this outcome, sustainable development priorities in the South East are to achieve sustainable levels of resource use, conservation and enhancement of the physical and natural environment, reduction of greenhouse gas emissions, addressing the inevitable impacts of climate change and achieving safe, secure and socially inclusive communities across the region.

5.20 In relation to climate change, Policy CC2 requires LPAs to adopt policies to mitigate and adapt to the effects of climate change and in particular, to help reduce the region’s carbon dioxide emissions. Policy CC3 promotes increased efficiency in the use of natural resources and Policy CC4 requires new development to incorporate sustainable construction standards and techniques.

5.21 Policy CC8 promotes the creation of sustainable and distinctive communities by encouraging development which will enhance the character and distinctiveness of settlements and landscapes and
which creates a high quality built environment, which promotes a sense of place, accessibility, social inclusion, environmentally sensitive development and crime reduction. In doing so, Policy CC5 requires LPA’s to have particular regard to meeting social needs including the needs of older people living independent lives in their own homes, access to services, communications and information technology and the provision of leisure, recreational and community facilities.

5.22 Policy RE3 requires planning policies to address the particular economic needs of rural communities and Policy RE5 promotes the use of ICT and new ways of working through the development of ICT – enabled sites and facilities suitable to support changing and flexible working practices and home based businesses.

5.23 Policy H3 stipulates that a substantial increase in the amount of affordable housing in the region will be delivered, based upon an overall regional target of 25% social rented accommodation and 10% intermediate affordable housing. In rural areas, affordable housing should be secured on small scale sites within or well related to settlements, including land which would not otherwise be released for development. Policy H4 encourages provision of a range of house types and sizes, with market housing reflecting the likely demand profile for household types and the size and type of affordable housing required and Policy H5 promotes high quality housing which reduces its environmental impact and respects local context, and is adaptable to life changes and changing lifestyles, such as the growing trend towards home working, which itself can have “considerable environmental impacts”.

5.24 Policy T1 promotes a rebalancing of the transport system in favour of sustainable modes, improved public transport in both urban and rural areas, development which is located and designed to reduce average journey lengths and measures to minimise the negative impacts of transport on the environment and communities. Investment in transport should support the regional spatial strategy by supporting development on urban areas and improving overall levels of activity.

5.25 Policy T2 promotes mobility management to achieve a rebalancing of the transport system in favour of sustainable travel modes, including improvements to the pedestrian and cycle network, local services and e-services to reduce the need to travel and changes in working patterns which alter the extent and balance of future demand for movement. Policy T5 promotes the use of travel plans to achieve sustainable transport objectives and Policy T6 promotes investment in ICT to reduce the need to travel.

5.26 Policy T7 promotes innovative, adaptable and community based transport measures in rural areas, but it is acknowledged at Paragraph 8.24 of the plan that the car will continue to provide the primary mode of travel in rural areas.

5.27 Policies NRM 4, 5 and 11 promote the use of sustainable urban drainage systems, the conservation and enhancement of biodiversity and development which is designed to secure energy efficiency and the use of renewable energy. The regional target is for new development to secure at least 10 percent of its energy requirement from decentralised, renewable or low carbon sources.

5.28 Policy C3 relating to Areas of Outstanding Natural Beauty states that high priority will be given to conserving and enhancing their natural beauty. In AONB’s the emphasis should be on small scale developments which are sustainably located and designed. Proposals which support the economy and social well being of AONB communities, including affordable housing schemes, will be encouraged, provided they do not conflict with the aim of conserving and enhancing natural beauty.

5.29 Policy BE5 states that LPA’s should plan to meet the defined local needs of rural communities for small-scale development. Paragraph 12.14 acknowledges that such development can address issues such as stagnation or exclusion, resulting from a loss of services or changing community structure.
Local Plan Policy

5.30 The cross boundary nature of the proposed development is such that the relevant policies of the respective local plans covering Waverley and Guildford Borough’s need to be identified and considered. The relevant policies of the Waverley Borough Local Plan 2002 and the Guildford Borough Local Plan 2003 are broadly similar in terms of their purpose and content and so this section of the Planning Statement considers the relevant policies together and identifies any marked differences between them.

5.31 Both Local Plans identify a number of strategic planning objectives for the two Boroughs, which vary slightly in emphasis, but can be summarised as follows:

1. To maintain and improve the quality of life without compromising the needs of the future generations by providing houses, jobs, infrastructure and services in a sustainable manner without undermining the built and natural environment.

2. To resist the urbanisation of the countryside.

3. To maintain and enhance the distinctive character of the area and its environmental assets, including natural and cultural resources.

4. To ensure that development minimises the consumption of non renewable resources and energy and does not create a demand for movement, infrastructure and services which cannot be met in a sustainable and environmentally acceptable manner.

5. To make provision for development, infrastructure and services which meets the needs of the local community in a way which minimises impact on the environment.

6. To achieve a healthy and diverse economy.

General

5.32 Both Local Plans include a number of general policies relating to new development which address the social and environmental implications of new development; namely:

- Location of development.

- Design, layout and quality of new development.

- Consumption of natural resources including energy and water.

- Compatibility of land uses and protecting the character, appearance and amenities of the area.

- Adequacy of essential infrastructure, including land drainage, public utility infrastructure, services and facilities.

- Movement, traffic, access and car parking.

- Accessibility, including access for persons with disabilities.

- Nature conservation.

- Safeguarding and enhancement of the landscape and existing natural features such as trees, hedgerows and water courses.

- Prevention of flooding.

- Crime prevention.
- Light pollution.
- Protection of open space, public views and roofscape.

5.33 These considerations are covered by Policies D1 - D13 of the Waverley Borough Local Plan and Policies G1 - G12 of the Guildford Borough Local Plan.

Planning Benefits

5.34 Policy D14 of the Waverley Borough Local Plan and G6 of the Guildford Borough Local Plan provide that where necessary to the grant of planning permission and in order to address a planning need arising from a proposed development, the Borough Councils will seek the provision of suitable environmental and / or community benefits. Such benefits may include:

a) The provision of affordable housing.
b) Improvements to public transport, walking and cycling facilities.
c) The provision of new or improved community, social and recreational facilities.
d) The provision of open space or recreational facilities, including children's play areas.
e) The enhancement of the natural and built environment, including the provision of public art.
f) Measures to mitigate or affect the impact of development on natural resources.

5.35 Such planning benefits may be provided on or off site, or alternatively through financial contributions and will normally be secured by Section 106 Planning Obligations.

5.36 More up-to-date policies in respect of planning benefits are to be found in Waverley Borough Council’s Planning Infrastructure Considerations SPD 2008 and Guildford Borough Council’s Infrastructure SPD 2006.

Green Belt

5.37 Policies C1 of the Waverley Borough Local Plan and RE2 of the Guildford Borough Local Plan reassert the distinction between appropriate and inappropriate development in the Green Belt and reaffirm the presumption against inappropriate development, except in very special circumstances. Policy C1 also states that any development which detracts from the openness of the Green Belt will not be permitted. Both policies identify development which is considered appropriate and confirm that affordable housing to meet local needs may be permitted as an exception to Green Belt policy, provided it accords with the relevant rural housing exception policy.

Surrey Hills Area of Outstanding Natural Beauty (AONB) and Area of Great Landscape Value (AGLV)

5.38 Policies RE5 of the Waverley Borough Local Plan states that the Surrey Hill AONB will be subject to rigorous protection and that development which does not conserve the natural beauty of the landscape will be resisted. Policy RE6 seeks to protect the distinctive character of the AGLV. Policy C3 of the Guildford Borough Local Plan seeks to protect and conserve the distinctive landscape character of the Surrey Hills AONB and the AGLV. Development will be expected to respect or enhance the landscape character of these areas and landscape enhancement will be encouraged.

5.39 Landscape enhancement is the subject of a separate Policy C6 in the Waverley Borough Local Plan, which states that the Council will seek to secure landscape enhancement.

Reuse and Adaptation of Rural Buildings

5.40 Policies RD7 of the Waverley Borough Local Plan and RE9 and 10 of the Guildford Borough Local Plan address the reuse and adaptation of buildings on rural areas. The policies allow for reuse and
adaptation, provided the building does not require reconstruction or enlargement, would not detract from the character and appearance of the countryside or the amenity or privacy of nearby properties, is in keeping with the area in terms of building design, size and use of materials, and does not generate traffic links likely to prejudice highway safety or cause harm to the character of country roads.

5.41 In the case of Policies RE9 and RE10, an additional set of policy requirements are laid out in respect of residential reuse of rural buildings to ensure that more suitable alternatives to residential reuse are given priority.

Natural Environment

5.42 Policies C11 of the Waverley Local Plan and NE4 of the Guildford Borough Local Plan seek to protect the ecological features of a site from development including the protection of any species of animal or plant or its habitat which benefits from statutory protection. Policy C11 also seeks to preserve and enhance the ecological value of sites.

5.43 Policies C7 and NE5 of the respect Local Plans seek to prevent the loss of trees, woodland and hedges which are characteristic features of the area or are of wildlife, historic or community value. Both policies may require the replacement of such features where they are lost.

Historic Environment

5.44 Policies NE5 of the Waverley Borough Local Plan and HE4 of the Guildford Borough Local Plan seek to resist development which would detract from the setting of a listed building by virtue of design, proximity or impact on significant views. Shackleford village is a designated Conservation Area and Policies HE8 of the Waverley Borough Local Plan and HE7 and HE10 of the Guildford Borough Local Plan seek to preserve and enhance the character and setting of conservation areas by:

- Securing the retention of buildings and other features such as walls, trees and hedgerows, which contribute towards the character of the Conservation Area.
- Require a high standard of design for any new development within or adjoining a Conservation Area.
- Restricting development which would adversely affect the character and setting of the Conservation Area, including the protection of open spaces and important views.
- Encouraging the removal of unsightly and inappropriate features.

5.45 In relation to archaeology, Policies HE14 and HE15 of the Waverley Borough Local Plan seek to protect archaeological heritage assets from new development by ensuring that development is preceded by an initial archaeological assessment of the site and that appropriate arrangements are secured for further evaluation monitoring, in situ retention and/or recording and storage of archaeological remains. Archaeology is not the subject of a policy in the Guildford Borough Local Plan, but similar requirements are set out in Paragraphs 11.39 to 11.46 of the Plan.

Housing

5.46 Policy H4 of the Waverley Borough Local Plan sets out the Council’s requirements in relation to the size and density of new dwellings. It requires that:

a) At least 50% of all dwelling units within the proposal shall be 2 bedrooms or less; and
b) At least 80% of all dwelling units within the proposal shall be 3 bedroom or less; and

c) No more than 20% of all the dwelling units in any proposals shall exceed 165 sq. metres in total gross floor area measured externally, excluding garaging.
5.47 In addition, the Policy states that the Council will promote the efficient use of land by encouraging proposals which provide 30 - 50 dwellings per hectare (net) and avoiding densities lower than 30 dwellings per hectare (net).

5.48 The basis for this policy is set out at Paragraphs 6.23 - 6.29 of the Local Plan. However, Paragraph 6.24 acknowledges that lower densities may be acceptable where development would otherwise be out of character with its surroundings and Paragraph 6.29 accepts that larger dwellings may be acceptable on small sites in locations where low density development is appropriate.

5.49 The density and size of new development is also the subject of supplementary planning guidance entitled Density and Size of Dwellings : Policy H4 of the Waverley Borough Local Plan 2002, adopted by the Council in October 2003. The SPG accepts at Paragraph 13 that exceptions to Policy H4 may be permitted where it could otherwise harm the character of an area. The SPG goes on to acknowledge that all development should be design led in order to make the ‘optimum’ use of the site with regard to:

- Local character and environmental constraints.
- The type and form of housing best able to achieve the requirements of Policy H4 whilst respecting local character.
- Accessibility to public transport and facilities.

5.50 Former Policy H10 of the Guildford Borough Local Plan also required that new housing development is at a density of between 30 and 50 dwellings per hectare net and that a density below 30 dwellings per hectare will not be permitted except where a higher density would have an unacceptably detrimental impact upon the character of the area. Proposals for lower density development will need to demonstrate that other planning considerations, such as topography, access, highway capacity, context, amenity and impact on the Green Belt clearly outweigh the benefits of higher density development. Former Policy H10 was not be applied at the expense of the quality of the existing environment.

Affordable Housing

5.51 Policy H5 of the Waverley Borough Local Plan states that the Borough Council will seek to negotiate the provision of at least 30% affordable housing within new developments which meet or exceed the following size thresholds:

i) In settlements over 3,000 population, development involving 15 or more dwellings or on sites of 0.5ha or larger; and

ii) In smaller settlements, development involving 5 or more dwellings or on sites of 0.2ha or larger.

5.52 In negotiating the nature and scale of affordable housing provision on individual sites, Paragraph 6.42 of the Local Plan states that the Council will take account of abnormal costs associated with the development of the site, the availability of public subsidy, the proximity of local services and facilities and access to public transport; and any other planning objectives for the site that need to be given priority.

5.53 At Paragraph 6.32, the Local Plan acknowledges that many local employers have difficulties in attracting and retaining a workforce.

5.54 Whilst Policy H6 relating to Rural Exemption Sites is not relevant, Paragraph 6.51 of the Local Plan recognises that very few development opportunities arise in rural areas which are large enough to include affordable housing. It is also recognised in Paragraph 6.52 that in exceptional circumstances Policy H6 allows for development on sites which do not adjoin rural settlements but are very closely related to them in character, appearance and location.
5.55 Policy H11 of the Guildford Borough Local Plan requires all residential development in urban areas of 15 dwellings or more or on sites of more than 0.5ha or more, shall include an element of affordable housing. These thresholds are reduced to 10 dwellings and 0.4ha in relation to development in settlements in rural areas, with a population of less than 3,000 persons. The Policy further indicates that the number of affordable units to be provided may vary according to site suitability, the need for affordable housing and any other material considerations.

5.56 Paragraph 5.50 of the Plan accepts that a 30% affordable housing target is the most that the Borough Council can hope to achieve. However, the policy requires that affordable housing should be dispersed within the scheme rather than concentrated in one place. The normal level of affordable housing to be provided has subsequently been increased to 35% by the adoption of the Guildford Infrastructure SPD in 2006.

5.57 Paragraph 5.56 of the Local Plan advises that the size and type of affordable dwellings should reflect the specific needs of households on the Borough’s Housing Register and should reflect the standards and requirements of the affordable housing provider.

5.58 Paragraphs 5.57 - 5.58 specify that the Borough Council will seek to put in place appropriate arrangements to secure affordable housing and to control occupancy. This may include occupancy criteria with some form of cascade mechanism to ensure the housing is provided to suitable occupants.

5.59 As with the Waverley Borough Local Plan, Paragraph 5.64 of the Guildford Borough Local Plan acknowledges the difficulty in meeting local housing needs in rural locations because of the high price of land and the shortage of development opportunities. Paragraph 5.66 acknowledges that there is a local housing need in most parishes of the Borough.

Movement

5.60 Both Local Plans have a policy relating to the location of developments which generate large numbers of trips to promote more sustainable travel patterns. These are Policy M1 of the Waverley Borough Local Plan and Policy G12 of the Guildford Borough Local Plan. Whilst Policy G1 does not specify what constitutes a large number of trips, Policy M1 defines this clearly in terms of major trip generating developments, i.e those which exceed the Institute of Highways and Transportation threshold which is based upon its guidelines for Traffic Impact Assessment. These thresholds are set out in Appendix 5 of the Waverley Borough Local Plan.

5.61 Policies M2 and G1 (2) of the respective Local Plans address the movement implications of development and seek to ensure that satisfactory and safe access is, or will be, provided for all travel modes, including walking, cycling and public transport.

5.62 Both Local Plans contain separate and specific policies requiring new developments to make provision for pedestrians and cyclists, (including cycle parking), to encourage alternative means of travel to the private car and to promote the use of public transport. These are Policies D4, M4, M5 and M10 of the Waverley Borough Local Plan and Policy M6 of the Guildford Borough Local Plan.

5.63 Policies M9 and G1 (4) of the respective Local Plans promote the provision of safe and convenient access to new developments for people with disabilities, including car parking provision.

5.64 Car parking is addressed by Policy M14 of the Waverley Borough Local Plan and Policy G1 (1) of the Guildford Borough Local Plan. Policy G1 (1) requires car parking provision to be in accordance with the parking standards set out in Appendix 1 of the Guildford Borough Local Plan, but Policy M14 states that car parking provision should be at a level appropriate to individual developments, taking account of:

i) The developer’s own requirements.

ii) The accessibility of the site by means of travel other than the private car.
iii) Guidance on maximum car parking standards.

5.65 Since the adoption of the two Local Plans, the normal maximum car parking standards applied by the two LPAs have been reviewed and are now as follows:

1 bedroom per unit : 1 car space  
2 bedrooms per unit : 1.5 car spaces  
3 or more bedrooms per unit : 2 car spaces  

Both Councils also require the provision of 1 cycle space per unit.

5.66 Policy M13 of the Waverley Borough Local Plan states that the Council will seek to minimise the effects of lorry traffic within the Borough by seeking to locate developments which generate HGV movements in areas where the highway infrastructures is capable of accommodating such movements and Paragraph 12.69 of the Plan acknowledges that country lanes are not designed for HGV traffic movements and will have a detrimental effect on safety and amenity. Policy G1 (2) of the Guildford Borough Local Plan requires that traffic generated by a development is compatible with the local highway network.

5.67 Policy G13 of the Guildford Borough Local Plan requires the submission and implementation of green travel plans in connection with specific types of development proposals and although the Waverley Borough Local Plan does not include such a policy, changes in planning policy at all levels require travel plans covering a range of sustainable transport initiatives to be included in most development proposals.

Community Provision

5.68 Both Local Plans acknowledge that community facilities are an important aspect of daily life which meet the day to day needs of residents and act as a focus for the community. Both Plans also acknowledge that many of these facilities are under threat and therefore include policies which seek to resist the loss of community facilities through development. However, there are no policies in either Local Plan to support or encourage the improvement of existing community facilities or to promote development which helps to maintain existing community facilities. It is also relevant to note that the list of community facilities worthy of retention in both Local Plans include schools, village halls and churches but do not include such facilities as local shops, Post Offices, pubs and other leisure facilities which support social cohesion and inclusion. Those policy issues relating to community facilities which are not covered by the Local Plans are addressed in other policy guidance, such as PPS7.

Open Space and Recreation

5.69 The importance of open space provision is acknowledged by both Local Plans, which recognise that open space serves the functional and recreational needs of residents as well as contributing towards the amenities of new development. In turn, recreation plays an important role in personal health, fitness and lifestyles and has a wider community role. Its importance is reflected in the objectives for recreation set out in the Guildford Borough Local Plan which seeks to:

i) encourage the provision of accessible recreational facilities in locations which relate well, in a social and physical sense, to existing communities.

ii) encourage the more efficient use of existing and new facilities.

iii) ensure that new residential development makes adequate provision for open space and other recreational facilities.

iv) support the use of the countryside for recreational purposes.
5.70 As a result, Policy R2 of the Guildford Borough Local Plan requires the provision of recreational open space in new residential development at a standard of 7 acres per 1,000 head of population, which is slightly in excess of NPFA standards. The corresponding Policy H10 of the Waverley Borough Local Plan does not identify a standard, but Paragraph 6.78 states that the Council will use the NPFA standard of 6 acres per 1,000 head of population as a basis for assessing the recreational requirements of new residential development.

5.71 Policy R2 of the Guildford Borough Local Plan and the supporting text to Policy H10 of the Waverley Borough Local Plan identify that new recreational open space should be provided in a variety of forms, ranging from formal playing fields to informal amenity areas, equipped children’s play areas (LEAP’s) and informal play areas (LAPs). Both Local Plans also require the open space within housing areas to be planned as an integral part of the development, in order to enhance the environment and be well related to the pedestrian networks linking other open spaces and facilities.

5.72 In relation to private amenity space, Policy H10 requires all dwellings to have access to a useable outdoor area. No minimum garden sizes are specified, but Paragraph 6.74 sets out a range of factors which need to be considered in relation to garden sizes.

Supplementary Planning Documents

5.73 In addition to the policies of the 2 adopted Local Plans for the area, both Councils have adopted Supplementary Planning Documents (SPGs and SPDs) to update or elaborate upon Local Plan policies.

5.74 Those SPGs/SPDs which are relevant to the current application are as follows:

Waverley Borough Council

Planning Infrastructure Contributions SPD (2008)

Guildford Borough Council

Open Space SPG (2002)
Guildford Car Parking Standards SPD (2006)

5.75 The policies and guidance set out in these SPGs/SPDs have been taken fully into account in the development proposals for the site and are referred to elsewhere in this Statement as appropriate.

Emerging Policy

5.76 Waverley Borough and Guildford Borough Councils are currently engaged in the preparation of Local Development Frameworks for their respective areas. Whilst the LDFs are at a relatively early stage of preparation and carry little weight in the consideration of the current application, they have been a valuable source of information and provide an indication of future policy, both of which have informed the application proposals.
6.0 The Proposed Development

6.1 The Design and Access Statement (incorporating Sustainability Assessment) submitted with the application provides a detailed description of the proposed development and of the design process which was undertaken to formulate the proposals (Document 2).

6.2 This section of the Planning Statement sets out a summary of the development proposals under the following headings:

- General Description
- Use
- Amount
- Layout
- Scale
- Landscaping
- Appearance
- Access

General Description

6.3 The proposed development comprises the redevelopment of a previously developed site. It involves the total demolition of all buildings, other structures and hard standings, site preparation including extensive ground remodelling and the erection of 18 dwellings in total. The new dwellings comprise 7no. affordable dwellings made up of, 3no. two bedroom houses and 4no. three bedroom houses; together with 11no. private market dwellings made up of 4no. 3 bedroom houses, 3no. four bedroom houses and 4no. five bedroom houses. Each dwelling unit has its own private amenity space and external space for cycle and refuse storage and dedicated car parking.

Use

6.5 The principal land use proposed is residential, but actual residential use (dwellings plus curtilages) will account for only 47% of the total site area. The remaining 53% of the site area will comprise recreational and other informal open space (35% of the total site area), access roads, the sewage treatment plant and structural landscaping (screening) which accounts for the remaining 18% of the site area.

6.6 In principle, a modest residential development is considered to be the most suitable use for the site for the following reasons:

- It will secure the greatest benefit to the Green Belt and AONB
- It respects and reinforces the prevailing land use and settlement patterns in the area, including the site’s proximity to Shackleford village and adjoining residential properties.
- The form and appearance of residential development is in keeping with the character of the area and has the potential to reinforce local distinctiveness.
- The contribution residential use makes to sustaining the local community by meeting identified housing needs and providing support for local services.
- The low levels of activity, including the traffic associated with residential development, is compatible with the surrounding area.

Use
• It helps to meet housing objectives by making effective and efficient use of brownfield land.
• Local support for residential use.

6.7 Whilst in principle there may be more suitable uses of the site, in practice, a modest residential scheme is able to deliver the greatest overall planning benefits whilst causing least harm to interests of acknowledged importance. It is, therefore, considered that the proposed development represents the best and most sustainable way of bringing this redundant agricultural site back into beneficial use.

Amount

6.8 The amount of development proposed is 18 dwellings. Whilst this comprises a mix of dwelling sizes, these dwellings, together with their garages, combine to make a total floor area of 4,273 sq metres gross external (3,315 sq metres gross internal excluding garages). The total footprint of these buildings is 2,419 sq metres (0.242 ha) which represents just 7.8 percent of the total site area. This is illustrated on drawing BM01.

6.9 The access roads and other hardstandings such as access drives, parking areas and paths total 4,275 sq metres (0.428 ha) (Drawing BM 02). Therefore, the total footprint of development proposed is 6,694 sq metres (0.669 ha), which represents only 21.7% of the total site area and means that 24,106 sq metres (2.410 ha) or 78.2% of the site will be open and undeveloped. This is illustrated on Drawing BM 03.

6.10 Of the 2.41 ha of undeveloped land, 1.08 ha (44.9%) is proposed to be communal and publicly accessible open space. This represents about 35% of the total site area. The central amenity space alone will comprise 0.715 ha, which is 23 percent of the total site area. This is illustrated on Drawing BM 04.

6.11 The resulting net residential density of the proposed development (based upon a site area of 3.08 ha and recreational open space provision of 0.715 ha) is 7.6 dwellings per hectare.

6.12 It should be noted however that net residential density is a measure of the efficient use of land and does not convey an accurate impression of the overall density and character of development, which is more accurately conveyed by the gross residential density and plot ratio of the proposed development. These figures are as follows:

| Gross Residential Density: | 5.84 dwellings /ha |
| Plot Ratio: | 0.078 : 1 |

Layout

6.13 The site layout has been conceived to achieve the following objectives:

(i) To extend the surrounding rural landscape into the site to re-establish continuity in the landscape and a predominantly open and rural character to the development, consistent with the site’s countryside location.
(ii) To create an informal and loose knit arrangement of widely spaced buildings set within a strong landscape framework which creates a sense of openness and allows the landscape character of the site to dominate over built form, and the buildings to blend in with their surroundings.
(iii) To secure a strong physical and visual break within the development, to restrict the spread of development across the site, and strengthen the separate identity and setting of Shackleford Village.
(iv) To provide permeability and legibility to the development, which promotes public access into and through the site.
(v) To create opportunities for informal recreation.

The underlying purpose of these objectives is to reflect and reinforce local distinctiveness.
6.14 The proposed layout is based upon a simple yet strong and legible structure, which comprises a substantial area of open space which occupies the central part of the site (the central open space), combined with an east-west movement corridor which provides public access into and through the site. The central open space extends along the two access lanes in a series of incidental roadside open spaces to improve legibility and to create a distinctive public real which reflects the character of the country lanes which run throughout the area.

6.15 The inclusion of large areas of open space within the development provides the opportunity to extend elements of the surrounding rural landscape into the site, notably the open character of Cyder House Field to the north and the woodland character of Shackleford Heath and Norney Grange to the south. This creates continuity in the landscape and assists in integrating the site and its buildings into the surroundings.

6.16 The additional benefit to the proposed layout is that it establishes a clear open break which restricts the spread of development across the site and combines with Cyder House Field to maintain the setting of Shackleford Village and separate it from the scattered, low density development along Shackleford Road and Grenville Road. Whilst this break performs an important function in reinforcing the separate and distinctive identity of the village, it also assists legibility and creates a central open space to the development which provides a focus for community activity and opportunities for informal recreation.

6.17 The small amount of development proposed relative to the total site area provides the opportunity to distribute the proposed dwellings across the site to create an informal and loose knit arrangement of buildings within a predominantly open and rural setting. The substantial area of landscaped open space, combined with the generous garden plots associated with the larger dwellings, enables the individual larger dwellings and groups of smaller dwellings to be widely spaced and allows for the larger dwellings to be set back into their plots, away from the roadside, enclosed and screened by hedgerow and woodland planting.

**Scale**

6.18 The proposed development exhibits considerable variety in the scale of buildings, in terms of their height, massing and proportions. Whilst the scale of buildings has been influenced by the objective of providing a range of accommodation to deliver a balanced community and meet identified local housing needs, regard has also been had to the height, massing and proportions of buildings in the local area, which exhibit considerable variation of scale.

6.19 The size of the smaller private and affordable dwellings range from 92 sq. metres gea to 214sq. metres gea. These have been combined to create 2 and 3 bedroom link detached dwellings or rows of terraced housing which in terms of the resulting scale are characteristic of the area.

6.20 The larger private houses vary considerably in scale and take the form of detached houses which are consistent in terms of scale with existing dwellings within the immediate vicinity of the site, such as Burwood House, Fiddlers Hall and the Old Rectory, as well as the scale of dwellings situated along Shackleford Road and Grenville Road. The detached houses vary in size from 240 sq. metres gross external area to 547 sq. metres gea, which is reflective of the differing sizes of detached housing in the local area.

6.21 In terms of building heights, all dwellings, except one which is two and a half storeys, are two storeys with pitched roofs. This is entirely consistent with the predominant height of buildings in the area. The scheme also contains single storey elements, which again is entirely consistent with the range of building heights in the surrounding area. Due to the deeper floor plates of 2 of the larger dwellings, the pitched roofs have been truncated to form small areas of flat roofing which are not visible from ground level. The purpose of this is to ensure that the ridge heights of these dwellings respect the tree line and do not punctuate the skyline in views from outside the site.
Landscape

6.22 The proposed landscaping of the new development is intended to have a significant influence upon its character and appearance, its impact upon the surrounding area and to achieve a high standard of visual and recreational amenity. Therefore, the objectives of the landscape strategy are to maximise the sense of openness and amenity within the site, reinforce local landscape character and distinctiveness, maintain and enhance the identity and setting of Shackleford village, create an attractive living environment, contribute towards social inclusion, improve biodiversity and provide for recreation and access.

6.23 In particular, the setting of the application site within the Surrey Hills AONB has been a fundamental consideration in formulating the landscaping proposals for the site, which are aimed at restoring some of its character and enhancing its contribution to the wider landscape.

6.24 As a result, the proposed landscape strategy incorporates the following main elements:

- **Restoration:** Remodelling the land form and reinstating the central part of the site to an open swathe of grassland, extending the open character of Cyder Close Field through the site and creating a visual and physical link to Shackleford Heath, which in turn creates an important open break in the development.

- **Conservation:** Retaining and protecting important existing trees and vegetation, especially native species or where existing vegetation performs an important screening function so that the visual impact of proposed buildings is minimised.

- **Enhancement:** Additional boundary planting is proposed to reinforce the existing boundary screening. The artificial bund and mature leylandii forming the existing boundary between the Mushroom Farm and the Cricket Ground is an alien feature in the landscape and so it is proposed to remove the leylandii, lower and re-grade the bund and replant with native species. Additional planting of woodland species will be undertaken within the central open space and on the incidental open spaces associated with the access lanes to extend the woodland character of Shackleford Heath and Norney Grange into the site and to provide continuity in the landscape.

- **Local Distinctiveness:** It is proposed to create a distinctive public realm to reinforce local distinctiveness and assist legibility by using elements of the surrounding landscape and public realm which are characteristic of the area. In particular, this involves the use of incidental open space along the access roads into the site, such as grass verges and shallow swales, an informal road layout with flush edges and no kerbing or separate footways and the predominant use of hedgerows to enclose the house plots and create a characteristic edge to the public areas of the site.

- **Management:** The proposals involve the clearance of scrub vegetation from the site and selective removal of alien species and their replacement with native planting. As part of the Environmental Management Strategy for the site, which is to be secured by a Section 106 Agreement, the site management company, which is to be set up, will have responsibility for managing the landscape within all of the public areas of the site in accordance with a detailed landscape management plan.

Appearance

6.25 In terms of visual appearance, the main objective underlying the development proposals is to preserve and enhance the character of the area by ensuring that the development is of a density, form and appearance which contributes towards local distinctiveness.

6.26 Whilst it is necessary to have regard to policies which seek to achieve the most efficient use of land, it is essential that the amount and density of development on the site is consistent with levels of development in the area and the character of the Surrey Hills AONB. In this context, the main factor
to consider is that the site is located on the periphery of Shackleford village, in an area characterised by low density development, where the landscape is the dominant feature. This contrasts with the higher density of development found within the village itself, which is largely responsible for its intimate character and closely knit settlement pattern.

6.27 The amount, layout and scale of development proposed will ensure that the buildings are sufficiently widely spaced to allow the established landscape and settlement pattern associated with areas outside of the village envelope to continue and ensure that the development does not diminish the distinctive character and appearance of the village.

6.28 The proposed dwellings comprise a wide range of house types, sizes and shapes, set within curtilages of varying sizes and shapes. These are dispersed randomly throughout the site to create a variety of apparently haphazard and unplanned relationships between them and with the intervening open spaces. This is illustrated on Drawing BM 05.

6.29 The proposed dwellings reflect the wide variety of building forms which appear locally, both within the village and in the surrounding rural areas. These include large, detached and smaller link detached houses and terraces. The use of link detached and terraced housing has enabled smaller 2 and 3 bedroom dwellings to be incorporated into the housing mix whilst maintaining the low density of development in keeping with the site’s location on the edge of Shackleford village and in the wider countryside.

6.30 The central open space has a strong visual influence throughout the development and reinforces the rural setting of the buildings. This is reinforced by additional tree planting, the use of hedgerows as the principle means of private enclosure and incidental areas of open space which are characteristic features of the countryside around Shackleford.

6.31 Buildings in the local area are generally in keeping with the “Surrey Style” of architecture and include many examples of buildings associated with the Arts and Crafts Movement. In order to retain this strong visual identity, the character of the area is extended into the proposed development by the use of architectural detailing and materials characteristic of the area. The importance of a limited palette of local quality materials, appropriately detailed within each building is evident in the area and is to be replicated within the development. The proposed materials are:

- Orange / red bricks
- Orange / red tile hanging
- Black timber weather boarding
- Render
- Exposed timber framing with rendered panels
- Orange / red plain roof tiles
- Stone detailing
- Timber detailing
- White and stained timber windows

6.32 The proposed elevational treatments and details are designed to reflect the Arts and Crafts and Surrey style influences in the area and are individually specified for each building. These architectural elements include roof forms and eave details, windows, doors, porches, walls, distinctive features, gutters, pipes and rainwater details, flashings, lighting, flues and ventilation, balconies, porches and garage doors.

6.33 The proposed development has been carefully designed to minimise the effects of domesticity and orderliness which are associated with residential use and, if left uncontrolled, could detract from the character and appearance of the development. The design steps taken and the control measures proposed to minimise these effects are set out in Section 8 of the Design and Access Statement (Document 2). As a consequence, it is considered that these aspects of the proposed development will not unduly affect the character and appearance of the area.
**Access**

6.34 It is proposed that the development will be served by two access roads, which will provide separate vehicular access from Shackleford Road and Peper Harow Lane to serve different parts of the development. The existing points of access off Shackleford Road and Peper Harow Lane will be improved to meet the requisite highway safety and turning requirements. Each access road will serve 9 dwellings in order that vehicular traffic can be dispersed safely and easily onto the local highway network.

6.35 Within the site, priority is given to pedestrians and cyclists. The two site access roads will be designed to Home Zone principles to secure low vehicle speeds and allow for shared use by pedestrians, cyclists and vehicles.

6.36 The central amenity space will provide a safe, vehicle free area for pedestrians. A pedestrian / cycle route across the central amenity space will be provided to allow movement across the site from Shackleford Road to Peper Harow Lane and designed to prevent vehicles from using the link.

6.37 A pedestrian only link is proposed to connect the site to Shackleford Heath via the Cricket Ground.

6.38 Each private market dwelling is provided with a double garage, which are oversized to provide cycle storage facilities.

6.39 Each affordable dwelling is provided with a single garage and surface parking space or 2 surface spaces. Each affordable dwelling has an external store with room for cycle storage.

6.40 The proposed development has been designed to provide safe and convenient access for persons with disabilities by avoiding steep gradients, abrupt level changes and obstacles such as street furniture and by providing appropriately surfaced routes throughout.
7.0 Analysis of Proposals

7.1 This section of the Planning Statement sets out an assessment of the application proposals against the main policy considerations.

Impact Upon the Green Belt

7.2 A key issue in relation to the current application is the impact that the proposed development will have upon the Green Belt. In Green Belt terminology, this is referred to as the “actual harm” caused by development as opposed to the harm caused by reason of inappropriateness.

7.3 In order to assess the impact, (or actual harm), of the proposed development upon the Green Belt, it is necessary to undertake a comparison between the effects of the proposed development upon the Green Belt and the effects of the application site upon the Green Belt should redevelopment not take place. The latter situation is known as the Fallback Position.

7.4 In normal circumstances, the Fallback Position for comparison purposes is the impact of the existing lawful use of the site upon the Green Belt. On this occasion, however, the particular circumstances relating to the site mean that the existing lawful use does not represent the true or realistic Fallback Position against which the proposed development should be judged. These circumstances are described in Section 4 of this Statement, which concludes that there is no realistic prospect of the existing lawful use being resumed, either in the form of mushroom production, or an alternative agricultural use.

7.5 Therefore, it is our view that the realistic Fallback Position against which the impact of the proposed development should be considered is a redundant agricultural site with no realistic prospect of reuse.

7.6 The implications of this conclusion are clear, in that it is not only necessary to consider the effects of the application site upon the Green Belt as they currently exist, it is also necessary to consider the long term consequences of disuse, i.e. the progressive physical and visual deterioration of the site and eventual dereliction.

7.7 Therefore, the actual harm or impact of the proposed development upon the Green Belt must be assessed against the realistic Fallback Position of a redundant site and the long term consequences of its continued disuse.

7.8 In terms of assessing actual harm, the principal issue to consider is the effect of the development upon the openness of the Green Belt, since openness is the main attribute of the Green Belt and underpins the 5 purposes which the Green Belt is intended to serve.

7.9 However, in assessing the actual harm (or outcome) caused by the proposed development, it is also necessary to take account of its effects upon other Green Belt interests, i.e. the Green Belt objectives for the use of land set out in Paragraph 1.6 of PPG2 and its effects upon the visual amenities of the Green Belt, (Paragraph 3.15).

7.10 A comparison between the effects of the proposed development and the effects of the Realistic Fallback position upon openness, the Green Belt objectives for the use of land and visual amenity is set out below.

a) Effects upon Openness

The physical effects of built development upon the openness of the Green Belt can be objectively measured by reference to its size. To that end, a detailed analysis of the size of existing and proposed development is set out in the schedules attached at Appendices 8 and 10 to this Statement.
Case Law has established that in relation to the openness of the Green Belt, size can be assessed in terms of floor area, footprint, extent, mass, height and, in relation to visual effects, prominence. Table 1 below sets out the respective impacts of the existing and proposed developments upon the openness of the Green Belt.

<table>
<thead>
<tr>
<th></th>
<th>Existing (m²)</th>
<th>Proposed (m²)</th>
<th>% Reduction</th>
</tr>
</thead>
<tbody>
<tr>
<td>Floor area of buildings</td>
<td>11,198</td>
<td>4,273</td>
<td>61.9</td>
</tr>
<tr>
<td>Footprint of buildings</td>
<td>11,198</td>
<td>2,419</td>
<td>78.4</td>
</tr>
<tr>
<td>Area of hardstanding</td>
<td>11,158</td>
<td>4,275</td>
<td>61.7</td>
</tr>
<tr>
<td>Extent of built development (buildings and hardstandings)</td>
<td>22,356</td>
<td>6,694</td>
<td>70.1</td>
</tr>
</tbody>
</table>

On the basis that the application site area is 3.08 hectares, this means that the proportion of the site covered in built development (site coverage) will be reduced from 72.6% to 21.7%. Of this, buildings currently occupy 36.4% of the site area. This will be reduced to just 7.8% as a result of the proposals. The overall result will be that 78.3% of the site will be open and undeveloped, compared with 27.4% currently. The effects of the proposed development on the openness of the site are illustrated on Drawings BM 01, 02 and 03.

With the exception of one dwelling with accommodation in the roof space, all of the proposed dwellings are restricted to two storeys in keeping with the general height of buildings in the area. The height of the tallest building (to ridge) will be 10.36 metres. This compares with the height of the tallest existing building of 7 metres. However, there are 4 other existing structures on the site, namely vertical flues or stacks, which are about 10 - 12 metres in height. Therefore, in overall terms, the proposed housing will be taller than the existing buildings on the site, but this increase needs to be considered in the context of the overall effects upon openness.

By virtue of the reduced physical effects of built development, the visual perception of openness from within the site, which is largely determined by the amount and spread of development, will also be significantly increased. From outside the site, the visual perception of openness will be little changed because topography and the extent of vegetation enclosing the site means that buildings within the site are barely visible from the surrounding area.

In our view, these reductions are not just material in a planning sense, they are substantial. It is therefore apparent from this exercise that the physical and visual effects of built development on the openness of the site and the area as a whole will be significantly reduced as a result of redevelopment resulting in a significant increase in openness.

### b) Green Belt Objectives

A further role of Green Belt policy is to secure a range of land use objectives, all of which contribute towards sustainable development. There are 6 objectives in total, of which 5 will be secured by the proposed redevelopment. These are:

- **Opportunities for access to the open countryside.** This will be achieved by providing public access into and through the site for the first time and by improving and creating new links to the adjoining countryside.

- **Opportunities for sport and recreation.** This will be achieved by creating new links to Shackleford Heath, providing informal recreational space within the development, and by securing improvements to, and the long term future of, the Cricket Ground.
• Retain attractive landscapes. The Surrey Hills AONB is a landscape of national importance. The proposals not only retain the landscape but significantly enhance it by re-modelling the site, extending the adjoining landscape into the site and providing landscape continuity.

• Improve damaged and derelict land. The existing lawful use of the site and associated buildings, structures, hardstandings and ground modelling has severely damaged the site in physical and visual terms. The proposed development will secure the beneficial use of the site, restore many of its original characteristics and remove all of the causes of damage. If the site continues in its current disused state, it will suffer progressive deterioration and eventual dereliction.

• Secure nature conservation interest. The site is currently of little or no ecological value. The development proposals will significantly improve its nature conservation value by introducing new habitats and enhancing the site’s contribution towards bio-diversity.

Compared with the contribution which the proposed development will make towards 5 of the 6 Green Belt land use objectives, the Realistic Fallback Position will achieve none. This is because if the site remains unused, which is the most likely outcome, it will not even contribute towards the remaining objective of retaining land in agricultural use.

It is therefore clear that the proposed development will significantly enhance the sites contribution to the achievement of Green Belt land use objectives.

c) Visual Amenity

The site currently has the appearance of a densely developed and low quality industrial estate, which is highly damaging to the visual qualities and appearance of the Green Belt. The application proposals will remove all visually inappropriate and unsightly features on the site, and will replace these with substantial areas of open space and a variety of attractively designed dwellings, which are wholly in keeping with the pattern of development and the residential scale and appearance of buildings in the area.

7.11 It is therefore absolutely clear that the proposed development will result in significant benefits to the Green Belt in terms of its purpose, (as measured by openness), land use objectives and visual amenities. The fact remains that notwithstanding its agricultural classification, the existing lawful use of the site causes significant and demonstrable harm to the green belt in actual terms and it fulfils none of the purposes or land use objectives of the Green Belt, and significantly detracts from its visual amenities.

7.12 Furthermore, the correct comparison to make in Green Belt terms is between the proposed development and the realistic fallback position of a redundant site. With no realistic prospect of the existing law use resuming, it is apparent that deterioration and further harm will occur over time if the realistic Fallback Position is allowed to continue.

7.13 In this context, the total harm caused to the Green Belt (actual and in principle) is clearly outweighed by the substantial and permanent benefits of the proposed development. These factors must be afforded substantial weight, and are considered to be sufficient on their own to represent very special circumstances. It is therefore clear that whilst in principle the existing lawful use of the site constitutes appropriate development, in practice, it causes demonstrable harm to the Green Belt in a number of different ways. Conversely, whilst the proposed development represents inappropriate development, it has significant advantages over the Fallback Provision arising out of the substantial and permanent benefits to the Green Belt. In our view, these clearly outweigh any harm caused by the proposed development.

7.14 This matter is considered further in Section 9.
Surrey Hills AONB / AGLV

7.15 Green Belt designation is not a landscape designation, i.e. its purpose is not to protect, maintain or enhance landscape character and appearance. Therefore the impact of the proposed development upon the landscape is an entirely separate consideration and if the proposed development secures an enhancement of the AONB landscape, this is an additional planning benefit of the proposal.

7.16 The site is situated within an Area of Outstanding Natural Beauty, an area of national importance. PPS7 and the relevant policies of the Development Plan all indicate that the conservation and enhancement of the natural beauty of the landscape should be given great weight in development control decisions affecting the AONB.

7.17 As a result, Local Plan policies confirm that the conservation and enhancement of the natural beauty of the landscape is the primary aim of AONB policy. In this regard, there can be no doubt that the proposed development represents a significant enhancement of the AONB landscape and that this is a significant benefit of the proposals. Enhancement will be achieved by:

- Beneficial reuse of the site in keeping with the character of the area, replacing the prospect of disuse and disrepair.
- The removal of inappropriate and unsightly structures.
- A significant reduction in the amount and extent of built development on the site, which combined with the introduction of extensive areas of landscaped open space, generous plot sizes, and landscape improvements secures an appropriate balance between openness and built development and allows the landscape to dominate over built form.
- Ground re-modelling to reflect the original topography of the site.
- Integrating the site into the surrounding rural landscape by extending existing local landscape features into the site, thereby securing continuity in the landscape.
- Reinforcement of the separate identity and setting of Shackleford village, (which is itself a significant feature of the AONB landscape and a conservation area), by introducing a clear physical and open break into the site, providing additional screening of development, and creating a low density and loose knit form of development which is in keeping with development in the surrounding countryside and is clearly distinguishable from the linear form and closely knit character and appearance of the village.
- The removal of a group of leylandii to the rear of Glebe Farm house and the line of leylandii running between the site and Shackleford Cricket Ground, both of which are highly conspicuous in the local landscape and detract from the setting of Shackleford Village and the cricket ground, and their replacement with native tree species.
- Design of buildings which are in keeping with the character of the area in terms of, size, height, massing, proportion, architectural style, elevational details, and use of materials.
- Use of traditional and varied boundary treatments, including walls, hedging, grass verges and fencing.
- Use of incidental open spaces (verges and swales), hedgerows and tree planting along the roadside to reflect the character and appearance of local country lanes.
- Minimising the impact of vehicular accesses, hard surfaces and kerbing, and avoiding a geometric road layout. There is no requirement for street lighting which will avoid the possibility of light pollution.
**Housing**

**General**

7.18 The proposed housing will increase the overall stock of housing in the area, thus contributing to the overall housing requirements of the two Boroughs as set out in policy H1 of the South East Plan 2009 which requires housing in Guildford Borough to be delivered at a rate of 422 dwellings / annum and in Waverley Borough at a rate of 250 dwellings / annum.

7.19 Government policy as set out in PPS3 requires a steady supply of high quality, well designed housing, including private market and affordable housing, which contributes towards the creation of sustainable mixed communities by providing a mix of housing in terms of tenure, price and size to cater for different household needs.

7.20 The proposed development will deliver 18 dwellings, comprising a range of 2, 3, 4 and 5 bedroom houses with tenures split between private ownership, social rent and intermediate rent. Therefore, the proposed development will contribute towards meeting the housing requirements of the two Boroughs in a balanced and sustainable manner.

7.21 The overall standard and quality of the housing will be very high in terms of both accommodation and amenity. This will be achieved in the following ways:

- All dwellings are individually designed.
- The affordable housing meets the Homes and Communities Agency's Quality Standards and Indicators.
- All dwellings meet the Lifetime Homes Standards of the Rowntree Trust and are durable and adaptable.
- All dwellings have their own private amenity space, in all cases in excess of normal minimum and HCA standards, and with its own external storage.
- All dwellings are provided with a workspace (study) or facilities to promote home working.
- Provision has been made throughout the development for people with disabilities.
- Access arrangements give priority for pedestrians.
- The central amenity space and LAP exceed policy requirements for informal recreation and play space and are easily accessible.
- Good natural surveillance.
- The design adopts Secure By Design principles.
- The development achieves a code for Sustainable Home Pre-Assessment rating of Code Level 4 (see Paragraph 7.81 below.)

7.22 Further details of the design and construction of the proposed development are set out in the Design and Access Statement (incorporating Sustainability Assessment). In relation to sustainability, it should be noted that due to the points system adopted by the Code for Stainable Homes, Code Level 4 is the highest level achievable for the site without unacceptably increasing the density and height of development.
Density and Size of Dwellings

7.23 It is an important objective of national and local planning policy to secure the most effective and efficient use of land by reusing land that has been previously development for housing. Targets have been set nationally, regionally and locally to ensure that this objective will be met.

7.24 The redevelopment of the Shackleford Mushroom Farm site for housing will contribute toward this objective and to meeting the brownfield land targets for Waverley and Guildford Boroughs.

7.25 To ensure that the most efficient use of land is made (both brownfield and greenfield), PPS3 also provides for LPA’s to set density standards for new development, and indicates that residential densities should normally be in the range of 30 - 50 dwellings per hectare (net). This advice is reflected in Policy H4 of the Waverley Borough Local Plan which states that the Council will resist development at densities below 30 dwellings per hectare (net) and will encourage development at densities between 30-50 dwellings per hectare (net).

7.26 In addition, Policy H4 of the Waverley Borough Local Plan requires that new housing schemes deliver a mix of house types, comprising at least 50% of dwellings with 2 bedrooms or less, and at least 80% of dwellings with 3 bedrooms or less.

7.27 Set against this policy background, the proposed development will be at a net density of 7.6 dwellings per hectare net, and will comprise 17% of dwellings with 2 bedrooms or less, and 61% of dwellings with 3 bedrooms or less.

7.28 We consider that the proposed net residential density of 7.6 dwellings per hectare is entirely justified in the particular circumstances of the proposed development for the following reasons:

i) The density standard set out in Policy H4 reflects the underlying strategy of the Local Plan to focus new housing development on existing towns and villages, and so does not anticipate or reflect the particular circumstances of this case.

ii) It is clearly intended by PPS3 that housing densities should have regard to a number of factors, including the capacity of local services and facilities, accessibility levels, especially by public transport and the characteristics of the area. This is also expressly acknowledged in former Policy H10 of the Guildford Borough Local Plan which states that lower densities may be acceptable where higher densities would have an unacceptably detrimental impact on the existing character of the area.

iii) The guidance set out in Waverley’s Density and Size of Dwellings: Policy H4 of the Waverley Borough Local Plan 2002 and Guildford Residential Design Guide, also clearly accepts that development should be “design led to make optimum use of the site” with regard to a wide range of factors, including local character and associated constraints, such as access, Green Belt, AONB and Conservation Area designations, accessibility to public transport and facilities, traffic impact, and policies for affordable housing.

iv) In determining an appropriate net residential density, the site’s Green Belt status is an overriding consideration. At a net residential density of 7.6 dwellings per hectare, the proposed development will deliver significant benefits to the Green Belt which would outweigh any harm caused by inappropriateness and would be sufficient for an exception to Green Belt policy to be made. Residential development at higher densities would have a greater impact upon the Green Belt and in such circumstances, the normal Green Belt policy presumption against inappropriate development would prevail.

v) Whilst comparable figures are not available for Waverley Borough, Guildford Borough Councils Annual Monitoring Report 2006/2007 confirms that the average net density of housing development in the Green Belt outside settlement boundaries granted planning permission in 2005/06 and 2006/07 was 9.0 dwellings per hectare. Therefore, the density of the proposed
development at 7.6 dwellings/hectare net is not only consistent with, but is lower than the density of residential developments allowed for by recent permissions.

vi) The site lies within the Surrey Hills AONB, where priority will be given to conserving and enhancing the natural beauty of the landscape and development is required to respect or enhance landscape character. At the local level, the site is situated outside Shackleton Village, which has medium density development at its centre and low density development at its edges and lies adjacent to an area of low density development spreading south to Norney. Therefore, in the local AONB context, the low density of development proposed is consistent with densities in the surrounding area. A higher net residential density would be inappropriate outside of settlements and would result in a form and character of development which could undermine the separate identity and setting of Shackleton Village.

7.29 All of these factors have been taken fully into account in arriving at a proposed mix of house types which is an appropriate and balanced response to the particular circumstances of the site. We therefore consider that an exception to the Policy H4 provision in respect of dwelling types is fully justified in this case.

7.30 We consider that the mix of house types proposed is entirely justified in the particular circumstances of the proposed development for the following reasons:

i) In the local context, residential development in the vicinity of the application site is predominantly low density and is characterised by large detached dwellings in large plots. Whilst individual smaller dwellings and small groups of terraced houses are to be found outside of the settlements, these are the exception and most smaller dwellings are situated within local villages, such as Shackleton, Hurtmore, Puttenham and Peper Harow. As a result, these small dwellings are a distinctive feature of local settlements and make an important contribution to their intimate and close knit character. Against this background, compliance with the requirements of Policy H4 in respect of house types would require a proliferation of smaller house types within the development, with correspondingly smaller curtilages. This would significantly alter the character and appearance of the proposed development which would have a detrimental effect upon the character and appearance of the AONB landscape outside of settlements and would serve to undermine the distinctive identity and setting of Shackleton Village.

ii) The mix of house types required by Policy H4 is based upon the 1997 and 2001 Housing Needs Survey and reflects the need for smaller sized dwellings across the Borough as a whole. It is therefore based on out of date information and takes no account of the particular needs of rural communities, including Shackleton and Peper Harow.

iii) In contrast to the out of date and highly generalised nature of Policy H4 requirements in respect of house types, PPS7 confirms the need to make appropriate provision to meet the identified housing needs of rural communities, where this is demonstrated by up to date and robust information, including evidence of need in terms of house types and tenures. Waverley’s Living and Working Topic Paper, prepared as part of its Core Strategy Issues and Options consultation, acknowledges that current Local Plan housing policies have failed to meet rural housing needs.

iv) Against this background, the applicant has commissioned an independent survey of housing need in Shackleton and Peper Harow wards and has undertaken extensive engagement with the local community in order to establish an accurate and up to date profile of local housing needs as a robust basis for determining the appropriate number and mix of smaller dwellings within the scheme (Documents 3 and 8). In total, 12 households responding to the Housing Needs Survey were identified as being in housing need, all of which expressed a need for dwellings of 3 bedrooms or less, but only 5 of these are registered with Waverley and Guildford Borough Councils. On this basis, the provision of 7 two and three bedroom affordable dwellings to meet the higher 35 percent affordable housing requirement of Guildford Borough
Council represents an appropriate response to meeting the identified affordable housing needs of the local community.

v) In addition, 6 of the households responding to the Housing Needs Survey expressed a wish to downsize properties and this response was reiterated throughout the community engagement process and represents an unmet local demand for smaller private market accommodation. As a consequence, the proposed development includes 4 no. 3 bed private market houses.

vi) It is therefore considered that on the basis of up to date and robust evidence, the inclusion within the scheme of 11 no. dwellings of 3 bedrooms or less meets identified local housing needs. Therefore, in terms of local circumstances, there is no justification for increasing the number of dwellings proposed in order to provide a larger number of smaller dwellings within the scheme in order to meet the requirements of Policy H4. Furthermore, to do so would be unacceptable for the reasons set out at point i) above, in addition to the additional traffic and demand for local services that would result and would be unacceptable to the local community.

vii) It could be argued that Policy H4 could be satisfied by delivering the overall number of dwellings proposed (18) and increasing the proportion of smaller dwellings. However, a financial appraisal of the proposed development has been undertaken, using the Home and Community Agency’s Financial Appraisal Tool, and this has been submitted with the planning application (Document 9). This appraisal demonstrates that to achieve sufficient developer subsidy, to deliver the number and quality of affordable houses proposed, a minimum amount of private market housing is required, and this has been an important consideration in determining the number, type and size of private market dwellings proposed. A reduction in the type and/or size of the private market dwellings would reduce the amount of subsidy available, which would necessitate a reduction in the level of affordable housing and/or would make the development unviable.

7.31 For these reasons, it is considered that the mix of dwelling types stipulated in Policy H4 is not appropriate in the particular circumstances of the case and that the proposed mix of dwelling types is justified.

### Affordable Housing

7.32 The identified need for affordable housing in both Boroughs is considerable and is increasing. In particular, it is understood that Waverley BC is one of the worst performing local authorities in England in terms of the delivery of affordable housing. The Waverley Housing Needs Survey 2005 identified that an additional 622 affordable homes are required every year to meet housing need, but Policies H5 and H6 of the Local Plan have only secured the delivery of 470 affordable dwellings in the 7 years between April 2001 and March 2008. This represents an annual shortfall in affordable housing of 555 dwellings. The Waverley LDF Annual Monitoring Report 2006/07 confirms that affordable housing completions since 2001/02 represent an average of 24% of all housing completions, which is 6% below the general level of 30% affordable housing sought by Policy H5 of the Local Plan.

7.33 The Guildford Housing Needs Survey 2005 shows an annual need for affordable housing provision of 804 dwellings per annum, and there is a steady increase in registrations on the Councils Housing Register of persons in housing need. Between April 2000 and March 2006, 657 affordable dwellings were provided as a result of Local Plan Policies H11 and H12, an average of 110 per annum, and a shortfall against annual need of 704 dwellings. Between 2000 and 2006 affordable housing completions represent 33% of all housing completions compared with the general level of 35% affordable housing which is currently being sought through the Guildford Infrastructure SPD.

7.34 Therefore, in the context of the overall housing needs of both Borough Councils, the provision of 39% affordable housing represents a clear benefit of the scheme.

7.35 PPS3 and PPS7 recognise that affordable housing should be provided to meet housing needs in rural areas and in particular Paragraph 8 of PPS7 states that it is:
"essential that local planning authorities plan to meet housing requirements in rural areas, based on an up to date assessment of local need. To promote more sustainable patterns of development and make best use of previously developed land, the focus for most additional housing in rural areas should be on existing towns and identified service centres. But it will also be necessary to provide for some new housing to meet identified local need in other villages."

7.36 PPS7 also makes clear that priority should be given to the re-use of previously developed land in meeting such needs, except where it would be less sustainable than the use of greenfield sites.

7.37 Against this background of the acknowledged importance of meeting rural housing needs, Paragraph 1.23 of Waverley’s Living and Working Topic Paper, prepared as part of its current Core Strategy Issues and Options Consultation, confirms that there are high levels of affordable housing need in rural areas and smaller settlements, and Paragraph 1.25 explains the unacceptable consequences of failing to address such needs. Paragraph 1.25 goes on to acknowledge that the current approach to housing need based upon Policy H6 of the Local Plan relating to rural housing exception sites is a reactive policy and only applies to certain settlements. Paragraph 1.30 acknowledges that this policy does not address the identified housing needs of smaller villages, including Peper Harow/Shackleford. Similarly, Paragraph 5.66 of the Guildford Local Plan and Paragraph 1.19 of the Guildford Infrastructure SPD acknowledge that there is a need for affordable housing in most rural parishes within Guildford Borough.

7.38 In order to obtain information about local housing needs within the parishes of Shackleford and Peper Harow, Wates Developments commissioned Surrey Community Action to undertake an independent survey of local housing need. This was undertaken in Summer 2008. The results of the Local Housing Needs Survey and an analysis of the identified local needs in terms of number of dwellings, size and tenure requirements are contained in the Report on the Housing Needs Study by King Sturge which has been submitted with the application (Document 8).

7.39 The proposals for the provision of affordable housing within the proposed development in terms of number, size, tenure, occupancy criteria, nomination rights, ownership and management are based upon the findings of this up to date survey and assessment of local housing needs, together with extensive discussions with officers of the local Housing Authorities and prospective Affordable Housing Providers. The full details of the affordable housing proposals are set out in the Report on the Provision of Affordable Housing prepared by Jolliffe and Flint and the Draft Section 106 Agreement submitted within the application, (Documents 9 and 29).

7.40 In summary, the applicant proposes to deliver 7 affordable dwellings, at a level of 38% of total dwellings. This level of provision is in excess of the current affordable housing requirements of both Councils and even exceeds the aspirational targets of the Draft South East Plan (35%). The draft Section 106 Agreement provides for Waverley and Guildford Borough Councils to agree nomination rights.

7.41 The size and tenure mix is based upon the findings of the Survey of Local Housing Need and discussions with the Local Housing Authorities. To further ensure that the affordable dwellings meet local needs, preference will be given to households which have an established connection with the local community.

7.42 Therefore, the proposed development offers both Councils the opportunity to meet the identified housing needs of Shackleford and Peper Harow on the only substantial brownfield site available in the area. At the same time, by prioritising existing members of the local community, the affordable housing element of the scheme will serve to restrict the overall number of trips arising out of the development, as well as the net effect of additional trips generated by the development because residents already live and/or work locally.
7.43 The affordable housing element of the proposal is fully integrated into the development, and is not identifiable by location, segregation or design. It is split into two small groups of housing which are separately accessed and are separated by the central open space and by private market housing.

7.44 The provision of a high proportion of affordable housing within the development to meet the housing needs of the local community will therefore achieve a high level of social cohesion and inclusion, help to maintain and strengthen the local community, provide support for existing community facilities and will help to minimise the need for travel.

7.45 For the reasons set out above this element of the proposal represents a significant planning benefit.

Movement

7.46 The general thrust of planning policy is to guide new development towards the most sustainable locations in transport terms, which is why accessibility should be a key consideration in all development decisions and why PPS7 states that most development which is likely to generate large numbers of trips should be located in or next to rural towns and other service centres that are accessible by public transport, walking and cycling.

7.47 However, PPS7 also acknowledges that the needs of all rural communities should be recognised in planning decisions and in particular, that the housing needs of all rural communities should be met. Therefore, PPS7 accepts that it will be necessary to provide for some new housing to meet identified local needs in other villages, even though this may not be the ideal solution from a transport sustainability point of view. PPS7 also acknowledges that priority should be given to the re-use of previously developed sites such as Shackleford Mushroom Farm in meeting such needs, except where preferable brownfield sites are available or the site performs “so poorly in terms of sustainability considerations” that a Greenfield site is preferable.

7.48 Therefore, PPS7 makes it clear that whilst most developments generating large numbers of trips should be directed towards rural towns and larger villages, other types of development may be permitted in less accessible locations. In these circumstances, the effects of development on transport sustainability must first be considered against all other sustainability factors in arriving at a decision. Where possible, the decision should afford people the greatest opportunity to access towns and other service centres by public transport, walking and cycling, where this is consistent with the primary purpose of the development.

7.49 On this basis, the acceptability of the proposed development in transport terms must take into account:

viii) The trip generating characteristics of the proposed development;
ix) Its primary purpose and whether this purpose is achieved in a sustainable way; and
x) The extent to which the development makes the most of opportunities to access jobs, shops, services and facilities by public transport, cycling and walking.

7.50 The trip generation characteristics of the proposed development are described in the Transport Assessment, (Document 4), accompanying the application and have been compared with the characteristics associated with the existing lawful use of the site as well as a "no development" scenario which assumes that the site remains un-used (ie. the realistic Fallback Position).

7.51 The assessment demonstrates that trip generation from the proposed development represents a reduction over the number of trips arising from the existing lawful use and that even when compared with a no development scenario, the amount of traffic generated will be small, both at peak times and throughout the day. As a result, the Transport Assessment concludes “the proposed development generates a small number of trips, which can be readily accommodated within the local highway network and are of a nature consistent with the rural character of the area”. It should also be noted that in considering the previous application for 25 dwellings, which would generate more traffic than the revised proposals, Surrey County Council did not raise an objection on traffic grounds.
7.52 Policy G12 of the Guildford Borough Local Plan requires that development generating significant numbers of trips will only be allowed in locations highly accessible by public transport, cycle and pedestrian routes, but does not define what significant numbers of trips might be. Policy M1 of the Waverley Borough Local Plan also restricts the location of major trip generating developments to accessible locations within the Borough’s main towns. Appendix 5 of the Local Plan defines major trip generating developments as housing schemes in excess of 200 units and/or which generate over 100 combined trips in the peak hour. Compared to these definitions of major trip generating developments, it is clear that the proposed development (18 dwellings / 18 combined trips in the pm peak) generates a small number of trips and cannot be considered a major trip generating development.

7.53 Furthermore, the calculation of trip generation undertaken for the Transport Assessment takes no account of the following factors which are likely to reduce trip generation further:

- The provision of 7 affordable units, with preference for people who already live and/or work in the area, whose travel needs are likely to be less.
- Provision for home working in all 18 units.
- The Transport Assessment notes that there is a high level of home working in the local area.
- The sustainable travel initiatives proposed.

7.54 It is therefore considered that the number of trips which will be generated by the proposed development is small by any measure and that measures incorporated into the proposals are likely to reduce these levels further. On this basis, we consider that the number of trips generated by the proposed development is appropriate for its location.

7.55 With regard to point ii) above, the primary purpose of the proposed development is to meet the housing needs of the local community. However, in achieving its primary purpose, it also performs highly in terms of the following sustainability considerations:

- The re-use of brownfield land
- Secures significant benefits for the Green Belt and AONB/AGLV
- Meets the identified housing needs of the local community at a single opportunity
- Supports and enhances the social and physical infrastructure of the local community
- Sustains local services and facilities

7.56 It is considered that these wide ranging sustainability benefits far outweigh any locational disadvantages which the site may have.

7.57 In relation to point iii) above, whilst acknowledging that Shackleford is a small rural village, it is clear from the analysis set out in the Transport Assessment that the application site cannot be considered remote. This view is supported by the South East Plan 2009, which states at Paragraph 4.23 that the Region’s urban areas are highly accessible to those living and working in rural communities. The Transport Assessment demonstrates that a range of day to day services and facilities, shops and employment opportunities lie within 5km of the application site and are accessible by public transport, walking and cycling. Furthermore, it is acknowledged by PPG13: Transport in the South East Plan 2009 (Para. 4.23) that the car continues to have an important role to play in rural areas. All of these facilities are easily accessible by car.

7.58 In particular, there is a range of facilities in Elstead and Milford, which Waverley Borough Council classify as local service centres. These centres are located only 4.8km and 4.3km from the application site and can be reached by bus, cycle and car. Godalming town centre is situated 4.8km away and is also accessible by bus, cycle and car.

7.50 A range of local facilities are located within 2km of the application site, accessible on foot. These include the shop/post office, Cyder House public house, Cricket Ground, church, village hall and infant school. The proposed development will help to support these facilities for the benefit of the local
7.60 Also with regard to point iii) above, the proposed development will itself create and improve opportunities for accessing local services and facilities by public transport, walking and cycling in the following ways:

i) Existing and new residents will benefit from the creation for the first time of a route through the site for pedestrians, cyclists and horseriders and improved pedestrian access to informal recreational opportunities within walking distance of the site (Shackleford Heath / Cricket Ground).

ii) Existing and new residents will benefit from the proposed extension of the Waverley Hoppa Community Transport service to serve Shackleford for the first time, thereby improving public transport accessibility and choice for existing and new residents alike.

iii) Provision of a bicycle and cycle storage facilities within each dwelling.

iv) Implementation of a travel plan to provide travel information, monitor and review the performance of travel plan initiatives.

v) Access to home-working facilities in all households.

7.61 It is therefore apparent that the proposed development achieves a range of sustainable development objectives and makes an effective and efficient use of brownfield land to meet housing needs whilst having a limited effect upon transport sustainability. Furthermore, the application site is not so remote in sustainability terms and together with the range of initiatives proposed, the development will make the most of opportunities to access services and facilities by public transport, walking and cycling, thereby complying with the guidance set out in PPS7.

7.62 Details of the proposed access and circulation arrangements to serve the development are set out in the Design and Access Statement and Transport Assessment, (Documents 2 and 4). The proposals are specifically designed to prioritise and promote easy and safe pedestrian and cycle movement within the development and to secure a high degree of permeability and public access into and through the site, by improving links to the surrounding area. These links will benefit existing and new residents alike and will improve access to the centre of the village and the recreational opportunities associated with Shackleford Heath, the Cricket Ground and the proposed central amenity space / LAP. Historically, the use and ownership of the site has precluded public access and has created a barrier to movement. The proposals remove this barrier and actively encourage public access.

7.63 Vehicular access within the site will be restricted and in particular, the proposed layout precludes movement to reinforce safety and amenity. The layout, geometry and detailing of the roads, road edges and corridors have been designed to reflect the character of rural roads.

7.64 Car parking is provided at a standard which is slightly in excess of the standards normally applied by both Borough Councils. Across the development, the standard is 2 spaces per dwelling, (36 spaces in total), compared with the average of 1.5 spaces per dwelling specified in Surrey County Council’s Parking Strategy for Surrey SPG. There are two important reasons which justify this small excess in the level of parking provision:

i) Notwithstanding the availability of local services and facilities, the low density of development and the public transport and travel initiatives proposed, the level of car dependency will remain quite high and should be properly planned for; and

ii) One of the characteristic features of the area is the absence of on street parking. It is important that the development maintains the character of the area by avoiding the visual impact of on street parking.

7.65 For all these reasons, it is considered that the proposed development represents a balanced and appropriate response to transport sustainability.
Community

7.66 The policies of the Waverley and Guildford Borough Local Plans in respect of community facilities are of little relevance to the current application proposals, since they do not address the broader issues of social cohesion and inclusion or the need to sustain communities in rural areas. These are highly relevant material considerations as far as the current application is concerned and should be given due weight. Therefore, it is appropriate to consider the contribution which the proposed development makes to the achievement of these policy aims by reference to national policy guidance set out in PPS1 and PPS7.

7.67 A key policy objective of PPS1 and PPS7 is to promote social inclusion by ensuring that new development recognises the needs of everyone, including the need for homes. This objective is met by the proposed development, which provides a range and mix of housing by size, type and tenure and in particular, is aimed at meeting the identified local need for affordable housing. It nevertheless addresses the needs of all groups in society, including different socio-economic groups and people of all ages, thereby promoting a mixed and thriving rural community.

7.68 The Survey of Housing Needs undertaken by Surrey Community Action confirms that there is a pressing local need for affordable housing in the area. This reflects the general situation which exists in most rural communities and has been acknowledged by both Councils (see Paragraphs 5.51 and 5.56 above). As Paragraph 1.24 of Waverley Borough Council’s Core Strategy Issues and Options Topic Paper: Living and Working states:

"this means that many people who have a connection with the settlement they work in or were brought up in cannot afford to live there. It also means that the mix of people who live in the community can be lost."

7.69 Furthermore, the provision of small scale development to serve the needs of rural communities is provided for by Policy BE5 of the South East Plan 2009, which acknowledges at Paragraph 12.4 that such development can address issues such as stagnation and exclusion resulting from a loss of services or changing community structures.

7.70 In this context, the proposed development will make a significant contribution to the local community.

7.71 The proposed development is well designed, durable and adaptable, features which are important to the quality of life, the health and well-being of individuals. All dwellings achieve the Lifetime Homes standards of the Rowntree Trust and all include provision for homeworking and so are adaptable to changing needs and working patterns. The provision of a large area of open space, the play area and improved pedestrian access to the village and surrounding countryside provides opportunities for leisure and informal recreation that can be shared by the existing community, thereby promoting social interaction and inclusion.

7.72 National planning policies for rural areas also require planning authorities to adopt a positive approach to proposals which improve the viability, accessibility and community value of existing services and facilities, which play an important role in sustaining village communities (Paragraph 7 of PPS7). The policy guidance makes specific mention of village shops and post offices, villages and church halls and rural public houses.

7.73 The proposed development will fulfil this important objective for rural communities both directly and indirectly. In direct terms, the development will:

i) Secure the long-term future of the Cricket Ground, its use by Shackleford Cricket Club and the local community and the refurbishment of the pavilion.

ii) Secure the long-term future of the village playground by transferring ownership to the Parish Council.
iii) Pedestrian and other non vehicular movement through the area, encourage greater use of existing services and informal recreational facilities.

iv) Help to monitor and enhance the role of community facilities which will help to foster social cohesion and inclusion.

v) Improve the range of informal recreational opportunities.

vi) Improve public transport accessibility and choice for the whole community by providing for the extension of the Waverley Hoppa Community Transport service to Shackleford for the first time.

7.74 Indirectly, the increase in population as a result of the proposed development will lead to greater use and the improved economic viability of existing services and facilities such as the village shop / Post Office and public house. From the startpoint of sustainable economic development, the proposals will assist the local economy by generating income, and by encouraging home working.

7.75 Given the value of these community facilities, the proposed development will make an important contribution to maintaining a thriving and sustainable community.

Recreation

7.76 Relative to its modest scale, the proposed development makes substantial provision for recreation, both formal and informal, on site and off.

7.77 Under the policies of the two Local Plans and the provisions of the respective SPDs, the Councils would normally require the development to provide the following:

i) Open space on site at a standard of 2.4-2.8 hectares per 1000 head of population or a financial contribution in lieu;

ii) A children’s play space, where possible; and

iii) A financial contribution towards general leisure and recreational provision within the area.

Set against these normal requirements, the application proposals achieve:

i) The provision of 0.715ha of recreational open space on site, which is nearly seven times greater than the total open space requirement of the two Local Plans;

ii) A local area of play;

iii) The provision of public rights of access across the cricket ground to Shackleford Heath to facilitate informal recreation and improved access to the countryside;

iv) A financial contribution towards the enhancement of the cricket pavilion; and

v) A financial contribution towards general leisure and recreational provision within the area.

7.78 As a result, the contribution made by the proposed development to meeting the recreational needs of existing and new residents will significantly exceed normal policy requirements. Recreational facilities are an important part of the social fabric of the community and the provision made by the proposals to support and extend the existing range of recreational facilities will make a further contribution towards the achievement of a sustainable rural community.

Sustainability

7.79 The wider sustainability benefits of the proposed development are addressed elsewhere in this Statement in relation to specific policy issues such as protection and enhancement of the Green Belt/AONB, meeting the needs of the community for housing, leisure and recreational needs,
sustainable communities, sustainable economic development, sustainable transport initiatives and the recycling of Brownfield land. These benefits are considerable.

7.80 However, it is also relevant to planning to consider the more detailed aspects of sustainable development which relate to the design and construction of development, its use, conservation of natural resources and the management of environmental assets throughout the life of the development.

7.81 Since the Local Plan policy requirements of both Borough Councils are out of date and fairly limited in these regards, Wates Developments has sought to relate the proposals to other established standards and benchmarks with the objective of achieving a level of sustainability in excess of current good practice.

7.82 In order to establish the performance of the development proposals in relation to detailed aspects of sustainability, Wates Developments has appointed Bluesky Unlimited, who are licensed Code for Sustainable Homes and EcoHomes Assessors to undertake a Sustainability Assessment of the proposals. The assessment is included within the Design and Access Statement (Document 2).

7.83 The basis for the assessment undertaken by Bluesky Unlimited is the Code for Sustainable Homes. The Code for Sustainable Homes identifies 6 levels of sustainability, with Code level 3 representing current best practice. Code 4 is defined as “current exemplary performance.”

7.84 Having undertaken a pre-assessment of the proposed development, Bluesky confirm that the development will comfortably achieve a Code level 4 rating. Amongst other things, this equates to an improvement of 44% over the requirements of Part L of the Building Regulations relating to CO\textsubscript{2} emissions.

7.85 Examples of the features of the proposed development which enable it to achieve Code level 4 are as follows:

i) It satisfies Policy SE2 of the Surrey Structure Plan by delivering 10% of its energy requirement from on site renewable sources.

ii) It meets the Homes and Community Agency Design and Quality Standards and Housing Quality Indicators.

iii) It meets the Lifetime Homes Standards of the Rowntree Trust for all 25 dwellings.

iv) Provision is made in each dwelling for home working in the form of a dedicated home office in all private market dwellings and facilities to enable home working in the affordable units.

7.86 It should be noted that one of the main reasons why the proposed development is unable to achieve a higher Code level is the need to restrict the density, height and plot ratio of the dwellings in order to secure other sustainability objectives.

7.87 On this basis therefore, the proposed development achieves the highest level of sustainability that is achievable without compromising other sustainability objectives, but nevertheless Code Level 4 represents current exemplary performance.

7.88 In addition to the exemplary building performance of the scheme, it should be noted that through the substantial reduction in the amount of built development and the introduction of a Sustainable Urban Drainage System, surface water run-off and the likelihood of local flooding will be significantly reduced.

Biodiversity

7.89 An ecological assessment of the application site has been undertaken and the results are set out in Document 11. In summary, due to the extent of built development on the site and the attributes
associated with its use, the site is of negligible ecological value. The ecological assessment also identifies that redevelopment of the site has the potential to put in place a variety of ecological protection and enhancement measures which would contribute towards the objectives of national and local Biodiversity Action Plans.

7.90 A range of ecological protection and enhancement measures are proposed as part of the development and are set out in the Draft Environmental Management Strategy, which would be secured as part of the proposed Section 106 Agreement, (Documents 22 and 25). These include:

- Protection of existing site features to be retained for their ecological value, (mainly trees and hedgerows at the site boundaries);
- Monitoring of the construction process;
- Enhancement through the creation of new habitats such as hedgerows, grassland, landscape planting and wetland features, (swales); and
- A 5 year post construction monitoring programme.

7.91 As part of the Code for Sustainable Homes Pre Assessment undertaken in relation to the proposed development, the value of the proposed measures to improve the biodiversity of the site has been assessed. Of the 4 credits available to be awarded under the Code in relation to ecology, the measures proposed as part of the proposed development would secure all 4. As a result, it is considered that the proposed development will secure the significant ecological enhancement of the site, which will contribute to the overall sustainability of the proposal.

Planning obligations

7.92 A draft of the Section 106 Agreement has been submitted for consideration as part of the application proposals (Document 25). The purpose of the Section 106 Agreement will be to bind Wates Development to planning obligations which will ensure that the full range of planning benefits proposed as part of the development are secured.

7.93 In summary, these planning benefits are:

i) The payment of financial contributions to be used towards the provision and maintenance of physical and community infrastructure in Waverley and Guildford Boroughs. The amount of contribution and the purposes to which it will be put are in accordance with the infrastructure tariff's set out in Waverley Borough Council’s Planning Infrastructure Contributions SPD.

ii) The provision of 7 No. affordable dwellings in accordance with the detailed provisions negotiated between Wates Developments and the housing officers of Waverley and Guildford Borough Councils.

iii) Granting a lease to Shackleford Cricket Club for a period of not less than 10 years based on an annual peppercorn rent and providing for the use of the Cricket Ground and clubhouse by the local community.

iv) A financial contribution towards the improvement for the Shackleford Cricket Clubhouse.

v) Transfer of the village playground to Shackleford Parish Council.

vi) Providing rights of public access to the central open space and signposted rights of public access across the Cricket Ground to Shackleford Heath.

vii) A financial contribution to secure the extension of the Waverley Hoppa Community Transport service to include Shackleford village and the application site.
viii) Establishment of a Site Management Company to be responsible for implementing the Environmental Management Plan and the Green Travel Plan.

ix) Implementation of the Environmental Management Plan prior to occupation of the development and thereafter for as long as the development is occupied.

7.94 In combination, these provisions represent a significant planning benefit.
8.0 Comparison of Revised Proposals and Withdrawn Application WA/2009/0425

8.1 The previous detailed planning application for 25 dwellings was submitted to Waverley and Guildford Borough Councils on 17th March 2009 and was subsequently withdrawn on 10th June. The decision to withdraw the application was based upon adverse comments by the two LPA’s, which led the applicant to conclude that the application was likely to be refused.

8.2 Prior to the application being withdrawn, it was agreed that planning officers from both Councils would provide the applicant with a written summary of the officer’s objections to the scheme for 25 dwellings in the form of the likely recommended reasons for refusal, had the application proceeded to a determination. These indicative reasons for refusal are set out in the note sent to the applicant by e-mail dated 9th July 2009. The note is enclosed at Appendix 11 to this Statement.

8.3 This section of the Planning Statement makes a comparison between the previous scheme for 25 dwellings and the revised scheme for 18 dwellings in order to demonstrate how the indicative reasons for refusal have been overcome.

Reason 1: Green Belt

8.4 Reason 1 indicates that, whilst the very special circumstances put forward in support of redeveloping the site are acknowledged, it is considered by officers that these do not outweigh the harm caused by the proposals, as detailed in Reason 1 and the subsequent reasons for refusal. In particular, Reason 1 cites the opinion of officers that the proposal for 25 dwellings constitutes inappropriate development which adversely affects the openness of the Green Belt.

8.5 In the light of this reason for refusal, the revised proposal for 18 dwellings makes further significant reductions in the amount of development proposed, giving rise to a further significant increase in the openness of the site and Green Belt and making a further material contribution to the very special circumstances which officers have acknowledged already exist, such that the benefits of increased openness, together with the other benefits of the proposal, clearly outweigh the harm caused by virtue of inappropriateness and any other harm.

8.6 The following table summarises the further significant reductions in the amount of development proposed in relation to the existing situation and in relation to the previous scheme for 25 dwellings and the corresponding increase in openness:

<table>
<thead>
<tr>
<th></th>
<th>Existing (m²)</th>
<th>Previous Scheme for 25 dw (m²)</th>
<th>Revised Scheme for 18 dw (m²)</th>
<th>Reduction over existing (%)</th>
<th>Reduction over previous (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Floor Area of buildings (GEA)</td>
<td>11,198</td>
<td>5,645</td>
<td>4,273</td>
<td>-62</td>
<td>-24</td>
</tr>
<tr>
<td>b) Footprint of buildings</td>
<td>11,198</td>
<td>3,188</td>
<td>2,419</td>
<td>-78</td>
<td>-24</td>
</tr>
<tr>
<td>c) Area of hardstandings</td>
<td>11,158</td>
<td>5,401</td>
<td>4,275</td>
<td>-62</td>
<td>-21</td>
</tr>
<tr>
<td>d) Extent of development (B+C)</td>
<td>22,356</td>
<td>8,589</td>
<td>6,694</td>
<td>-70</td>
<td>-22</td>
</tr>
</tbody>
</table>

8.7 In addition, the reduction in the amount of development and the number of dwellings proposed significantly reduces the spread of development and the corresponding extent of domestic curtilages, enabling a significant increase to be made to the amount of recreational and other landscaped open space within the development from 0.736 ha to 1.079 ha. This is an increase of 45% on the previous scheme and results in 35% of the site being in open space use (previously 24%). This represents an increased contribution made by the proposals to the achievement of Green Belt objectives for the use of land (access and recreation) and to the visual amenities of the Green Belt.
8.8 Therefore, in terms of Green Belt aims (openness), objectives and amenities, the benefits of the revised proposals are substantial on any judgement.

Reason 2 and 3: Area of Outstanding Natural Beauty

8.9 Reason 2 states that the scheme for 25 dwellings conflicts with policies in respect of the Surrey Hills AONB because it would be inconsistent with the aim of policy to conserve and enhance the AONB and Reason 3 sets out the detailed basis on which the proposal is considered to be inconsistent with this aim. These factors are considered below.

a) Extent and Number of Dwellings

8.10 That the extent of development (70% reduction over the existing situation and 22% over the previous scheme for 25 dwellings) and the number of dwellings (28% reduction) have been significantly reduced is irrefutable. As a result, buildings would occupy just 7.8% of the total site area at a gross residential density of 5.84 dw/hectare. This represents a low density of development by any measure and is entirely consistent with the low density of development outside of AONB settlements and in the local context set by low density development adjacent to the site such as Glebe Farm, Burwood House, Fiddlers Hall and Shackleford Cottage.

8.11 The extent or spread of the proposed development has been reduced, allowing a significant increase in the amount of open and landscaped open space to be provided from 0.736 ha to 1.079 ha (45%).

b) Layout, Form and Design

8.12 The layout has been changed but continues to be based upon sound design principles. In particular, development is contained within the peripheral areas of the site where it is highly enclosed by existing topography and screening and does not extend into the centre of the site, where it would be more visible. The peripheral location of development within the site ensures that it relates properly to the pattern of development in the surrounding area and, in turn, this enables an enlarged open area at the centre of the site to perform a number of important roles in the local context which contribute towards local distinctiveness:

i) a clear physical and visual break in development across the site, which if not achieved would adversely impact upon views from the centre of Shackelford, and would negatively impact upon the separate setting and identity of the village.

ii) It provides for continuity in the local landscape.

These principles are illustrated in Section 7 of the Design and Access Statement (Document 2).

8.13 There is nothing suburban in character about the proposed layout of the site. Buildings are of different sizes and shapes and are set within plots of different sizes and shapes. These are dispersed across the site in an apparently random and haphazard arrangement within which the buildings are irregularly spaced and orientated in relation to one another, and in relation to the other elements included within the development, such as the access roads and open spaces. This is clearly demonstrated in drawings BM01 to BM05, which further demonstrate that the revised layout is even more haphazard and unplanned than its predecessor. There is nothing uniform, regular or “planned” about the revised layout to suggest that it has a suburban character.

8.14 The form and design of buildings, roads and open spaces are all characteristic of the local area. The dwellings vary considerably in size, plan form, layout, massing, proportion and elevational treatment. The access roads are low key, informal and “under-engineered” to give them the character and appearance of country lanes and their character is reinforced by the informal arrangement of incidental open spaces along the roadside, together with the extensive use of hedgerows and occasional trees as the principal means of enclosure. This creates a public realm which is entirely in keeping with the surrounding area as illustrated by the analysis and photographs included in Sections 2 and 9 of the Design and Access Statement. The detailed landscaping of the central open space reflects the character of the principal landscape elements adjacent to the site.
namely the open pasture of Cyder House Field and the woodland of Shackleford Heath / Norney Grange. This provides continuity in the local landscape.

8.15 It is also relevant to note that the extensive re-modelling of the land form proposed as part of the 25 dwelling scheme has been carried through into the revised proposals in order to reflect the original topography of the site. This will make a further significant contribution towards the natural beauty of the local AONB landscape.

c) **Massing of Buildings**

8.16 The form and massing of the building is consistent with those of the surrounding area. They take the form of detached, semi-detached, link-detached and small terraces, all of which can be seen throughout the AONB area and locally outside of village settlements. In terms of size and massing, the larger 4 and 5 bedroom detached houses are similar to dwellings adjoining the site such as the Old Rectory, Glebe Farm, Burwood House and Fiddlers Hall and to the dwellings which extend south to Norney. These large dwellings are set within large curtilages, which gives rise to a low density and loose knit form of development. This is a distinctive feature of the countryside which lies beyond Shackleford and sets it apart from the village which is characterised by a higher proportion of smaller dwellings, which contribute towards its intimate and close knit form.

8.17 The smaller two and three bedroom dwellings have mainly been grouped into two terraces, which again reflects the form and mass of small dwellings in the AONB, both within and outside of the settlements.

8.18 The reduction in amount of development and the overall number of dwellings proposed has resulted in a significant reduction in the overall mass of buildings on the site. Furthermore, the number of larger 4 and 5 bedroom dwellings has been reduced from 10 to 7.

d) **Domesticity and Orderliness**

8.19 The revised proposals reduce the amount of land within the domestic curtilages from 1.674 ha to 1.435 ha, with a corresponding increase in recreational and informal open space, which is designed to have a natural or semi-natural appearance in keeping with the surrounding area. As a result of the revised proposals, 53 percent of the site will be controlled by an estate management company and maintained in accordance with an Environmental Management Plan which will prevent it from having a domestic or orderly appearance.

**Reason 4: Area of Great Landscape Value**

8.20 This implied reason for refusal is essentially the same as Reasons 2 and 3 which have been considered in detail above.

**Reason 5: Unsuitable Location**

8.21 This reason is put forward by planning officers on the basis that the site is in a relatively unsustainable location, which will result in a high level of dependency on the car. By reducing the number of dwellings from 25 to 18 and the number of bedrooms from 86 to 60, the revised proposals will generate a significantly lower demand for travel in general and a corresponding reduction in the number of car trips.

**Reason 6: Access to Services and Facilities**

8.22 By reducing the number of residents that will occupy the proposed development, there will be a corresponding reduction in the quantitative need for services and facilities and in the need to travel to access these.
Reason 7: Mix of Dwellings

8.23 Whilst the number of dwellings has been reduced, the overall mix of dwellings remains similar:

<table>
<thead>
<tr>
<th></th>
<th>Scheme for 25 dwellings</th>
<th>%</th>
<th>Scheme for 18 dwellings</th>
<th>%</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 bedroom</td>
<td>5</td>
<td>20</td>
<td>3</td>
<td>17</td>
<td>-2</td>
</tr>
<tr>
<td>3 bedroom</td>
<td>10</td>
<td>40</td>
<td>8</td>
<td>44</td>
<td>-2</td>
</tr>
<tr>
<td>4 bedroom</td>
<td>4</td>
<td>16</td>
<td>3</td>
<td>17</td>
<td>-1</td>
</tr>
<tr>
<td>5 bedroom</td>
<td>6</td>
<td>24</td>
<td>4</td>
<td>22</td>
<td>-2</td>
</tr>
</tbody>
</table>

8.24 A detailed justification for the proposed mix of dwellings and why it is appropriate in this case to make an exception to the dwelling mix requirements of Policy H4 of the Waverley Borough Local Plan is set out at Paragraph 7.28 of this Statement.

Reason 8: Integration of Affordable Housing

8.25 The positioning together of 9 affordable and 2 key worker dwellings within the previous scheme for 25 dwellings was considered unacceptable by Guildford Borough planning officers on the basis that it would fail to integrate the affordable housing and its residents into the development.

8.26 The revised scheme overcomes this concern by splitting the reduced number of affordable housing into two terraces of 3 and 4 dwellings and locating them on different parts of the site, adjacent to private market dwellings and separated by private market dwellings and the central open space. This ensures that the affordable housing is properly integrated into the scheme.

Reason 9: Justification for Key Worker Dwellings

8.27 This concern does not apply to the revised scheme for 18 dwellings since the 2 key worker dwellings previously proposed have been omitted.

Reason 10: Flood Risk, Groundwater Protection and Contaminated Land

8.28 The Environment Agency raised objections to the previous scheme for 25 dwellings on the basis that insufficient details had been submitted to demonstrate that the proposals adequately addressed these issues. Following discussions with the Environment Agency, additional information and elaboration on the information previously submitted is provided in Documents 14, 15 and 16 accompanying the revised application which fully addresses these issues and will result in the EA’s objections to the proposals being withdrawn.

Reason 11: Infrastructure Contributions

8.29 As with the previous application for 25 dwellings, the revised application for 18 dwellings will be accompanied by a draft S106 Agreement which includes, in addition to a range of obligations to secure specific planning benefits in respect of local community provision, access, recreation and transport, obligations to secure financial contributions towards infrastructure, calculated in accordance with Waverley Borough Council’s Planning Infrastructure Contributions SPD.

SUMMARY

8.30 The comparison set out above between the revised proposal for 18 dwellings and the withdrawn application proposal for 25 dwellings demonstrates that significant improvements to the scheme have been made, which address all of the reasons for refusal put forward by planning offices in respect of the previous 25 dwelling scheme.
9.0 Very Special Circumstances

9.1 The considerable benefits to be derived from the proposed development are set out in Section 7. However, in terms of Green Belt policy, it is still necessary to establish that very special circumstances exist in relation to the proposed development to allow an exception to the general presumption against inappropriate development to be made.

9.2 The test necessary to establish whether very special circumstances exist is set out in Paragraph 3.2 of PPG2, which states that very special circumstances will exist if, “the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”

9.3 Therefore, the test requires a balancing exercise to be carried out in order to establish whether the total harm to the Green Belt by virtue of the inappropriateness of the proposed development and by other harm it may cause to the Green Belt is clearly outweighed by other material considerations. This balancing exercise involves weighing up the advantages or benefits of the proposed development against the harm, (or otherwise), it would cause to the Green Belt.

9.4 In undertaking this exercise, it is necessary to establish the material considerations that count in favour of the proposed development. In the case of Brentwood BC v Secretary of State and Gray, Christopher Lockhart-Mummery QC, sitting as a deputy judge, expressed the view that any material consideration is capable of amounting to or contributing towards very special circumstances. Such circumstances may include development which would preserve or increase openness or contribute towards Green Belt functions.

9.5 The factors or material considerations which amount to very special circumstances are set out below:

The Existing Lawful Use

9.6 On the basis of the evidence submitted as part of the application, the only reasonable conclusion which can be reached in relation to the existing lawful use is that whilst the use may be considered an appropriate use of the Green Belt in principle, in reality it causes significant and demonstrable harm to the openness, land use objectives and visual amenities of the Green Belt. In these regards, the existing lawful use has all of the harmful physical and visual characteristics of an inappropriate use of the Green Belt, whilst in turn, the only positive contribution which the existing lawful use of the site makes is in relation to the Green Belt land use objective of retaining land in agricultural, forestry or a related use. In our opinion, these factors represent important material considerations, which weigh in favour of the proposed development.

The Realistic Fallback Position

9.7 In normal circumstances, the existing lawful use represents the Fallback Position against which the merits or advantages of a development should be compared. However, in the case of the current application, (based upon the evidence which has been submitted with the application), there is no realistic prospect of the existing lawful use being resumed, whether this is in the form of mushroom production or an alternative agricultural use. In these special circumstances, it is therefore necessary to make a judgement on the merits of the proposed development in comparison with the realistic fallback situation, i.e. in relation to the harm already caused to the Green Belt by the existing lawful use as well as the additional harm that will result from the realistic Fallback Position. As described in Section 7 of this Statement, the additional harm to the Green Belt caused by the realistic Fallback Position will be the further and inevitable harm to the visual amenities of the Green Belt associated with the physical deterioration of the site.

9.8 A further consequence of the site remaining disused is that it will make no contribution whatsoever to Green Belt land use objectives, since the site will no longer be in active agricultural use.
9.9 In summary, therefore, the situation which must be considered when comparing the merits or advantages of the proposed development is one of significant harm caused to the Green Belt by the realistic Fallback Position:

- It causes significant harm to the openness of the Green Belt and serves none of the purposes which the Green Belt is intended to achieve, (Paragraphs 1.4 and 1.5 of PPG2);
- It achieves none of the Green Belt land use objectives, (Paragraph 1.6);
- It has an unacceptably detrimental effect upon the visual amenities of the Green Belt, (Paragraph 3.15).

9.10 These factors make a substantial contribution to the very special circumstances which exist in this case.

Benefits to the Green Belt

9.11 Having established the effects of the realistic Fallback Position upon the Green Belt, it is necessary to consider the advantages or merits of the proposal. This exercise is set out at Paragraphs 7.2 to 7.13 of this Statement, which clearly demonstrate that the proposed development has significant advantages over the realistic Fallback Position, which in summary are as follows:

- A significant reduction in the physical and visual effects of development on the site, resulting in a significant increase in the openness of the Green Belt, thus contributing to its aim and purposes (Paras. 1.4 and 1.5 of PPG2). This will be achieved by the following reductions in the amount of built development:
  - Gross floor area of buildings 62%
  - Footprint of buildings 78%
  - Area of hardstanding 62%
  - Site coverage 70%

  As a result of the revised application proposals, the footprint of buildings will occupy first 7.8% of the total site area compared with 36.4% currently and the developed area of the site (site coverage) in terms of buildings and hardstandings will be reduced from 72.8% to just 21.7%.

- A significant contribution towards 5 of the 6 objectives for the use of land in the Green Belt (Para. 1.6 of PPG2).

- A significant improvement in visual amenity (Para. 3.15 of PPG2).

9.12 In relation to all 3 of these Green Belt interests, it is important to emphasise that the benefit to be derived from the proposed development is not only material, it is significant on any judgement.

Other Planning Benefits

9.13 In undertaking the balancing exercise required by Green Belt policy, it is necessary to take into account any other material considerations which weigh in favour of the proposed development. This includes the possibility of other planning benefits being achieved.

9.14 The issue of whether other planning benefits are to be derived from the proposed development is considered in Section 7 of this Statement. The following benefits have been identified:

i) Enhancement of the natural beauty of the Surrey Hills AONB, firstly through the removal of inappropriate and unsightly development and secondly through the provision of a high quality residential development which, in terms of its layout, scale, form and appearance, is in keeping with the character of the surrounding area and reinforces local distinctiveness. It is important to recognise that landscape enhancement is not an objective of Green Belt policy and therefore,
the enhancement of the AONB is a separate and significant benefit of the proposed development.

ii) The proposal will bring about significant improvements to the setting and separate identity of the Shackleford Village Conservation Area.

iii) The proposed development makes a small but nevertheless valuable contribution to the overall supply of housing in the two Boroughs and which delivers affordable housing at a level in excess of policy requirements. The housing is of a number, size and tenure and will be provided in a location where it is required. Therefore, the proposal meets the identified housing needs of the local community in a balanced and sustainable way. This is a significant benefit.

iv) The proposal delivers a number of individual community benefits which contribute towards the objectives of social cohesion and inclusion and the achievement of a sustainable rural community. These range from the support which the development will provide to the local economy and existing services, to the provision of new or improved recreational facilities, public access to the site and to the wider countryside and improvements to public transport accessibility and choice. In overall terms, these community benefits are considered to be significant.

v) The proposal delivers a number of environmental and sustainability benefits, including decontamination, a significant reduction in surface water run-off and the likelihood of flooding, increased bio-diversity and the provision of sustainable housing which is designed to be adaptable to life changes and to lifestyle changes, including changing working patterns and will achieve substantial energy efficiencies with a reduction in the use of non-renewable energy sources.

vi) Financial contributions towards physical and community infrastructure.

9.15 Therefore, in overall terms, the nature and scale of the benefits that will be achieved are considered to be significant and a further factor in favour of the proposed development.

Public Opinion

9.16 Public opinion is a factor that should be weighed in the overall planning balance. In this instance, there is strong public support for the principle of residential development on the site and this counts in favour of the proposed development.

Harm by Reason of Inappropriateness

9.17 Finally and notwithstanding the significant advantages associated with the proposed development, the balancing exercise required by Green Belt policy requires the proposals to be considered in terms of the total harm to the Green Belt, i.e. the harm caused by inappropriateness as well as the harm caused by impact.

9.18 In relation to the harm caused by impact, it has been clearly demonstrated by reference to the realistic Fallback Position, that rather than causing actual harm to the Green Belt, the net benefits of the proposal to the Green Belt, particularly in terms of openness, are very considerable indeed such as to clearly outweigh any harm which may be caused to the Green Belt by reason of inappropriateness. Therefore, in terms of establishing the total harm to the Green Belt by weighing actual harm against the harm caused by inappropriateness, the balance very clearly comes out in favour of the proposed development. This becomes even more apparent when the actual long term harm arising out of the realistic Fallback Position is taken into account. To this must be added the weight of other planning benefits and public opinion, all of which weigh heavily in favour of the proposed development.

9.19 It is on this basis, i.e. that the harm caused by inappropriateness and other harm is clearly outweighed by other considerations, that very special circumstances exist in this case.
Alternative Uses

9.20 It is the applicant’s view that the considerations set out above clearly amount to very special circumstances. However, during the course of pre application discussions, planning officers raised the possibility that the prospect of an alternative use of the site coming forward which would be more acceptable in principle might be a material consideration.

9.21 The applicant does not accept that this possibility is relevant to the consideration of the application proposals but in order to respond to officers concerns, has nevertheless sought to demonstrate as far as is reasonable and realistic to do so, that there is no realistic prospect of such a situation occurring. As a result, two reports have been commissioned by the applicant and submitted in support of the current application. These demonstrate, on the basis of available evidence and professional opinion, that there is no realistic prospect of a more desirable use of the site coming forward.

9.22 Even if there is a remote possibility that such a use would come forward, it is absolutely clear that it is not possible to undertake an objective comparison between a specific and detailed proposal and a hypothetical situation. Furthermore, it would be unreasonable to undertake such an assessment in these circumstances or for it to form any part of the Council’s consideration of the application proposals.

9.23 Planning officers have also suggested that a marketing exercise might provide sufficient evidence to enable such an assessment to be undertaken. The applicant considers that little or no weight can be given to such evidence and that unless and until a detailed proposal for an alternative use comes forward to enable an objective comparison to be made, it would not be appropriate to take such matters into account in determining the current application. A more detailed explanation of the applicant’s position on this matter is set out in the note at Appendix 12.
**10.0 Conclusion**

10.1 The application proposals represent a balanced and sustainable solution to the future of the Shackleford Mushroom Farm site, which would deliver significant Green Belt and other planning benefits.

10.2 The benefits of the proposed development clearly outweigh the harm to the Green Belt by reason of inappropriateness and any other harm. This amounts to very special circumstances.

10.3 On this basis, it is considered very special circumstances exist which allow an exception to the presumption against inappropriate development to be made.