

DEVELOPMENT CONTROL PANEL

1 December 2021

Item: 2

Application No.:	21/01721/FULL
Location:	Sunningdale Park Larch Avenue Ascot SL5 0QE
Proposal:	The redevelopment of part of the Sunningdale Park estate including the erection of new buildings to provide 96 homes (Class C3), conversion of 3x market dwellings to shared ownership in Mackenzie House alongside associated internal access roads, parking, landscaping, footpaths, drainage, provision of 19 hectares of SANG and other associated works.
Applicant:	Mr Hill
Agent:	Not Applicable
Parish/Ward:	Sunningdale Parish/Sunningdale And Cheapside
If you have a question about this report, please contact: Susan Sharman on 01628 685320 or at susan.sharman@rbwm.gov.uk	

1. SUMMARY

- 1.1 The application relates to part of Sunningdale Park where planning permission to provide a total of 168 dwellings, a care community of 103 units and provision of 16.97 hectares of SANG was granted under application 18/00356/FULL. The permission remains extant, with development having commenced on site, and is material to the consideration of this application.
- 1.2 The proposal involves revising part of the approved scheme to provide 96 dwellings where 74 dwellings have been approved. In addition 3 dwellings approved as market housing will be converted to affordable housing, with a contribution being made for a further 2 affordable units to be provided off-site. An additional 2.03 hectares of SANG is also being provided by the current proposal.
- 1.3 The application site is previously developed land in the Green Belt but it would have a greater impact on openness than existing and would not meet an identified affordable housing need. It is therefore considered that it would be inappropriate development in the Green Belt. Substantial weight should be given to this harm.
- 1.4 The proposal would follow the same approach to the general location of development of the approved scheme, with dwellings sited either side of a central avenue accessed off Larch Avenue. The form and architecture of the proposed dwellings would be notably different from the approved scheme, however no harm would arise in terms of the impact on the setting of the adjoining heritage assets, living conditions of neighbours or in relation to parking and highway safety, environmental and ecological issues and trees.
- 1.5 The character of the area would be largely be unharmed by the proposal, with the exception of part of Larch Avenue where the access point is located. At this point, and particularly when facing south, the scale of the proposed development compared to the opposite side of Larch Avenue would be noticeably out of keeping with the townscape. However, this harm would be limited having regard to the approved scheme, where no objection was raised to the impact on the surrounding townscape, and when considering the character of Larch Avenue as a whole.

- 1.6 Some of the private amenity spaces to the proposed apartments would be below the Council's Design Guide requirements. However, having regard to the extant scheme and the provision of a large area of public open space adjoining the site, only limited harm would result.
- 1.7 In terms of benefits, the proposal would contribute to the supply of housing in the Borough to which significant weight is given. Significant weight is also given to the additional SANG being provided (over and above the approved scheme). It is considered that Very Special Circumstances exist which would outweigh the harms of the scheme and would justify granting planning permission.
- 1.8 Accordingly and on-balance, the adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits when assessed against policies in the National Planning Policy Framework taken as a whole.

It is recommended the Committee DEFER and DELEGATES to the Head of Planning:	
1.	To grant planning permission on the satisfactory completion of an undertaking to secure the affordable housing, SANG and contribution to the Council's Carbon Offset Fund, if necessary, referred to in Section 9 of this report and with the conditions listed in Section 13 of this report.
2.	To refuse planning permission if an undertaking to secure the affordable housing, SANG and contribution to the Council's Carbon Offset Fund, if necessary, as referred to in Section 9 of this report has not been satisfactorily completed for the reason that the proposed development would not be accompanied by the necessary associated affordable housing, SANG, and climate change improvements.

2. REASON FOR PANEL DETERMINATION

- The Council's Constitution does not give the Head of Planning delegated powers to determine the application in the way recommended; such decisions can only be made by the Panel.

3. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

- 3.1 The application site comprises 2.12 hectares located within part of the western edge of Sunningdale Park. The site was previously occupied by buildings associated with its former use as a training facility. Access to the site is via Larch Avenue to the west.
- 3.2 Apartment blocks associated with a new care community development are currently under construction to the north of the site, with Northcote House (Grade II listed) further to the north-east. To the east, at a lower level than the application site is open parkland, which is part of the Grade II Registered Park and Garden. Residential properties lie to the south and west of the site along The Spinney and Larch Avenue respectively. With the exception of the access, the western boundary of the site is heavily vegetated and enclosed by a number of mature trees.

4. KEY CONSTRAINTS

- 4.1 The application site is located in the Green Belt and adjoins a Grade II Registered Park and Garden. An area Tree Preservation Order covers the site.

5. DESCRIPTION OF THE PROPOSAL AND ANY RELEVANT PLANNING HISTORY

- 5.1 Under application 18/00356/FULL, (approved in November 2019), planning permission was granted for the redevelopment of Sunningdale Park including the part demolition,

alteration, restoration, conversion and extension of Northcote House (Grade II Listed), Gloucester Stables and the Walled Garden; the alteration, restoration, conversion and extension of North Lodge, the alteration, restoration and conversion of the Gamekeeper's Lodge and Store, and The Dairy; the part demolition and part alteration, restoration and conversion of South Lodge; refurbishment and extension of Gardeners Cottages and the demolition of other buildings including Park House; and the erection of new buildings to provide 168 dwellings (Use Class C3) (160 net), a Care Community of 103 units of accommodation incorporating communal facilities (Use Class C2), restoration of the Registered Park and Garden, provision of 16.97 Hectares of SANG (within 19 hectares of open space in total), plus associated internal access roads, parking, landscaping, footpaths, drainage and other associated works. This permission remains extant and parts of the approved works have commenced on site.

- 5.2 The application proposal relates to part of the 160 net dwellings approved under application 18/00356. Specifically, the application predominantly covers the part of the site approved to develop 74 new dwellings, (previously referred to as 'Larch View'), which comprises two main parts, Steuart Court (and terraces) and Crossley Court (and terraces) positioned on opposite sides of a new, main avenue accessed from Larch Avenue.
- 5.3 This revised proposal involves redeveloping the site to provide 96 new dwellings, resulting in a net increase of 22 dwellings over the previously approved scheme. As with the extant permission, the new proposal involves two main parts of development either side of a new access avenue. To the south of the avenue would be a building, comprised of four elements, referred to as Crosley Classrooms, Crosley Hall, The Great Hall and The Chapel, which would be arranged around a raised courtyard, with parking beneath. The building would rise to four-storeys above ground level, but present as having three-storeys within the courtyard. Taken together, the buildings would be approximately 72m wide by 68m deep (minus the south-west corner), ranging in height from between approximately 10m to 16m. A total of 65 apartments is proposed within this part of the scheme.
- 5.4 On the north side of the avenue, the proposal comprises a three-storey Gatehouse terrace of three dwellings, positioned close to the site entrance, and a new private driveway, (Scholars Row) in which 4 detached and 4 semi-detached houses would be located. To the east of Scholars Row would be an L-shaped apartment building (Steuart Court) with under-croft parking. This building would be approximately 34m wide by 47m deep and range in height from approximately 10m to 14.5m. 20 apartments are proposed in Steuart Court.
- 5.5 In addition to the 96 new dwellings proposed, the application involves the conversion of three of the approved two-bedroom market dwellings in MacKenzie House to shared ownership. The proposal also includes 19 hectares of Suitable Alternative Natural Greenspace (SANG) in mitigation in respect of the Thames Basin Heaths Special Protection Area, resulting in an increase of 2.03 hectares of SANG over the extant permission.
- 5.6 Development associated with planning permission 18/00356 has commenced and some conditions and amendments relating to that permission, and specific to the application site (which covers Phases B1, B2 and B3 of the original consent) have been discharged. These are summarised in the table below:

Reference	Description	Decision
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20/00315/CONDIT	Details required by part condition 15 (construction environmental management plan)	Approved 02.06.2020.
20/00316/CONDIT	Details required by part condition 24 (nesting season)	Approved 03.04.2020.
20/00328/CONDIT	Details required by part condition 5 (tree protection) 25 (invasive species) 28 (archaeology)	Approved 21.05.2020.
20/00671/NMA	Non-material amendment to 18/00356/FULL to vary the wording of condition 3 (materials); condition 29 (drainage); condition 30 (contaminated land)	Approved 18.05.2020.
20/02345/CONDIT	Details required by part condition 22 (Badgers)	Approved 04.01.2021.
20/03476/CONDIT	Details required by Condition 17 (SANG Management Strategy)	Approved 21.04.2021.

6. DEVELOPMENT PLAN

Adopted Royal Borough Local Plan (2003)

6.1 The main Development Plan policies applying to the site are:

Issue	Adopted Local Plan Policy
Green Belt	GB1, GB2, GB3, GB9
Design guidelines	DG1, H10, H11
Heritage assets	LB2, HG1
Affordable housing	H3
Trees	N6

These policies can be found at <https://www.rbwm.gov.uk/home/planning/planning-policy/adopted-local-plan>

Adopted Ascot Sunninghill and Sunningdale Neighbourhood Plan (2011-2026)

Issue	Neighbourhood Plan Policy
Sunningdale Park Strategic Site	NP/SS8
Housing Policies	NP/H2 (Mix of housing types)
Design Guidelines	NP/DG1 (Townscape), NP/DG2 (Density, footprint, separation, scale & bulk), NP/DG3 (Good quality design), NP/DG4 (Heritage assets, NP/ DG5 (Energy efficiency and sustainability)
Environmental Policies	NP/EN2 (Trees), NP/EN3 (Gardens), NP/EN4 (Biodiversity)

These policies can be found at <https://www.rbwm.gov.uk/home/planning/planning-policy>

Adopted The South East Plan – Regional Spatial Strategy

Issue	Plan Policy
Thames Basin Heaths Special Protection Area	NRM6

7. **MATERIAL PLANNING CONSIDERATIONS**

National Planning Policy Framework Sections (NPPF) (2021)

Section 2 – Achieving sustainable development
 Section 4- Decision-making
 Section 5 – Delivering a sufficient supply of homes
 Section 9- Promoting sustainable transport
 Section 11 – Making effective use of land
 Section 12- Achieving well-designed places
 Section 13- Protecting Green Belt land
 Section 14- Meeting the challenge of climate change, flooding and coastal change
 Section 15 – Conserving and enhancing the natural environment
 Section 16 – Conserving and enhancing the historic environment

Borough Local Plan: Main Modifications Version (July 2021)

Issue	BLP MM Version Policy
Character and Design of New Development	QP3
Development in Rural Areas and the Green Belt	QP5
Housing Mix and Type	HO2
Affordable Housing	HO3
Nature Conservation and Biodiversity	NR2
Trees, Woodland and Hedgerows	NR3
Sunningdale Park Site Allocation	AL35

7.1 Paragraph 48 of the NPPF sets out that decision-makers may give weight to relevant policies in emerging plans according to:

- a) *the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
- b) *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- c) *the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*

7.2 The Borough Local Plan Submission Document was published in June 2017. Public consultation ran from 30 June to 27 September 2017. The plan and its supporting documents, including all representations received, was submitted to the Secretary of State for independent examination in January 2018. In December 2018, the examination process was paused to enable the Council to undertake additional work to address soundness issues raised by the Inspector. Following completion of that work, in October 2019 the Council approved a series of Proposed Changes to the BLPSV. Public consultation ran from 1 November to 15 December 2019. All representations received were reviewed by the Council before the Proposed Changes were submitted to the Inspector. The Examination was resumed in late 2020 and the

Inspector's post hearings advice letter was received in March 2021. The consultation on the Main Modifications has recently closed.

7.3 The BLPSV together with the Proposed Changes are material considerations for decision-making. The weight to be given to each of the emerging policies and allocations will depend on an assessment against the criteria set out in paragraph 48 of the NPPF. This assessment is set out in detail, where relevant, in Section 9 of this report.

7.4 These documents can be found at:

<https://www.rbwm.gov.uk/home/planning/planning-policy/emerging-plans-and-policies>

Supplementary Planning Documents

- RBWM Thames Basin Health's SPA
- RBWM Borough Wide Design Guide

Other Local Strategies or Publications

7.5 Other Strategies or publications material to the proposal are:

- RBWM Townscape Assessment
- RBWM Parking Strategy
- Affordable Housing Planning Guidance
- RBWM Interim Sustainability Position Statement

More information on these documents can be found at:

<https://www.rbwm.gov.uk/home/planning/planning-policy/planning-guidance>

8. CONSULTATIONS CARRIED OUT

Comments from interested parties

166 occupiers were notified directly of the application.

The planning officer posted a notice advertising the application at the site on 14.06.2021 and the application was advertised in the Local Press on 17.06.2021.

50 letters (Including SPAE, excluding duplicates but including additional comments) were received objecting to the application, summarised as:

Comment	Where in the report this is considered
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1.	<p><u>Impact on character of the area:</u></p> <ul style="list-style-type: none"> - The replacement of town houses by a very large block of flats is out of character /out of keeping with properties within Larch Avenue, designated 'Villas in a Woodland Setting; - The large blocks of flats will have a dominating, imposing and overbearing effect on Larch Avenue; - Materially impairs the amenity and character of Larch Avenue and surrounding neighbourhood significantly beyond the approved scheme; - Contrary to policies NP/DG2.1 and H10, H11 and DG1 of the Local Plan as scale and design is out of character as buildings are higher than previous development; - The proposal represents over-development and greater, unwanted urbanisation of Larch Avenue; - This will turn a rural setting into a suburban environment; - Contrary to NP/SS8 which requires any development to respond to key characteristics of townscape; - The proposal will not preserve or contribute to the strong green leafy character of the neighbourhood; - Sunningdale Park and its immediate environment has a relatively low density residential environment, the density proposed would be greater than you would find in many areas of London; - The development is closer / too close to Larch Avenue; - Replacing a 3 storey building with a 4 storey building, which is out of keeping with Larch Avenue and deviates from original application; - Lacks separation with increased sense of scale and bulk ; - Exceeds the original scheme which we judged to be on the limit; - Will turn the village into a suburb in terms of the scale of building proposed; - Introducing the varied styles would not outweigh the urbanising effect that so much surface parking would have. 	9.6 – 9.22
2.	<p><u>Poor design:</u></p> <ul style="list-style-type: none"> - The new building is ugly and will be equivalent to a 19th century army barracks; - The townscape will be blighted by this prison-style design; - Design is incongruous with the pattern of housing and contrasts sharply with low density locality; - The design is hideous and oppressive. A planned row of town houses will be replaced by a monolithic facade of a large block of flats; - The building is an abomination and can in no way be said to fit in with the local environs; - Key reason for rejection should be bulk. New apartment building should only be allowed to be built up to the same height as the previous buildings (3 storeys); - Significantly more surface parking; - Contrary to NP/DG3 and NP/SS8.4. 	9.6 – 9.22

3.	<p><u>Impact on living conditions of neighbours:</u></p> <ul style="list-style-type: none"> - More traffic will lead to more noise disturbance - Will lead to a significant increase in overlooking/loss of privacy, contrary to section 8.3 of the Borough Wide Design Guide; - Loss of privacy from balconies looking directly over properties in Larch Avenue, - Monstrous buildings that will be dominant and overbearing; - Will spoil the peace and enjoyment of local residents' homes; - Will severely impact the amenities of occupiers of existing properties on the opposite side of Larch Avenue; - Will spoil the sanctity of our small community; - Overspill of light pollution from highest windows facing Larch Avenue; - It is pointless for the RB to have grandiose documents about well-being and mental health of residents if the planning authority only pays lip service to them. 12 months of constant noise and vibration has ruined my enjoyment of my garden. Further development will mean that the enjoyment of my garden will have be removed for over 2 years. This is above what any resident should have to endure to their mental health. 	9.23 – 9.25
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4.	<p><u>Highway Safety:</u></p> <ul style="list-style-type: none"> - Will lead to significantly more traffic using the Silwood Road and Larch Avenue junction which is already very dangerous on a corner; - Station Road and Silwood Road are used as a rat-run with a great deal more traffic recently causing vehicles to drive partly on the pavement to get through; - The surrounding roads are under-sized and over used and severely congested most times of the day; - Nearly 600 additional traffic movements per day, yet the developer is not proposing any changes to the current bottleneck at Silwood Road. - If approved, should have a condition that Silwood Road is widened and parking spaces along the road, (particularly outside shops and businesses) are provided; - The number of new housing units will exacerbate an already existing trouble spot for traffic. The developer should pay for widening of Silwood Road so that two lanes of traffic can move freely, while also providing parking for the businesses located there; - Real concerns about the level of traffic and road safety especially with regard to children attending local schools; - The traffic consultants over-estimated the traffic generated by the previous Government Training College; - Given the distance from the train station and village centre, many people will use their cars for most journeys. - There will be an increase of at least 88 traffic movements per day, so the figure provided by the applicant seems totally unrealistic; - The junction at A329 London Road and B383 Buckhurst Road is becoming increasingly dangerous and there should be a roundabout there. - Parking on Larch Avenue is dangerous particularly near junction with Silwood Road. The pavement on the LHS as you turn into Larch Avenue from Silwood Road has been extended, so that if cars are waiting to pull out of Larch Avenue, cars on Silwood Road cannot turn in as the road is too narrow. This causes congestion at this point. 	9.33 – 9.36
5.	<p><u>Parking:</u></p> <ul style="list-style-type: none"> - Insufficient/ total lack of visitor parking spaces; - Likely to have a significant adverse effect on parking on Larch Avenue; - Proposed car parking significantly exceeds those previously provided by the college; - Insufficient parking, contrary to NP/T1.1. 	9.32 – 9.36

6.	<p><u>Lack of infrastructure:</u></p> <ul style="list-style-type: none"> - Insufficient infrastructure to cope with the size of the current development let alone more; - The infrastructure does not exist to support this. Local residents already struggle with school places, access to doctors and NHS dentists; - A real gain of the proposal would be a doctors surgery, rather than the park; - The Council is already unable to keep up with cleaning and maintenance of roads, trees etc in our village – how will it be able to improve after an increase in residents? - Appropriate and necessary infrastructure and community facilities has been completely overlooked. 	Section 10
7.	The developer's justification for the revised scheme does not stack-up.	Noted
8.	The Council should not be taken-in by 'expert' assessments which offend common sense.	Noted
9.	Do not be taken-in by the tree cover which Berkeley Homes feature in their plans. Trees exist but not in the profusion shown and certainly not in the Winter.	Noted
10.	Poor access to shops and jobs due to lack of public transport. People are unlikely to walk or cycle.	Noted
11.	The application is a 'Mastery of Theatre'.	Noted
12.	People of Sunningdale are unitedly appalled and do not agree that the permanently open park is a gain given Windsor Great Park and Virginia Water.	9.56
13.	The very special circumstances to seemingly break all Planning rules makes a mockery of keeping the Borough free from inappropriate development.	9.1-9.5
14.	The proposal is purely about taking and giving.	Noted
15.	This is exactly the type of 'back door' amendments we, as residents, were fearful of at the time of the original proposals. No doubt there will be more to come.	Noted
16.	The proposal is not in keeping with the Borough's Environment and Climate Strategy.	Noted

Consultee responses (summarised)

Consultee	Comment	Where in the report this is considered
Sunningdale Parish Council	<p>Recommends Refusal</p> <p><u>Scale and bulk:</u></p> <p>The proposed scheme has introduced large sections at the corners which are significantly higher than the approved scheme. This increases the overall bulk of the building (Crossley and Steuart).</p> <p>One of the main concerns is the change to Crossley Court and the view of the apartment block from Larch Avenue. A 4 –storey, monolithic structure like this does not sit comfortably opposite the houses in Larch Avenue, where the townscape is described as 'Villas in a Woodland Setting'. The proposal is therefore contrary</p>	9.6 – 9.22

	<p>to policies NP/DG1, NP/DG2 and NP/DG3 of the Neighbourhood Plan.</p> <p>We would argue that this added bulk at the corners adds significantly to the perception of scale, which would be contrary to policy NP/DG2.</p> <p>The applicant accepts that Crossley Court is taller than the approved scheme in places by circa 3m.</p> <p><u>Inappropriate architectural style and layout:</u></p> <p>The application proposes architectural changes to Crossley and Steuart Court which are significantly different to the architectural style of the approved scheme.</p> <p>Examples of the proposed style of architecture are urban examples. These are large, multi-storey urban buildings. Sunningdale is a village, not a town or city centre and the style, scale and bulk of the proposed buildings are not appropriate in this location.</p> <p>In selecting this urban reference point, the proposal is contrary to section 12 of the NPPF.</p> <p>A wide variety of architectural features are now included and the layout and positioning of buildings has also changed. Continuing the urban theme the positioning of the Crossley buildings in a square is more concentrated with less open views than the approved scheme.</p> <p>The southern flank of the Crossley Great hall appears to be dangerously close to a TPO tree.</p> <p>The juxtaposition of architectural styles, together with the size, scale and bulk does not represent 'Good Quality Design' as defined in policy NP/DG3.</p> <p><u>Traffic and access:</u></p> <p>Additional traffic along Larch Avenue and Silwood Road from the development at Sunningdale Park continues to be a major concern to residents.</p> <p>It is hard to comprehend how the introduction of 271 dwellings could result in a 2.2% reduction in traffic.</p> <p>Silwood Road is already a traffic bottleneck and some serious work needs to be done given the increased traffic using this road.</p> <p>We would like to see an updated traffic report and plan of</p> <p>Action from RBWM to address these concerns.</p> <p>A329 London Road/B383 Buckhurst Road/ B383 Silwood Road – The Parish Council is concerned about the build-up of traffic at these junctions. The RBWM Delivery Plan indicates that improvements have been identified here but are a low priority in the emerging Local Plan.</p> <p>The Parish Council considers that the applicant should fund a new roundabout at this junction given the proposed increase in dwellings.</p> <p><u>Green Belt:</u></p> <p>The revised design of the Crossley building, together with the new building style centred around a square, as well as the extension of the Great (Crossley) Hall further into green space and undeveloped area of the site does</p>	<p>9.10 – 9.22</p> <p>9.30 – 9.36</p> <p>9.1 – 9.5</p>
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	<p>affect openness of the Green Belt and is therefore contrary to paragraphs 145 and 146 of the NPPF.</p> <p><u>Local Plan:</u> Sunningdale Park was allocated 230 homes in the Local Plan. Planning permission was approved for 271 dwellings. The proposal will increase the number of dwellings to 293, approximately 30% over the Local Plan allocation.</p> <p><u>Parking:</u> Sunningdale Park is not a sustainable location close to major transport hubs. There are no buses and the station is 1.1 miles away, that takes 24 mins to walk. Most people will drive. It is questionable whether there is adequate parking for the density of development. There is inadequate visitor parking. There is a risk that there will be a reliance on on-street parking and additional pressures placed on the already inadequate parking in Larch Avenue. This is contrary to NP/T1.</p> <p><u>Highways:</u> There has been a recent change of road layout at the junction of Larch Avenue and Silwood Road which is causing problems as a result of the highway being narrowed. RBWM highways need to carry out an urgent site visit.</p> <p><u>Mackenzie House:</u> The proposed re-design does not include Mackenzie House which would be in a prominent position in Larch Avenue. This should be included in the current proposal in order to assess the full impact rather than on a piecemeal basis.</p>	9.20
<p>RBWM Conservation / Design Officer</p>	<p><u>Initial comments:</u> No objection in principle to the architectural design of the revised scheme. The materials and finishes will need to be exceptional as the design relies heavily on good architectural detailing, particularly the Crosley block which has the potential to appear quite monumental. The layout is considered to be an improvement with more clearly defined public and private space. Suggested improvements to ground floor undercroft parking. Services, plant, life overruns, PVs etc at roof level should be shown. Crosley – the roof appears very bulky on the south elevation (the Chapel) McKenzie – the detailed design of this could do with more consideration so that it ties in with the architecture of the rest of this part of the site.</p> <p>Requested further information on: Contextual elevations without the trees, including cross-sections across the roads. Viewpoints from Northcote House and Park Comparison of footprints between proposed and approved</p>	9.6 – 9.22

	<p>Plans to show reduced height of Crosley south elevation to assess height and massing in context of adjacent buildings</p> <p>More details required on soft landscaping/landscape scheme and hard-surfaced areas.</p> <p>More details required on sustainability in particular with reference to the Council's Position Statement on Sustainability.</p> <p><u>Re-consultation response:</u></p> <p>The current revised scheme is an improvement on that previously agreed in terms of its design and layout. It is my view that this scheme will have no greater impact on the setting, and hence the significance, of the adjacent heritage assets than that previously approved. Having considered the revised details together with the letter from Mr Hill of Berkeley Homes dated 24th September, I confirm that I have no further comments to make on this application.</p>	
Highways	No objections subject to conditions relating to parking layout and cycle parking provision.	9.30-9.36
Trees	<p>Initial comments:</p> <p>Requested existing layout plan overlaid with approved layout and proposed, to discern what the changes are and whether this has any implications for trees.</p> <p>Clarification required on some annotations on plans and technical note for SANG management plan.</p>	9.45-9.48
Lead Local Flood Authority	<p>Initial comments:</p> <p>Additional information required.</p> <p>Re-consultation response awaited.</p>	9.41
Environment Agency	No comments.	Noted
Thames Water	No objections.	Noted
Natural England	No objections.	Noted
Housing Enabling Officer	The proposal provides for an additional 5 affordable units, comprising 3 additional flats for shared ownership, plus a financial contribution in-lieu of the on-site provision of 2 affordable flats.	9.51-9.53
Environmental Protection	Recommends conditions in respect of contaminated land and a site specific construction environmental management plan.	9.25

9. EXPLANATION OF RECOMMENDATION

9.1 The key issues for consideration are:

- i Principle of development
- ii Design considerations
- iii Impact on neighbouring amenity
- iv Provision of suitable residential environment

- v Highway considerations and parking provision
- vi Environmental considerations
- vii Ecological issues
- viii Impact on important trees
- ix Impact on heritage assets
- x Affordable housing
- xi Other material considerations

Principle of development

- 9.1 The application site is located within the Green Belt and is identified in the Local Plan as a 'Major Developed Site in the Green Belt' under Policy GB9. However, given the age of the Local Plan, Policy GB9 is now out-of-date. The application site is also identified as Strategic Site NP/SS8 in the Neighbourhood Plan (adopted 2014) and is an allocated housing site (AL35) in Policy HO1 of the emerging Borough Local Plan. The most current policy with regard to assessing applications for new development in the Green Belt is the National Planning Policy Framework (NPPF) 2021.

Whether the development is inappropriate development in the Green Belt

- 9.2 Paragraph 147 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 149 further adds that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt, with the exception of certain types of development. These exceptions include "limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority."
- 9.3 Whilst the proposal would constitute the redevelopment of previously developed land, it would have a greater impact on openness of the Green Belt than the existing. In addition it is not considered that the affordable housing proposed contributes to meeting an identified affordable housing need. As set out further in paragraphs 9.51-9.53, the quantity of affordable housing proposed is considered to meet policy requirements, but the proposed tenure of 100% shared ownership with an additional off-site contribution does not meet the identified need within the Borough. Whilst there are material considerations which make this justifiable in relation to affordable housing policy, it is not considered that it meets the relevant test within NPPF paragraph 149 g.

- 9.4 The application also involves the change of use of 2.03 hectares of previously approved open public space in the Green Belt to Suitable Alternative Natural Greenspace (SANG). As this part of the proposal would remain in a recreational use that would preserve the openness of the Green Belt and not conflict with the purposes of including the land within it, this complies with paragraph 150 e) of the NPPF.
- 9.5 As part of the proposal is considered to be inappropriate development, then the whole application must be assessed as such. The proposal will only therefore be acceptable if Very Special Circumstances exist which outweigh the harm by reason of inappropriateness and any other harm identified in this report. This is fully considered in the Planning Balance.

Impact on Openness and Purposes of the Green Belt

The proposed change of use of open space to SANG and the proposed change of use of units within McKenzie House would have no harmful impact on openness nor the purposes of the Green Belt.

The proposed residential development would have some, albeit limited, harm to the openness of the Green Belt when compared with the former training facility buildings. Furthermore, the extant permission is considered a relevant material consideration when weighting the impact of the current scheme on the openness of the Green Belt. As works have been commenced to implement the extant consent, it is a realistic fallback position that scheme would be implemented in full were permission for the current application not to be forthcoming. As set out in more detail below, there are differences in the height, position and footprint of the two schemes. However, the current proposal is an overall reduction in hardstanding and footprint compared to the extant which would reduce its spatial impact on the openness of the Green Belt. The modest increase in height at certain points of the proposed development and the repositioning of elements of the scheme would have only a very limited impact on the openness of the Green Belt. Given the previous use of the site and the extant consent, it is not considered that the proposal would conflict with any of the purposes of including land in the Green Belt.

Conclusion on Green Belt Assessment

Accordingly, the proposal is inappropriate development in the Green Belt and the case for Very Special Circumstances is considered further below.

Design considerations

- 9.6 Policies H10 and H11 of the Local Plan require new housing proposals to display high standards of design and landscaping, and the scale and density of new development should be compatible with the character and amenity of the area. Policies NP/DG1, NP/DG2 and NP/DG3 of the Neighbourhood Plan state new development should respond positively to local townscape and that new development should be similar in density, footprint, separation, scale and bulk of buildings in the surrounding area. Emerging policy QP3 of the BLP expects all new development to contribute to achieving sustainable high quality design in the Borough by following a number of design principles, including respecting and enhancing the local character of the environment.

Housing density, type and mix

- 9.7 The density of the proposed development is 45 dwellings per hectare. Although this is an increase over the approved scheme, which has a density of 34 dwellings per

hectare, both densities are within the medium range of residential densities and indicate a more efficient use of the land.

- 9.8 The proposed development would provide a wider range of homes than the approved scheme, as outlined below:

	Proposed	Approved
1 bedroom apartments	10	0
2 bedroom apartments	49	40
3 bedroom apartments	15	17
4 bedroom apartments	10	0
3 bedroom houses	2	0
4 bedroom houses	10	17
Total	96	74

- 9.9 The proposal would also provide for an additional 5 affordable homes for shared ownership in the Borough.

Design, scale and layout

- 9.10 The design and layout of the proposed scheme has been informed by the existing landscape and heritage assets within Sunningdale Park with, as advised by the Council's Conservation Officer, "a design nod to the previous academic use of the site and to the architecture of the secondary red brick Victorian buildings of the Northcote House estate."
- 9.11 As with the approved scheme, the proposal would be centred around a new, tree-lined avenue, referred to as Park Avenue, which would extend from the Larch Avenue entrance to the parkland beyond. To the south of the avenue would be an apartment building that would provide 65 flats within four distinctive elements referred to as The Great Hall, Crosley Hall, Crosley Classrooms and The Chapel. As with the approved scheme, some parking would be provided beneath a central podium with a landscaped area above.
- 9.12 Taken together, the elements of the 'Crosley' building would be approximately 72m wide by 68m deep (minus the south-west corner), compared to the approved scheme on this part of the site which would be approximately 68m wide by 64m deep. In terms of heights, the proposal ranges from 9.7m to 15.9m, with the predominant height around 13.3m. The approved scheme heights range from 10.9m to 13.9m, with the predominant height around 12.9m. A gap of approximately 20m between the west elevation of the building and the back of the footpath along Larch Avenue would be retained, which is comparable to this part of the approved scheme. The proposed 'Crosley' building would be closer to the parkland to the east of the site by approximately 5m, but the position of the building in relation to MacKenzie House to the south would be similar to the approved scheme.
- 9.13 On the northern side of Park Avenue, the development would comprise a terrace of three houses (referred to as The Gatehouse), an apartment block of 20 units (with two distinctive elements referred to as Steuart Dorms and The Library), and a row of 4 detached and 4 semi-detached houses, referred to as Scholars Row. The Gatehouse would be approximately 15m back from the site entrance and face Park Avenue, with Scholars Row positioned between this and the apartment building. The L-shaped apartment building would be approximately 7m back from the parkland edge at its closest point.

- 9.14 The Gatehouse would have three-storeys and be approximately 11m high by 20m wide and 10m deep. A row of 4 detached houses within Scholars Row would run perpendicular to The Gatehouse at approximately 13m away. Plots 1 to 3 of the detached houses would have three-storeys and be approximately 11m high and include single integral garages. Plot 4, positioned towards the north-west corner of the site, would also be a three-storey detached house, but with a slightly lower ridge line at approximately 10m and wider frontage; This property would also include a double integral garage. The two-pairs of semi-detached houses at the end of Scholars Row backing onto to the north boundary of the site would also have three-storeys at approximately 11m high and each includes a single integral garage. For comparison, the approved terraced dwellings, located in a similar position to the houses in Scholars Row, would have 4 storeys and a ridge height of approximately 13.5m
- 9.15 The apartment building, comprising Steuart Dorms and The Library, would be approximately 34m wide by 47m deep and vary in height from 10m to 14.4m, with the predominant height at approximately 12.5m. By comparison, the approved Steuart Court apartment building is approximately 46m wide by 51m deep with a predominant height of 12.9m.
- 9.16 Architecturally, the proposal is notably different from the approved scheme which has a contemporary appearance and is more repetitive and symmetrical across the site. By comparison, the current proposal has a more varied layout and is of a more traditional design, which includes a variety of heights, openings, architectural features and detailing. The majority of the new build will be in traditional red brick.

Impact on character of the area

- 9.17 On the southern side of Park Avenue, the proposed scheme would involve a higher density and bulkier form of development compared to the approved scheme. The Parish Council and a number of residents in Larch Avenue and the surrounding area have raised objections to this part of the scheme in particular on the grounds that the scale, bulk and design of the development would be out of character with the 'Villas in a Woodland Setting' character area of Larch Avenue, as identified in the RBWM Townscape Assessment. In addition, a number of objections have raised concerns about the dominant and overbearing and urbanising impact the development would have on the area.
- 9.18 It is material to the consideration of this application that the approved scheme was not considered to have an adverse impact on the character of Larch Avenue and surrounding environment within the 'Villas in a Woodland Setting'. In addition, the proposed development south of Park Avenue would be no closer to Larch Avenue than the approved scheme and the existing mature tree belt along the western boundary is to be retained. In terms of height, the proposed elevation facing towards Larch Avenue would not be materially higher overall than the comparable approved elevation.
- 9.19 The main impact of the proposal development in the context of the character of Larch Avenue would be apparent from the access point where there is a gap in the tree belt, particularly when viewed from the north side of the access. At this point, the scale and density of the proposed development on the south side of Park Avenue compared to development on the west side of Larch Avenue would be apparent. However, when considering the approved development, the impact on Larch Avenue would not be significant. Having regard to the proposed development to the north of Park Avenue, which would have a more open and better relationship to Larch Avenue, and the impact

to the overall townscape area, there would only be limited harm to the character of Larch Avenue.

- 9.20 With regard to the impact of the proposal on the character of the development to the north of the application site, the scheme would effectively open-up the gap between the community care apartments and the proposed houses, thus improving the relationship between the two schemes compared to that previously approved. The design and setting of MacKenzie House to the south of the site would be largely unchanged to the approved scheme. Although this would have a more contemporary appearance to the proposed scheme, the differences would not be materially harmful to the character of the area. Notwithstanding this, the applicant has submitted a non-material amendment application, (which is currently under consideration), in respect of some minor architectural changes to MacKenzie House to make it more architecturally comparable with the proposed development.
- 9.21 The removal of the access road adjacent to the Registered Park and Garden to the east of the site, approved under the original application 18/00356, is a significant improvement of the current proposal. The proposed semi-detached houses located towards Northcote House are also an improvement on the approved scheme. Subject to conditions in respect of materials and hard and soft landscaping, the proposal would not harm the character of the parkland to the east.
- 9.22 Overall it is considered that while there would be harm to the character of Larch Avenue when viewed from the access point and facing south, this harm would be limited and overall the proposal would not be harmful to the character and appearance of the wider area. Further consideration of the potential harm given in the Planning Balance is set out below in section 11 of this report.

Impact on neighbouring amenity

- 9.23 Emerging policy QP3 of the BLP requires that new development does not have an unacceptable effect on the amenities enjoyed by the occupants of adjoining properties in terms of privacy, light, disturbance, vibration, pollution, dust, smell and access to sunlight and daylight. Paragraph 130 of the NPPF also requires new development to provide a high standard of amenity for existing and future users.
- 9.24 The closest residential property to the proposed development would be at least 40m away on the opposite side of Larch Avenue, behind a mature tree belt and heavily vegetated boundary. Given this separation distance and screening, the proposal would not harm the living conditions of neighbours living to the west of the site in terms of loss of privacy, loss of sunlight or daylight, or from the development appearing dominant and overbearing. No harm to neighbours amenities would arise from the development as a result of light pollution, as external lighting is to be controlled by way of a planning condition, (as with the approved scheme and to reduce any impact on protected wildlife), and any internal lighting in the evening and/or at night would be when curtains or blinds would be closed.
- 9.25 Issues in relation to disturbance, vibration, pollution, dust and smells, which may arise in particular during the construction phase, would be managed by the approved Construction Management Environmental Plan that exists for the redevelopment of Sunningdale Park, including the application site. Any activities arising from the construction or occupation of the site that are a public nuisance could be dealt with under Environmental Protection legislation if necessary.

Provision of suitable residential environment

- 9.26 With regard to the apartment building located to the south of Park Avenue, all apartments would meet the minimum Nationally Described Space Standards (March 2015). In addition, all main living rooms would be outward facing, overlooking communal greenspace, with no neighbouring buildings appearing overbearing, (including MacKenzie House to the south which would be approximately 20m away from the closest living room of the proposed development). None of the apartments would be directly overlooked to such a degree as to cause loss of privacy.
- 9.27 All apartments proposed within the building to the south of Park Avenue would be served by private amenity space in the form of either direct access to open space, (as in the case of some ground floor apartments), or by private balconies. However, the majority of this private amenity space would not comply with the RBWM Borough Wide Design Guide and, although the living rooms are outward facing, the majority of apartments would not have dual aspect as recommended by the Design Guide.
- 9.28 The proposed dwellings in Scholars Row located on the north side of Park Avenue comply with the Nationally Described Space Standards and meet the residential amenity guidelines set out in the Borough's Design Guide. The majority of the apartments proposed in the Steuart Dorms and Steuart Library building would have dual aspect and be provided with sufficient private amenity space. No apartment would be adversely affected by loss of privacy, nor suffer from any neighbouring development being overbearing.
- 9.29 As with the impact on the character of the area, the aspect and private amenity space provided by the approved scheme is material to the consideration of this proposal. In particular, some of the apartments approved would have had private amenity space below the current Design Guide requirements. In addition, regard should be given to the large amount of open space provided by the adjoining parkland, which will provide ample space for residents to exercise. Having regard to these matters, any harm caused would be limited.

Highway considerations and parking provision

- 9.30 Policy T5 of the Local Plan states that all new development proposals would need to comply with the Council's adopted highway design standards, and Policy P4 states planning permission will only be granted where the proposal demonstrates that the proposed parking provision meets the Borough's standards, to prevent any unacceptable impact on the local highway network. Policy NP/T1 of the Neighbourhood Plan also requires developments make adequate provision for parking and access, and that on-street parking must not be relied on.
- 9.31 Access to the application site would be provided by a new access point off Larch Avenue and as approved under application 18/00356/FULL. No alterations to this access point are proposed under the current application.
- 9.32 The proposal would provide for 204 parking spaces, comprising 93 surface spaces and 111 undercroft spaces, including 9 unallocated spaces for visitor car parking. The proposed parking provision represents an increase of 32 car parking spaces over the extant permission. The Highway Authority has advised that the proposed parking complies with the maximum standards adopted in the Borough's Parking Strategy.
- 9.33 A number of objections received express concerns that the development could lead to a dangerous increase in parking along Larch Avenue, however it is material to the consideration of the application that national planning policy encourages lower parking

standards to encourage sustainable modes of transport and reduce car-borne trips. In this case, as the proposal complies with the Borough's maximum standards, it should not result in any overspill of parking on to Larch Avenue.

- 9.34 The submitted Transport Statement advises that without the parkland parking, (that is the separate car parking accessed via Silwood Road provided for members of the public to access the SANG), the proposal would lead to an increase in 10 two-way trips during both the am and pm peak hours. Without the parkland parking, the proposal would lead to an increase of 11 two-way trips in the am hours and 12 two-way trips in the pm hours. The predicted additional traffic resulting from the proposal is based on traffic flows estimated in relation to the traffic flows that would have been associated with the former hotel, training, conference and B1 offices uses of the site at full occupancy.
- 9.35 It is important to note that the predicted traffic flows are correctly based on the former uses of the site at their maximum capacity/occupancy. A number of objections received question whether the proposal would have a minimal impact on surrounding roads, and indeed raise concerns that the additional traffic would have a significant impact. However, in the years leading up to Sunningdale Park being vacated, the facilities were being wound-down and thus the associated traffic levels would have been markedly reduced compared to what they potentially could have been if the facilities were occupied at full capacity. In turn this may have led to the perception that traffic flows associated with the former use of the site were significantly less than the proposal. Overall, the Highway Authority has advised that it has considered the traffic and transportation information submitted with the application and is satisfied that the proposal would not have an unacceptable impact on highway safety and that the residual cumulative impacts on the road network would not be severe, having regard to paragraph 111 of the NPPF.
- 9.36 The application would provide 96 covered and secure cycle parking spaces which accords with the Borough's adopted standards. The application also proposes two additional parking spaces within the visitors car park for the SANG being provided at Sunningdale Park. The proposed change in tenure of 3 dwellings within MacKenzie House does not require any additional car or cycle parking.

Environmental considerations

- 9.37 The Council's Interim Sustainability Position Statement (ISPS) and Policies SP2 and QP3 of the emerging Borough Local Plan require developments to be designed to incorporate measures to adapt to and mitigate climate change.
- 9.38 The buildings related to the former use of the application site have been demolished and works have commenced on site. However, the applicant has agreed to submit an energy statement for the development, which would include a calculation of the energy demand and carbon emissions and that, as a minimum, the development shall achieve a reduction of at least 20% against the Target Emission Rate based on Building Regulations Part L 2013 and defined within the Standard Assessment Procedure. If net-zero emissions cannot be achieved on site, the applicant has agreed to provide an offset contribution to the Council's Carbon Offset Fund, unless it is demonstrated that this would undermine the viability of the development. This can be secured by planning condition and with the inclusion of a relevant clause in a s.106 agreement to cover any necessary financial contributions.
- 9.39 In addition to the above, each of the new houses would be provided with electric vehicle charging points and four communal charging points would be provided for the

apartments, with the possibility of further provision subject to local capacity and feasibility. The whole of the development would be provided with high speed internet connection and water reduction methods, such as dual flush WCs and flow regulated taps and showers would be incorporated into the development.

- 9.40 A Flood Risk Assessment has been submitted with the application. As the site is within Flood Zone 1, it is not at risk from fluvial flooding. The main flood risk would be from any increase surface water runoff.
- 9.41 The Lead Local Flood Authority requested additional information with regard to the proposed flood mitigation measures and its response to this additional information is currently awaited and will be reported to the Committee in an update report. Notwithstanding this, the approved scheme was subject to a planning condition requiring full details of the surface water drainage scheme, based on sustainable drainage principles, to be submitted and approved by the Council prior to commencement of the development and, in the circumstances, it is appropriate and necessary that this condition be imposed on any permission granted under the current application.

Ecological issues

- 9.42 Paragraph 174 of the NPPF states new development should minimise impacts on and provide net gains for biodiversity. Similarly, emerging policy NR2 in the BLP outlines that development proposals are expected to demonstrate how they maintain, protect and enhance the biodiversity of application sites. Policy NP/EN4 of the Neighbourhood Plan requires development proposals to seek to enhance biodiversity and, where there is evidence of the existence of protected species, must include mitigation measures to minimise and compensate for any likely impact.
- 9.43 The planning permission granted for the approved scheme, of which the application site forms part, includes a number of conditions to minimise the impact of the development on protected species and to secure biodiversity enhancements across the site, (specifically condition 18 (biodiversity enhancements), 19 (external lighting strategy), 20 (reptile mitigation measures), conditions 21 and 22 relating to badger protection and mitigation measures, 23 (protected species mitigation measures) and 24 (removal of invasive non-native species). In order to enable site clearance under the current permission, conditions in respect of protected species, (the surveys for which were time-sensitive) have been partially discharged with the approved mitigation measures already in place. Accordingly, it is recommended that these mitigation measures are continued to be secured by conditions as previously approved.
- 9.44 Likewise conditions in respect of biodiversity enhancements, an external lighting strategy and removal of invasive non-native species would ensure the proposed development would protect and enhance biodiversity across the site.

Impact on important trees

- 9.45 Policy N6 of the Local Plan requires applications for new development to include a detailed tree survey where existing trees are a feature of the site and, wherever practicable, to allow for the retention of existing suitable trees. In addition, measures to protect retained trees should be included together with appropriate additional tree

planting and landscaping scheme. Policy NP/EN2 of the Neighbourhood Plan states that proposals should seek to retain important or mature trees and, where removal is proposed, a replacement of a similar amenity value should be provided. Additional trees should also be included where possible with an indicative planting scheme demonstrating sustainable planting.

- 9.46 All trees within the application site are covered by an area Tree Preservation Order and the original application 18/00356 was accompanied by a detailed tree survey and arboricultural impact assessment. The extant permission includes a condition requiring a Tree Protection Plan to be submitted and approved prior to the commencement of each phase of the development which, for the phase to which the application site relates, has been approved under conditions application 20/00328.
- 9.47 The current proposal does not involve the removal of any trees over and above that approved under the extant permission. The relationship of the proposed development to the mature tree belt along the western boundary of the site would be improved compared to the approved scheme, and would be protected during construction in accordance with measures set out in the approved Tree Protection Plan. In addition, the submitted drawings demonstrate that the proposed development would be outside the root protection areas of retained trees located further into the site.
- 9.48 It is considered that, subject to conditions relating to tree protection and hard and soft landscaping, the application is acceptable in this respect.

Impact on heritage assets

- 9.49 The application site lies adjacent to a grade II Registered Park and Garden in which Northcote House, a grade II listed building, together with its associated buildings are located. Paragraph 199 of the NPPF states that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.
- 9.50 The application is accompanied by a Heritage Statement and a Landscape and Visual Impact Assessment. The Council's Conservation Officer has advised that the current revised scheme is an improvement on that previously agreed in terms of its design and layout and that the scheme will have no greater impact on the setting, and hence the significance, of the adjacent heritage assets than that previously approved. Accordingly, no objection is raised to the proposal in terms of its impact on heritage assets.

Affordable housing

- 9.51 The previous planning permission 18/00356/FULL for 168 dwellings included 38 affordable flats for shared ownership in Mackenzie House (a block of 41 flats with 3 market flats on the top floor). The 38 affordable homes were only 23% of the total and was reduced by a factor of 0.75 due to existing dwellings on site and applying Vacant Building Credit. The sole tenure of shared ownership was considered acceptable for various reasons including it being impractical to have 3 tenures in a single block which a Registered Provider would not accept (social rent, shared ownership and market).
- 9.52 The current application is for 96 dwellings, an increase of 22 dwellings compared to the extant permission. The 30% affordable housing quantum would provide 7 dwellings and, applying the same 0.75 Vacant Building Credit, reduces the figure to 5 affordable

dwellings. There has been correspondence and a meeting in April with RBWM and the applicant, Berkeley Homes, to highlight and explore various options for delivering the additional 5 affordable homes. An Affordable Housing Statement is included as Appendix 3 to the Planning Statement and it has been agreed that:

- (1) Three additional flats for shared ownership will be included at Mackenzie House (38 + 3 = 41). This would now be a single tenure block of 41 flats and be delivered in Phase 3.
- (2) Two affordable flats will be the subject of a financial contribution in lieu of on-site provision. The formula is contained in Figure 1 of the Affordable Housing Planning Guidance Document 2016. Based on 2x 2-bed flats which each have an open market value of £420,000, the financial contribution would be £290,000.

9.53 The additional affordable homes and financial contribution will be the subject of appropriate clauses in the Section 106 agreement. It is considered that the proposed affordable housing contribution is acceptable given what was agreed under the extant permission.

Other Material Considerations

9.54 An Environmental Statement (ES) was submitted with the previous full planning application 18/00356/FULL, which the application site formed part of. Further to an Environmental Impact Assessment (EIA) Screening Request, officers advised that the current proposal would not constitute EIA development and therefore a new ES would not be required to accompany this application.

9.55 A desk based archaeological assessment accompanied planning application 18/00356/FULL and found that that the site would have limited capacity to yield material of significance and, as such, the overall value of the buried archaeological resource was considered low to moderate. A subsequent archaeological evaluation report submitted to discharge condition 28 of 18/00356/FULL concluded that the low density and low significance of the archaeological material found during the evaluation indicated that further archaeological mitigation in relation to the development proposals would be unnecessary. Accordingly, and in consultation with Berkshire Archaeology, the Council determined that the report's findings were sufficient to fully discharge the archaeological condition and confirmed that no further archaeological mitigation was required. The proposed development will not have any additional archaeological impact than has already been assessed and therefore no further mitigation will be necessary.

9.56 The application site is located within 5km of the Thames Basin Heaths Special Protection Area (SPA). In order to mitigate the additional recreational pressures on the SPA resulting from additional housing development, a Suitable Alternative Green Space (SANG) is required. In this case, the proposal would provide 2.03 hectares of SANG in addition to the previously approved 16.97 hectares, thus a total of 19 hectares of SANG, which would not only provide for the total residential development at Sunningdale Park, but would also provide for other housing developments coming forward in the SPA catchment of the Borough. The application is accompanied by a management plan for the SANG which is acceptable.

Housing Land Supply

9.57 Paragraphs 10 and 11 of the NPPF set out that there will be a presumption in favour of Sustainable Development. The latter paragraph states that:

For decision-taking this means: approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

9.58 Footnote 8 of the NPPF (2021) clarifies that:

'This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74)'

9.59 For the purposes of decision making, currently the starting point for calculating the 5 year housing land supply (5hyr hls) is the 'standard method' as set out in the NPPF (2021). At the time of writing, the Council is unable to demonstrate a 5 year housing land supply with the appropriate buffer. In addition, there are no restrictive policies relevant to the consideration of this application which would engage section d(i) of paragraph 11 of the NPPF. Accordingly, the 'tilted balance' is engaged. The assessment of this and the wider balancing exercise is set out below in the conclusion.

10. COMMUNITY INFRASTRUCTURE LEVY (CIL)

10.1 The development is CIL liable. The net internal area of the development subject to CIL would be 13,697 square metres minus social housing relief (if applicable).

11. VERY SPECIAL CIRCUMSTANCES AND PLANNING BALANCE

11.1 As set out above, the proposal is considered to be inappropriate development within the Green Belt and therefore would only be acceptable if there were very special circumstances to outweigh the harm.

The harms identified in this report are:

- Inappropriate development within the Green Belt which should be given substantial weight.
- Limited harm to the openness of the Green belt which should be given limited weight.
- Limited harm to the character of the area from glimpsed views into the site from Larch Avenue which should be given limited weight.
- Limited harm from a shortfall in private amenity space which should be given limited weight.

The very special circumstances which are considered to exist in this case are:

- The provision of 96 homes which should be given significant weight

- The provision of SANG to provide for the proposed units and 85 additional units supporting housing delivery within the Borough which should be given significant weight.
- The extant planning permission which is a realistic fall back and should be given significant weight.

It is considered that the Very Special Circumstances would therefore outweigh the harms identified in this case and would justify granting planning permission in accordance with the NPPF. There are no adverse impacts of granting planning permission which would significantly and demonstrably outweigh the benefits.

12. APPENDICES TO THIS REPORT

- Appendix A - Site location plan
- Appendix B – Site layout plan
- Appendix C – Crosley Classrooms and The Chapel proposed elevations
- Appendix D – Crosley Hall and The Great Hall proposed elevations
- Appendix E – The Gatehouse proposed elevations
- Appendix F – Scholars Row proposed elevations
- Appendix G – Steuart Dorms and Steuart Library proposed south and west elevations
- Appendix H – Steuart Dorms and Steuart Library proposed north and east elevations

13. CONDITIONS RECOMMENDED FOR INCLUSION IF PERMISSION IS GRANTED

- 1 The development hereby permitted shall be commenced within two years from the date of this permission.
Reason: The proposal will bring forward Suitable Alternative Natural Greenspace (SANG) which will make a significant contribution to SANG provision for the Borough and assist the Council in the delivery of the Borough Local Plan.
- 2 No development shall take place above slab level until details of the materials to be used on the external surfaces, of the development have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out and maintained in accordance with the approved details.
Reason: In the interests of the visual amenities of the area. Relevant Policies Local Plan DG1, H10, H11; Neighbourhood Plan NP/DG3; Borough Local Plan Policy QP3.
- 3 Prior to installation, full details of both hard and soft landscape works shall be submitted to and approved in writing by the Local Planning Authority and these works shall be carried out as approved within the first planting season following the substantial completion of the development and retained thereafter in accordance with the approved details. If within a period of five years from the date of planting of any tree or shrub shown on the approved landscaping plan, that tree or shrub, or any tree or shrub planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes seriously damaged or defective, another tree or shrub of the same species and size as that originally planted shall be planted in the immediate vicinity, unless the Local Planning Authority gives its written consent to any variation.
Reason: To ensure a form of development that maintains, and contributes positively to, the Registered Park and Garden and to the character and appearance of the area. Relevant Policies - Local Plan HG1, DG1.
- 4 The development shall be implemented and maintained in accordance with the Tree Protection Plan and Method Statement approved under 20/00328/CONDIT.
Reason: To ensure the adequate protection of trees. Relevant Policies - Local Plan N6, NP/EN2.
- 5 A detailed servicing strategy, including for refuse and recycling collection for the development shall be submitted to and approved in writing by the Local Planning

Authority. The development shall be carried out in accordance with the approved plans and strategy unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure that the development is provided with adequate facilities that allow it to be serviced in a manner which would not adversely affect the free flow of traffic and highway safety and to ensure the sustainability of the development. Relevant Policies - Local Plan T5, DG1.

- 6 No part of the development shall be occupied until vehicle parking space has been provided in accordance with the approved drawings. The space approved shall be retained for parking in association with the development.

Reason: To ensure that the development is provided with adequate parking facilities in order to reduce the likelihood of roadside parking which would be detrimental to the free flow of traffic and to highway safety. Relevant Policies: Local Plan P4, DG1.

- 7 No part of the development shall be occupied until covered and secure cycle parking facilities have been provided in accordance with the approved details. These facilities shall thereafter be kept available for the parking of cycles in association with the development at all times.

Reason: To ensure that the development is provided with adequate parking facilities in order to encourage the use of alternative modes of transport. Relevant Policies: Local Plan T7, DG1.

- 8 The development shall be carried out in accordance with the Construction Environmental Management Plan (CEMP) approved under application 20/00315/CONDIT.

Reason: In the interests of highway safety, the free flow of traffic and the amenity of the surrounding occupiers. Relevant Policies: Local Plan T5.

- 9 The bespoke SANG shall be fully implemented prior to the occupation of any residential dwelling unless any variation is first agreed in writing with the Local Planning Authority.

Reason: To adequately mitigate the impact of the development on the Thames Basin Heath Special Protection Area.

- 10 Prior to the occupation of any dwelling, details of biodiversity enhancements, to include bird and bat boxes, tiles or bricks on and around the new buildings, and gaps at the base of fences to allow mammals to traverse through the site, shall be submitted to and approved in writing by the Local Planning Authority. The enhancements shall thereafter be implemented and maintained as approved.

Reason: To incorporate biodiversity in and around developments in accordance with paragraph 174 of the NPPF.

- 11 Prior to occupation, a 'lighting design strategy for biodiversity' shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall:

a. Identify those areas/features on site that are particularly sensitive for bats and badgers and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example for foraging; and

b. Show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory. Foraging habitat or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and there shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

Reason: To mitigate the impact of the development on the ecology of the site and to provide biodiversity enhancements in accordance with the NPPF.

- 12 The reptile mitigation measures, as approved under application 18/00356/FULL, shall

be fully implemented throughout the development including the construction phase unless any variation is first agreed in writing with the Local Planning Authority.

Reason: To mitigate the impact of the development on the ecology of the site and to provide biodiversity enhancements in accordance with the NPPF.

- 13 The badger mitigation measures, as approved under application 18/00356/FULL, shall be fully implemented throughout the development including the construction phase unless any variation is first agreed in writing with the Local Planning Authority.

Reason: To mitigate the impact of the development on the ecology of the site and to provide biodiversity enhancements in accordance with the NPPF.

- 14 Prior to installation, a surface water drainage scheme for the development, based on sustainable drainage principles shall be submitted to and approved in writing by the Local Planning Authority. Details shall include:

i. Full details of all components of the proposed surface water drainage system including dimensions, locations, gradients, invert levels, cover levels and relevant construction details.

ii. Supporting calculations confirming compliance with the Non-statutory Technical Standards for Sustainable Drainage Systems, proposed discharge rates and attenuation volumes to be provided. The supporting calculations should be based on infiltration testing undertaken in accordance with BRE365.

iii. Details of the maintenance arrangements relating to the proposed surface water drainage system, confirming who will be responsible for its maintenance and the maintenance regime to be implemented.

The surface water drainage system shall be implemented and maintained in accordance with the approved details thereafter.

Reason: To ensure compliance with the National Planning Practice Guidance and the Non-Statutory Technical Standards for Sustainable Drainage Systems, and to ensure the proposed development is safe from flooding and does not increase flood risk elsewhere.

- 15 Unless otherwise agreed by the Local Planning Authority, development other than that required to be carried out as part of an approved scheme of remediation must not commence until conditions A to B have been complied with. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination to the extent specified by the Local Planning Authority in writing until condition D has been complied with in relation to that contamination.

A. Site Characterisation An investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include: a survey of the extent, scale and nature of contamination; an assessment of the potential risks to: human health property (existing or proposed) including buildings, crops, livestock, adjoining land, groundwaters and surface waters, ecological systems, archaeological sites and ancient monuments: an appraisal of remedial options, and proposal of preferred option(s).

This must be conducted in accordance with DEFRA and the Environment Agency's 'Model procedures for the Management of Land Contamination, CLR 11'.

B. Submission of Remediation Scheme. If required, a detailed remediation scheme to bring the site to a condition suitable for intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken,

proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

C. Implementation of Approved Remediation Scheme. The approved remediation scheme must be carried out in accordance with its terms prior to the occupation of any unit, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report (referred to in PPS23 as a validation report) that demonstrates the effectiveness of the remediation carried out must be produced and submitted within two months of the completion of the development to the Local Planning Authority for written approval.

D. Reporting Unexpected Contamination In the event that contamination is found at anytime when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition A, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition B, which is the subject of the approval in writing of the Local Planning Authority.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, within 2 months of completion of the development, which is subject to the approval in writing of the Local Planning Authority in accordance with condition C.

Reason: To ensure that risks from land contamination to the future users of the land and the neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. Relevant Policy Local Plan NAP4.

16 Prior to above ground works, an energy statement for the development which includes a calculation of the energy demand and carbon dioxide emissions covered by Building Regulations shall be submitted to and approved in writing by the Local Planning Authority. As a minimum the energy performance requirements for the development shall achieve a reduction of at least 20% against the Target Emission Rate (TER) based on the Building Regulations Part L 2013 and defined within the Standard Assessment Procedure (SAP). Where net-zero carbon emissions cannot be achieved on-site for the development, an offset contribution based on the formula set out in the Council's Interim Sustainability Statement, March 2021, shall be made to the Council's Carbon Offset Fund, unless it can be demonstrated this would undermine the viability of the development.

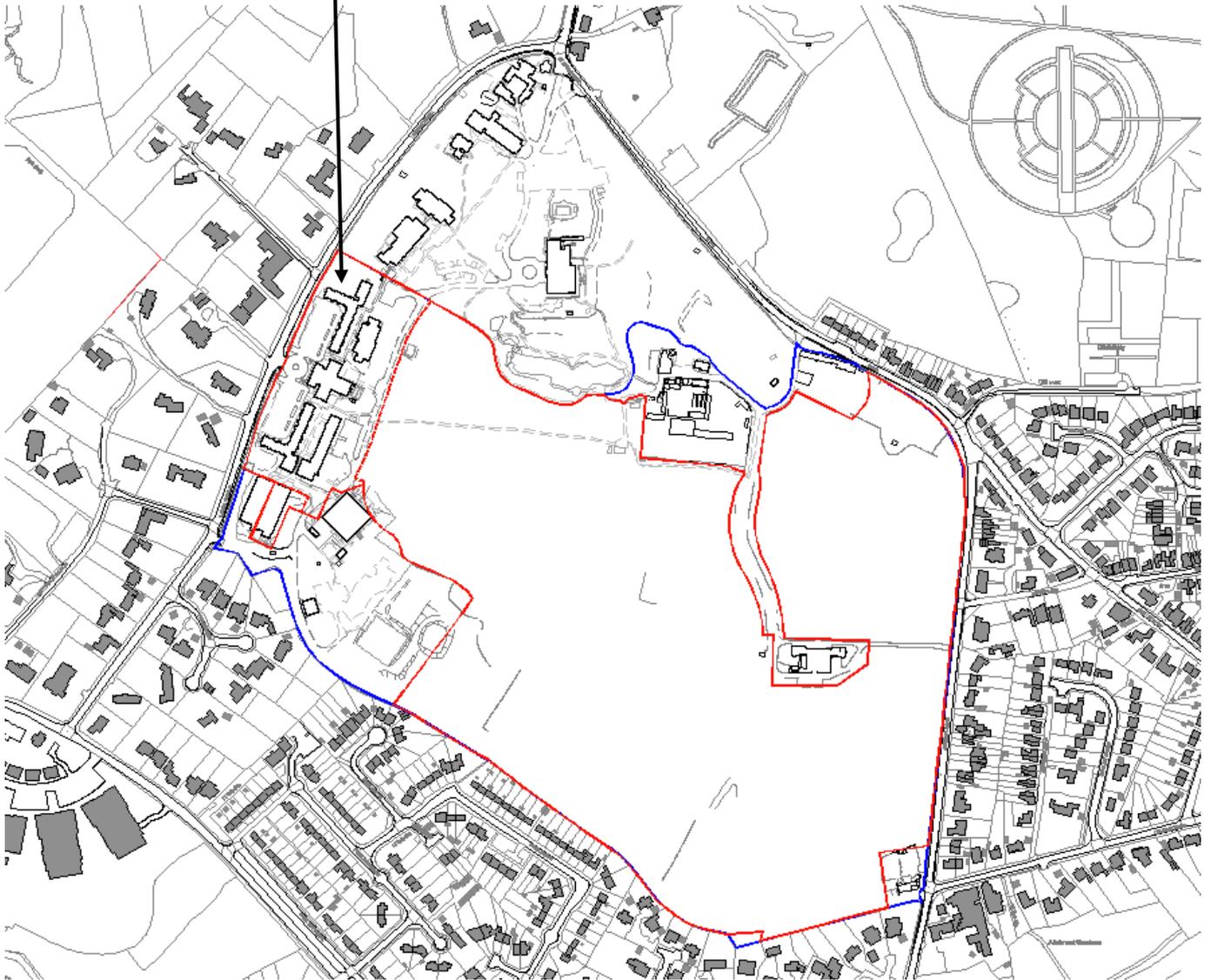
Reason: In order to comply with the Council's Interim Sustainability Statement, March 2021, emerging policy SP2 of the Borough Local Plan, the Council's adopted Environment and Climate Strategy, December 2020 and Chapter 14 of the NPPF, which seek to reduce carbon dioxide emissions from new development in the borough.

17 The development hereby permitted shall be carried out in accordance with the approved plans listed below.

Reason: To ensure that the development is carried out in accordance with the approved particulars and plans.

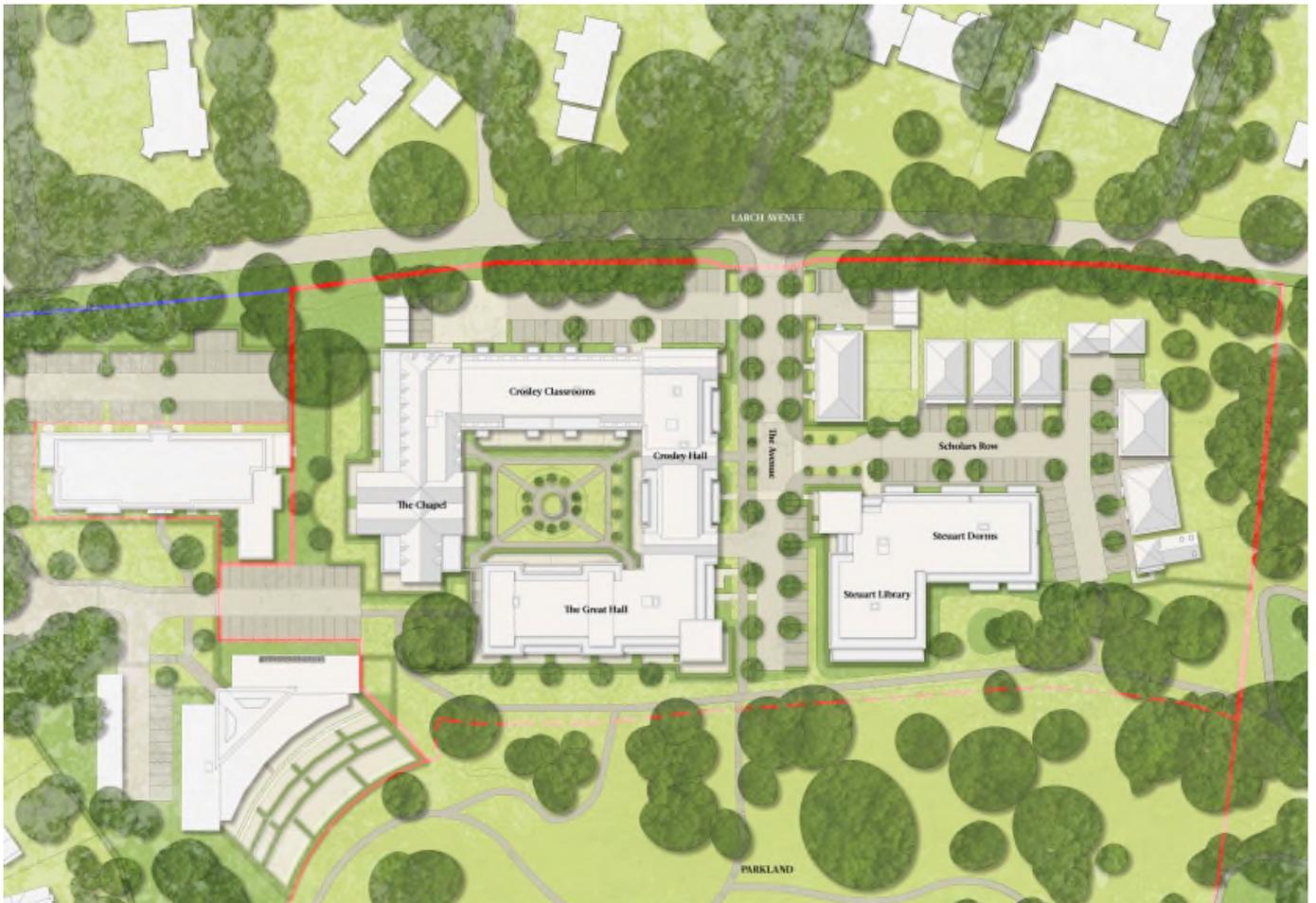
Appendix A
Site Location

Application site



Appendix B

Site Layout



Crosley Classrooms and The Chapel Proposed Elevations



Southern Elevation 3

The Chapel – Facing south towards MacKenzie House



Western Elevation 4

Crosley Classrooms – Facing west towards Larch Avenue

Crosley Hall and The Great Hall



Northern Elevation 1

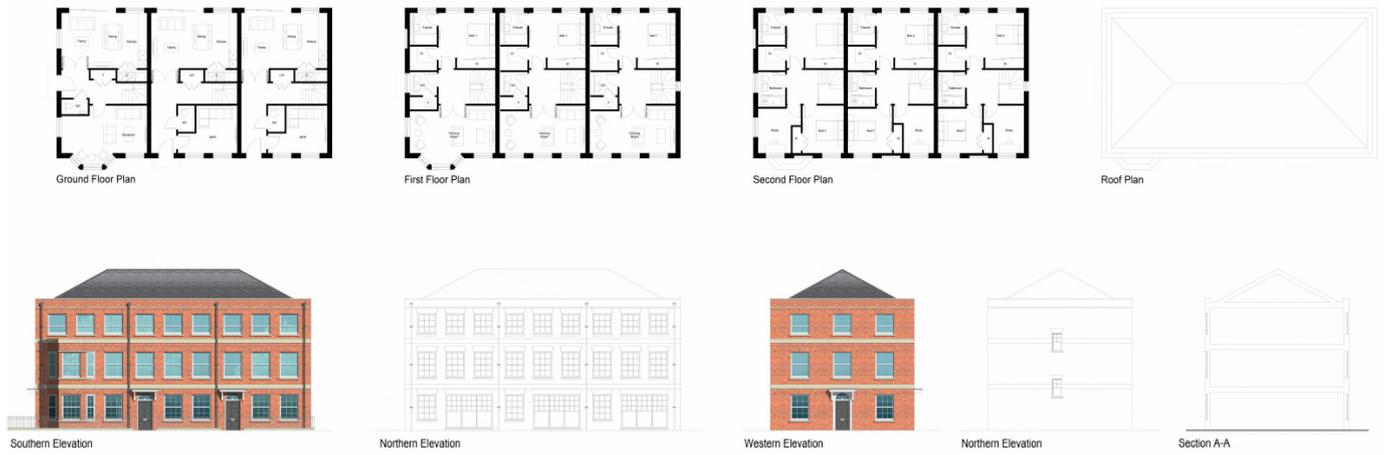
Crosley Hall – Facing north towards Park Avenue



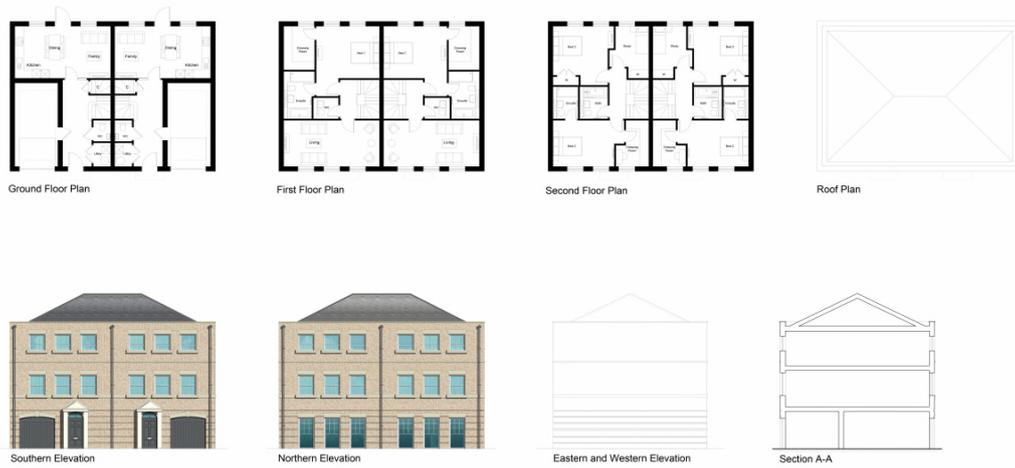
Eastern Elevation 2

The Great Hall – Facing east towards parkland

The Gatehouse & Scholars Row – Semi-Detached Houses



The Gatehouse



Plots 5-8

Scholars Row – Detached Houses



Ground Floor Plan



First Floor Plan



Second Floor Plan



Roof Plan

Plots 1-3



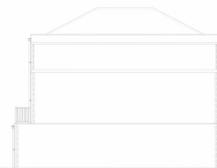
Eastern Elevation



Western Elevation



Southern Elevation



Northern Elevation



Ground Floor Plan



First Floor Plan



Second Floor Plan

Plot 9



Eastern Elevation



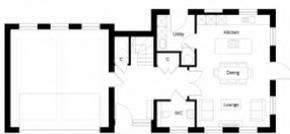
Western Elevation



Southern Elevation



Northern Elevation



Ground Floor Plan



First Floor Plan



Second Floor Plan

Rt

Plot 4



Eastern Elevation



Western Elevation



Southern Elevation



Northern Elevation

Steuart Dorms and The Library Elevations



Southern Elevation 3

Steuart Dorms & Library facing east towards Park Avenue



Western Elevation 4

Steuart Dorms facing west towards Scholars Row

Steuart Dorms and The Library Elevations



Northern Elevation 1

Steuart Dorms & Library facing north towards Scholars Row



Eastern Elevation 2

Steuart Dorms & Library facing east towards parkland