

## DEVELOPMENT CONTROL PANEL

5 October 2023

Item: 2.

<b>Application No.:</b>	23/01062/FULL
<b>Location:</b>	Ditton Manor Ditton Park Road Datchet Slough SL3 7JB
<b>Proposal:</b>	Hotel-led development comprising the conversion, extension and alteration of the existing Manor House and associated buildings, including the North Gatehouse, East Gatehouse, South Gatehouse, Chapel and Granary, to a flexible hotel and wedding/conference venue (Use Class C1 and Sui Generis) with associated ancillary facilities including bar, restaurant and gym/spa; additional two storey hotel accommodation block (Use Class C1); erection of a marquee for wedding/conference use (Sui Generis); demolition and erection of a new one storey community building (Use Class F2); car parking; landscaping; and other associated works.
<b>Applicant:</b>	Ditton Park Property Unit Trust
<b>Agent:</b>	Mr Harry Spawton
<b>Parish/Ward:</b>	Datchet Parish/Datchet Horton And Wraysbury
<b>If you have a question about this report, please contact:</b> Jeffrey Ng on or at <a href="mailto:jeffrey.ng@rbwm.gov.uk">jeffrey.ng@rbwm.gov.uk</a>	

### 1. SUMMARY

- 1.1. The application site measures approximately 54.8 hectares and is within the Metropolitan Green Belt and within Ditton Park, which is a Grade II listed Registered Park and Garden. The Manor House and its associated courtyard walls, stable and gatehouse blocks, the Main Gatehouse, the connecting bridge, the Garden Walls, and Summerhouse are all Grade II listed. The northern part of the site is covered by Ancient Woodland. While the majority of the site is within Environment Agency Flood Zone 1, some of the moated areas are within Flood Zone 2 and 3. Part of the area near the main access of the site and the area next to Manor House is subject to an Area Tree Preservation Order (TPO).
- 1.2. This application seeks full planning permission for a hotel-led development. The proposal comprises the conversion, extension and alteration of the existing Manor House and associated buildings, including the North Gatehouse, East Gatehouse, South Gatehouse, and Granary, to a flexible hotel and wedding/conference venue (Use Class C1 and Sui Generis) with associated ancillary facilities. The proposal also includes the introduction of a two-storey hotel accommodation block (Use Class C1) to the west (rear) of Manor House and a gym and back of house block to the east of Manor House. Outside the moated area, the proposal includes the erection of a marquee for wedding/conference use (Sui Generis) and a woodland parking area to the south of the marquee. The existing Chapel, which is within the curtilage of Manor House will mainly be used for weddings and events but will also be community use. The proposal also includes the removal of the existing scout hut building which will be relocated to a parcel of land, which is at the northern part of the site and is surrounded by Ancient Woodland.
- 1.3. The proposed development is considered to be unacceptable for a number of reasons including 1) inappropriate development within the Green Belt where no very special circumstances exist to outweigh the harm to the Green Belt by virtue of its on

appropriateness, harm to openness, harm to purposes and other identified harm; 2) the scale, form and design of development would result in a prominent and incongruous development which would be harmful to the historic and parkland character of the area; 3) the proposed development would constitute less than substantial harm at the higher end of the scale to the heritage assets and the identified harm is not outweighed by the public benefits identified, 4) failure to provide an acceptable transport statement to demonstrate that any significant impacts on the transport network and highway safety have been mitigated to an acceptable degree, 5) failure to provide acceptable assessment to demonstrate how the direct and indirect impacts on the adjacent ancient woodland are assessed and to provide robust justification for the removal of a number of trees which would have a detrimental impact on the parkland setting, and 6) failure to meet the requirements of SP2 and the Council's interim sustainability statement.

- 1.4. Weighing in favour of the scheme, the proposed development would achieve an onsite 29.84% net gain in biodiversity and generate a number of economic benefits. However, the weight attributed to these benefits would not either individually or cumulatively, be sufficient to outweigh the other harms that are set out above. On this basis of the foregoing, it is therefore recommended that planning permission be refused.

<b>It is recommended that the Committee authorises the Head of Planning to refuse planning permission for the following summarised reasons:</b>	
1	The proposed development would constitute inappropriate development which, by definition, would be harmful to the Green Belt. The proposed development would result in the intensification of the use of the site and the encroachment of substantial built form within the open and rural parking setting. The harm to the Green Belt as a result of inappropriateness with the moderate harm to openness must be afforded substantial weight. No very special circumstances exist to outweigh the harm to the Green Belt by virtue of its appropriateness and harm to openness, and the other harm identified in the subsequent reasons for refusal. The proposed development would be contrary to Section 13 of the National Planning Policy Framework and Policy QP5 of the Borough Local Plan 2013-2033.
2	The proposed development, by virtue of its scale, mass, form, and design would result in a prominent and incongruous form of development which would be harmful to the parkland and historic character of the area. The proposed development is contrary to Policy QP3 of the Borough Local Plan 2013-2033 and Policy DAT2 of Datchet Neighbourhood Plan 2022-2033.
3	The overall heritage harm arising from the proposed development is less than substantial harm at the higher end as the proposed development would fail to preserve the significance and setting of the listed buildings and registered park and garden. There are a number of public benefits arising from the proposed development, but those benefits identified from the proposed development do not outweigh the heritage harm identified. The proposed development would be contrary to Section 16 of the National Planning Policy Framework and Policy HE1 of the Borough Local Plan 2013-2033.
4	In the absence of any existing traffic data provided in the transport statement, there is a lack of information to demonstrate that any significant impacts from the proposed development on the transport network and highway safety have been mitigated to an acceptable degree. The proposed development fails to demonstrate that there would be an acceptable impact on highway safety the local road network. Therefore, the proposed development is contrary to Section 9 of the National Planning Policy Framework and Policy IF2 of the Borough Local Plan 2013-2033.

5	The proposed development fails to provide sufficient evidence to demonstrate how the direct and indirect effect of the potential increasing levels of activities would impact to the adjacent ancient woodland. Furthermore, the proposed removal of a number of existing trees would have a detrimental impact on the parkland setting and their removal is not fully justified. The proposed development is contrary to Section 15 of the National Planning Policy Framework and Policy NR3 of the Borough Local Plan 2013-2033.
6	The proposed development includes the provision of a number of new buildings to support a hotel and community development. In the absence of financial provision towards the Council's Offset Fund, the likely adverse impact of climate change has not been overcome. The application fails to meet the requirements of the Council's Interim Sustainability Position Statement about climate change by Policy SP2 of the Borough Local Plan 2013-2033.

## **2. REASON FOR COMMITTEE DETERMINATION**

- 2.1. 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 Committee as the application is for major development.

## **3. THE SITE AND ITS SURROUNDINGS**

- 3.1. The application site measures approximately 54.8 hectares and is within Metropolitan Green Belt and within Ditton Park, which is a Grade II listed Registered Park and Garden. The Manor House and its associated courtyard walls, stable and gatehouse blocks, the Main Gatehouse, the connecting bridge, the Garden Walls and Summerhouse are also Grade II listed. The northern part of the site is covered by Ancient Woodland. While the majority of the site is within Environment Agency Flood Zone 1, some of the moated areas are within Flood Zone 2 and 3. Part of the area near the main access of the site and the area next to Manor House is subject to an Area Tree Preservation Order (TPO).
- 3.2. The site is located east of the Botanica Ditton Park employment site, which is a designated Established Employment site under Policy ED2 of Borough Local Plan 2013-2033. Currently, the only vehicular access is from Ditton Park Road, where Ditton Park has various pedestrian entrances, including the one to the north of the site which connects to Cedar Way and a bridge connecting to the adjacent Botanica Ditton Park employment site. The application site is also within the setting of a number of other Grade II listed buildings along Ditton Park Road, including the Ditton Farmhouse, its associated Barn and Granary.

## **4. KEY CONSTRAINTS**

- 4.1 The key site designations and constraints are listed below:
- Grade II listed buildings, including the Manor House and its associated buildings and structures
  - Grade II listed registered park and garden
  - Metropolitan Green Belt
  - Ancient Woodland
  - Tree Preservation Order
  - Area of Archaeological Significance and Archaeological Remains
  - Sharp Sand and Gravel minerals safeguarding area
  - Environment Agency Flood Zones 2 and 3

- Red impact risk zone for great crested newts
- National and RBWM Cycle Network

## **5. THE PROPOSAL**

- 5.1. This application seeks planning permission for a hotel-led development with the provision of 132 bedrooms in total and associated facilities. The application can be split into two key areas, namely within the moated area and outside the moated area.

### Within the moated area

- 5.2. The proposal comprises the conversion of a number of existing buildings with internal alterations. The existing Manor House will be converted to a hotel to provide 33 bedrooms and associated facilities including bar, restaurant, and meeting rooms. The existing Northern Gatehouse will be converted into a spa facility. The Eastern Gatehouse will be converted into a storage and site security facility. The Southern Gatehouse will be converted to provide conference and wedding venue facilities.
- 5.3. The proposal also includes the removal of an existing marquee and the introduction of a two-storey L-shaped accommodation block to the west of Manor House, which will provide 99 bedrooms and associated facilities including meeting rooms. With the new accommodation block, it will allow for a new courtyard and garden to be created to the west of Manor House. To the east of the Manor House, a new gym and back to house block will be proposed to provide a gym facility and a new service area to support the operation of the hotel. The proposed block will have a setback from the existing garden wall so a landscaped garden will be created between the wall and the new block. It is understood that the gym/spa facility will also be publicly accessible.

### Outside the moated area

- 5.4. The proposal includes the erection of a marquee for wedding/conference use (Sui Generis) at the location of an existing scout hut building. The existing access will be altered to accommodate the provision of a new service area to support the new marquee. The existing parking area within the moated area will be removed and replaced by a woodland parking area to the south of the new marquee. The existing Chapel, which is within the curtilage of Manor House will mainly be used for weddings and events but will also be community use.
- 5.5. The proposal also includes the removal of the existing scout hut building which will be relocated to a parcel of land, which is at the northern part of the site and is surrounded by Ancient Woodland.

## **6. RELEVANT PLANNING HISTORY**

- 6.1. Ditton Park has a lengthy planning history. Most of these cases are related to the adjacent employment site so they are not relevant to this planning applications.
- 6.2. In 1997, planning permission (97/75585/FULL) was granted for European Headquarters office building of 23,230sqm and change use of Ditton Manor House to D1 for an education/training centre with ancillary offices, access, parking, landscaping/highway works (Class D2). A listed building consent (97/75586/LBC) was also granted for the alteration and refurbishment of Ditton Park Manor House to provide an education and training centre including demolition of ancillary outbuildings.

- 6.3. Based on the Council's record, the existing marquee, which is located to the west of Manor House, is not subject to any planning permission

At the time of writing this report, a Listed Building Consent (23/01063/LBC) application was received for the Consent for Hotel-led development comprising the conversion, extension and alteration of the existing Manor House and associated buildings, including the North Gatehouse, East Gatehouse, South Gatehouse, Chapel and Granary, to a flexible hotel and wedding/conference venue (Use Class C1 and Sui Generis) with associated ancillary facilities including bar, restaurant and gym/spa; additional two storey hotel accommodation block (Use Class C1); erection of a marquee for wedding/conference use (Sui Generis); demolition and erection of a new one storey community building (Use Class F2); car parking; landscaping; and other associated works. It is still pending for decision.

## 7. DEVELOPMENT PLAN

- 7.1. The main relevant policies are:

### Adopted Borough Local Plan 2013-2033

Issue	Policy
Spatial Strategy for the Royal Borough of Windsor and Maidenhead	SP1
Climate Change	SP2
Sustainability and Placemaking	QP1
Green and Blue Infrastructure	QP2
Character and Design of New Development	QP3
Development in Rural Areas and the Green Belt	QP5
Strengthening the Role of Centres	TR6
Visitor Development	VT1
Historic Environment	HE1
Managing Flood Risk and Waterways	NR1
Nature Conservation and Biodiversity	NR2
Trees, Woodlands and Hedgerows	NR3
Environmental Protection	EP1
Air Pollution	EP2
Artificial Light Pollution	EP3
Noise	EP4
Contaminated Land and Water	EP5
Infrastructure and Developer Contributions	IF1
Sustainable Transport	IF2
Rights of Way and Access to the Countryside	IF5

## **Adopted Central and Eastern Berkshire Joint Minerals and Waste Plan 2021-2036**

<b>Issue</b>	<b>Policy</b>
Safeguarding sand and gravel resources	M2
Locations for sand and gravel extraction	M4

## **Adopted Datchet Neighbourhood Plan 2022-2033**

<b>Issue</b>	<b>Neighbourhood Plan Policy</b>
High Quality Design and Character	DAT2
Views	DAT5
Biodiversity	DAT6
Provision for Wildlife in New Development	DAT8
Flooding Drainage and Water Efficiency	DAT10
Key Movement Routes	DAT12

## **8. MATERIAL PLANNING CONSIDERATIONS**

### **National Planning Policy Framework Sections (NPPF) (2023)**

Section 2 – Achieving sustainable development

Section 4 – Decision-making

Section 8 – Promoting healthy and safe communities

Section 9 – Promoting Sustainable Transport

Section 11 – Making effective use of land

Section 12 – Achieving well-designed places

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

### **Supplementary Planning Documents**

- RBWM Borough Wide Design Guide
- RBWM Sustainable Design and Construction SPD
- RBWM Planning Obligation and Developer Contributions SPD
- RBWM Parking Strategy

### **Other Local Strategies or Publications**

- Natural England and Forestry Commission Ancient woodland, ancient trees and veteran trees: standard advice for making planning decisions
- RBWM Corporate Strategy
- RBWM Environment and Climate Strategy
- RBWM Interim Sustainability Position Statement

## 9. CONSULTATIONS CARRIED OUT

### Comments from interested parties

- 9.1. The planning officer posted a site notice advertising the application at the site on 17.05.2023 and the application was advertised in the Local Press on 18.05.2023.
- 9.2. 9 neighbours were notified directly, and 8 letters and a petition were received in total. 1 letter was received supporting to the application, 7 letters were received objecting to the application including one petition which was signed by 29 local residents, summarised as:

Comment		Where in the report this is considered
1	Concerns over the scale of the proposed accommodation block and it is not sympathetic to the existing buildings.	Section 10 (iv)
2	Concerns over the new marquee would have an adverse visual impact.	Section 10 (iv)
3	Concerns over the new location of the marquee as it will move closer to the existing residential properties.	Section 10 (vi)
4	Concerns over the permanent erosion of the setting and significance and character of the Registered Park and Garden.	Section 10 (v)
5	Concerns over the increase in large commercial vehicles movement	Section 10
6	Concerns over the noise pollution from the proposed wedding venue	Section 10
7	Concerns over the proposed parking area will have a negative visual impact to amenity.	Section 10
8	Concerns over the existing flood at the new marquee location.	Section 10
9	Concerns over the proposed development would constitute inappropriate development within Green Belt.	Section 10
10	Concerns over there is a lack of details in the applicant's recommended maintenance plan.	Section 10
11	Concerns over there is a lack of security plan to be provided in this planning application.	Section 10
12	Concerns over the potential increase in anti-social behaviour after the removal of fences and gate	Section 10

### Publicity of the planning application

- 9.3. Concerns have been expressed related to the publicity of the planning application. As the site is immediately adjacent to the Slough administrative boundary, the Council is not able to send any notification letters to residents who are within Slough.
- 9.4. Notwithstanding, two site notices have been posted at the site, where one of the site notices is at the northern entrance of Ditton Park. Slough Borough Council has also been formally consulted on this application and residents who reside within Slough can still make their representations to Slough Borough Council for their consideration. This is the normal process which is followed in these circumstances.

## Statutory Consultees

<b>Consultees</b>	<b>Comments</b>	<b>Where in the report this is considered</b>
Slough Borough Council	Requests the provision of TRICS survey data and there is a lack of mitigation for the Ditton Park Road/A4 Bath Road junction and the impact of increased vehicle movements on Ditton Park Road.	Section 10
Natural England	No objection subject to advice related to ancient woodland, ancient and veteran trees.	Section 10
The Berkshire Garden Trust	The proposal fails to demonstrate how it can preserve or enhance the character of the Registered Park and Garden and the setting of the listed buildings with respect to the significance of the historic environment.	Section 10
Environment Agency	Standard advice received.	Noted.

## Consultees

<b>Consultees</b>	<b>Comments</b>	<b>Where in the report this is considered</b>
RBWM Conservation	Objection: the proposed development would lead to a less than substantial harm at a higher end to the setting of the Registered Park and Garden and the setting and significance of the listed buildings.	Section 10
RBWM Ecology	No objection subject to recommended condition.	Section 10
RBWM Public Rights of Way	No objection as the proposed development would improve the site permeability and new pedestrian/cycling routes are provided to link to the existing routes.	Section 10
RBWM Environmental Protection	No objection subject to recommended conditions related to contaminated land, artificial light scheme, noise control and site-specific construction environmental management plan.	Section 10
RBWM Highways	Objection to the proposed development and comments received related to the draft travel plan.	Section 10
Berkshire Archaeology	No objection subject to a condition requiring the submission of a programme of archaeological work.	Section 10
Naturespace Partnership	No objection subject to recommended condition.	Section 10
Thames Valley Police	Unable to support the application.	Section 10



Historic England	Do not wish to comment.	Noted.
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**Others (e.g., Parish and Amenity Groups)**

<b>Groups</b>	<b>Comments</b>	<b>Where in the report this is considered</b>
Datchet Parish Council	No objection but suggesting there are planning conditions to restrict noise and the impacts to residents and wildlife around the site. The marquee should be positioned to ensure that the views from the listed building would be avoided, and the noise would be reduced by an appropriate tree lined area or an aesthetic hedging.	Section 10

**10. EXPLANATION OF RECOMMENDATION**

10.1. The key issues for consideration are:

- i) Green Belt
- ii) Principle of Development
- iii) Climate Change and Sustainability
- iv) Design and Character
- v) Impact on the setting of Heritage Assets
- vi) Impact on Neighbouring Amenity
- vii) Trees and Woodland
- viii) Ecology and Biodiversity
- ix) Highways and Parking
- x) Flood Risk and Sustainable Drainage
- xi) Environmental Health
- xii) Very Special Circumstances
- xiii) Other Considerations

**i) Green Belt**

10.2. Paragraph 137 of the National Planning Policy Framework (NPPF) sets out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

**(a) Inappropriate development in the Green Belt**

10.3. Paragraph 149 of the NPPF states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Paragraph 149 sets out a number of exceptions to inappropriate development including the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; and the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces. Paragraph 150 continues to set out that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not

conflict with the purposes of including land within it, including the re-use of buildings provided that the buildings are of permanent and substantial construction.

- 10.4. The proposal is seeking to introduce a hotel development to the site by converting and extending the existing Manor House and its associated buildings and by the construction of a new two-storey hotel accommodation block, a gym and back of house extension and a new marquee for wedding/conference use.
- 10.5. The following table compares the existing and proposed footprint of the development:

	<b>Existing floorspace (sqm)</b>	<b>Proposed floorspace (sqm)</b>
Manor House	3,578	3,578
North Gatehouse	353	353
South Gatehouse	992	992
Granary	119	119
East Gatehouse	82	82
Chapel	73	73
Scout Hut	214	192
Accommodation Block	--	3,818
Gym and Back of House Extension	--	1,134
Marquee	--	1,139
<b>Total</b>	<b>5,411</b>	<b>11,480</b>

*Accommodation block and Gym and back of house extension*

- 10.6. From the table above, it shows that the total floorspace of both the accommodation block and the gym and back of house extension is 4,952sqm, which is significantly larger than the existing Manor House, which is 3,578sqm. Such substantial increases in built form would result in disproportionate additions over and above the size of the original Manor House. As such, the proposed development would constitute inappropriate development in the Green Belt.

*Conversion of Manor House and its associated buildings to hotel development*

- 10.7. The Grade II listed Manor House and the associated buildings within its curtilage, including North Gatehouse, South Gatehouse, Granary, East Gatehouse, and Chapel are all permanent buildings. In this case, the proposed development is seeking to convert those buildings to provide a new hotel and associated hotel facilities. However, paragraph 150 sets out that such development can only be considered appropriate if it can preserve the openness of the Green Belt and not conflict with the purposes of including land within the Green Belt, which will be discussed later in this report.

*Erection of a Marquee*

- 10.8. The proposed development is seeking to remove the existing Scout Hut building and to erect a new marquee. The replacement marquee is clearly not in the same use as the existing Scout Hut building. The proposed floorspace of the marquee would also be 1,139sqm, which is significantly larger than the floorspace of the existing Scout Hut

building of 192sqm (i.e., 493% increase). As such, the proposed development would constitute inappropriate development in the Green Belt.

(b) Impact on openness of the Green Belt

- 10.9. As inappropriate development in the Green Belt, the proposal is, by definition, harmful to openness. Paragraph 001 of the Planning Practice Guidance (PPG)<sup>1</sup> sets out that in assessing the impact of a proposal on the openness of the Green Belt, openness is capable of having both spatial and visual aspects, and that the permanence and degree of activity likely to be generated should be considered.

*Spatial aspects*

- 10.10. The proposed development is seeking to introduce a hotel development to the site with a number of new buildings to support the use. The proposed development is also seeking to open some of its hotel facilities to local residents. The proposal would inevitably increase the degree of activity to be generated by the new hotel and community use due to the increase in both overnight visitors and day visits to the venue.
- 10.11. The proposed development is seeking to introduce an accommodation block and a gym and back of house extension to the west and the east of Manor House respectively within the moated area. The L-shaped built form of the accommodation block and the proposed gym and back of house extension, cumulatively will introduce a considerable amount of built form to the site (circa 5,000 sqm). The existing location of the accommodation block hosts an unauthorised marquee building and a landscaped area with parkland setting. The existing location of the gym and back of house existing hosts an open courtyard parking area. By virtue of the proposed floor area, spread, mass and height of the proposed new development into open areas of the site, the proposal would result in a significant loss of openness around the existing Manor House. This significant volumetric increase in built form would result in a physical loss of openness to the Green Belt.
- 10.12. Furthermore, the proposed development is seeking to introduce a new parking area to the south of the proposed marquee, where it is currently an undeveloped greenfield with some hardstanding for informal parking and to convert the existing vacant chapel building to a mixed events and community use building. The new parking area and the new mixed use of chapel building will increase the degree of activity and introduce an urbanising feature in that area. While it is not clear from the proposal how the Chapel building will be operated to facilitate the events and community use, the proposal inevitably would increase the level of activity of the building, given that it is currently vacant. The introduction of formal parking area to the undeveloped greenfield and the reuse of the chapel building, would result in an increase in the physical presence of people and vehicles (both stationary and in transit) which would also result in the loss of openness to the Green Belt in spatial terms.
- 10.13. The proposed development is also seeking to introduce a new marquee for events and conferencing. The marquee will be located at the existing location of the Scout Hut building but with considerable increase in floorspace. Considering the floor area and mass of the marquee, when compared to the existing Scout hut building, it would have a materially greater impact on the openness of the Green Belt.

*Visual aspects*

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<sup>1</sup> Reference ID: 64-001-20190722

- 10.14. The application site is within a well-established parkland. The Grade II listed Manor House and its associated buildings are sited within the moated area with mature natural screening. The moated area is currently secured by fencing and gates. Outside the moated area, the chapel building, which is within the curtilage of Manor House sits comfortably to the southeast of the moated area. Currently, the vehicular access to Ditton Park is gated and restricted to private residents and Manor House occupants only. Ditton Park has a number of pedestrian entrances, and they are all gated.
- 10.15. Within the moated area, the proposed accommodation block will be located at the existing location of the marquee which does not have planning permission. The accommodation block will be highly visible from within the site as it is immediately adjacent to the Manor House within an open area of land (apart from the unauthorised marquee). The introduction of the accommodation block would lead to a permanent visual loss of the openness of the Green Belt when viewed from within the grounds. Turning to the gym and back of house extension block, this building would still be visible from the rear and north of the Manor House and partially visible from the site frontage, projecting above the existing wall and would also lead to a permanent visual loss of the openness of the Green Belt. Considering the moated area is screened by natural vegetation, the new buildings would be largely screened from the outside of the moated area and from the wider Ditton Park. However, there are public footpaths/cycle paths running through Ditton Park and the new development would be visible from certain vantage points within the parkland, including to the north and west.
- 10.16. Outside the moated area, the new parking area will be located at an undeveloped greenfield with some hardstanding for informal parking. The proposed new parking area will lead to a permanent removal of the existing undeveloped greenfield. The proposed marquee will be located at the existing location of the Scout Hut building but with considerable increase in floorspace. Currently, the Scout Hut building is setback from the main access to Manor House and is screened by natural vegetation. The proposed marquee will be substantially larger than the existing Scout Hut building and it will be located towards the access. Though some plantings will be introduced to create a landscaped area between the proposed marquee and the access, the proposed marquee can be visible within Ditton Park. It therefore would constitute a permanent visual harm to the openness of the Green Belt.

#### *Community building*

- 10.17. The proposed development would also introduce a new community building at the northern boundary of the site. While the area is currently an undeveloped greenfield and is surrounded by Ancient Woodland, the proposed development would introduce a new use to the area and increase the level of activity of that area. While the vehicular access of the new community building will use the existing one, it means that the proposed development will generate extra vehicular movements on that existing lane, which is currently to be used by residents only. Also the proposal includes the introduction of a storage area to the north of the new community building. It will lead to some loss of existing trees. The building will be visible from outside Ditton Park. The introduction of a new community building, including its associated storage and parking, will have both spatial and visual harm to the openness of the Green Belt

#### Impact on purposes of the Green Belt

- 10.18. One of the purposes of the Green Belt is to assist in safeguarding the countryside from encroachment. In this case, although the proposed development involves a conversion of Manor House to a hotel use, the proposed development would include an

introduction of an accommodation block and a gym and back of house extension block within the moated area, a new parking area and a new marquee outside the moated area and a new community building at the northern boundary of the site. The proposed development would encroach the countryside area and would conflict with this purpose of the Green Belt.

### Conclusion

10.19. Overall, it is concluded that the proposed development would clearly not fall into any of the exceptions set out in Paragraph 149 or 150 of the NPPF (which is echoed in Local Plan policy QP5) and is therefore inappropriate development in the Green Belt. In addition to the harm by virtue of inappropriateness, the proposed would result in actual harm to the openness of the Green Belt both spatially and visually. Furthermore, the proposal would conflict with one of the purposes of the Green Belt. This cumulative harm to the Green Belt is afforded substantial weight and could only be approved if 'Very Special Circumstances' (VSC) exist that outweigh the harm to the Green Belt and any other harm.

### **ii) Principle of Development**

10.20. The proposal is seeking to introduce a hotel development to the site by converting and extending the existing Manor House and associated buildings and by the construction of a new two-storey hotel accommodation block and a new marquee for wedding/conference use. The submitted planning statement sets out that the site has been used for conference centre since 2019, however, the existing building cannot accommodate the demand for 24-hour conferencing as there is no provision of bedroom facilities.

### Hotel Development

10.21. Paragraph 87 of the NPPF sets out that local planning authorities should apply a sequential test to planning applications for main town centre uses which are not in an existing centre. Paragraph 91 continues to set out that an application which fails to satisfy the sequential test should be refused.

10.22. Policy TR6 of the BLP sets out that main town centre uses must be located within the centres defined in the hierarchy of centres where sites are suitable, viable and available. Planning applications for main town centre uses which are neither in a defined centre nor in accordance with policies of the Local Plan will be subject to the sequential test. Policy TR6 also sets out that development proposals for retail, leisure, and office development, larger than the threshold set out in Policy TR6 (i.e., leisure development of 2,500 square metres), located outside defined centres must be accompanied by an assessment of their impact on the vitality and viability and investment in defined centres within their catchment.

10.23. Policy VT1 of the BLP requires that development proposals for visitor development will be expected to:

- a) be consistent with the sequential approach to site selection within that settlement or as exception show evidence that the proposed development is locationally specific and consistent in terms of scale, impact, and function with their location,
- b) contribute positively to the character of the area, the amenity of surrounding land uses and the retention and enhancement of heritage assets,

- c) contribute, where appropriate, towards town centre rejuvenation and environmental enhancement and a sustainable, safe, attractive, and accessible environment

#### *Town Centre Sequential Test*

- 10.24. This application is accompanied by a town centre policy assessment Report, which is prepared by Alyn Nicholls Chartered Town Planner, on behalf of the applicant. A sequential assessment is included in the applicant's report. The report sets out that the total floorspace to be required for a hotel development with ancillary facilities including a gym and spa, conferencing and welling facilities is approximately 11,600 square metres. While it is considered that the figure is slightly different from the one of approximately 11,133 square metres<sup>2</sup> set out in the submitted planning statement, the minimum floorspace required for the hotel development is approximately 11,100 to 11,600 square metres. With the adoption of 20% flexibility, the report sets out that the minimum floorspace requirement is approximately 8,900 square metres. The other key feature of the proposed development is that the site lies within a parkland setting, where the site area is 55 hectares and an area of 3 hectares is then used in the sequential test after considering the site area of the hotel developments nearby.
- 10.25. The site search is based on a site to accommodate a hotel and associated facilities of approximately 8,900 square metres on a site of approximately 3 hectares. A number of different resources have been used to inform the site search to identify potential sites including BLP site allocations, Slough Local Plan allocations, and internet search of land and premises being marketed for sale.
- 10.26. Three BLP allocated sites, namely AL29 Minton Place, Windsor, AL30 Windsor and Eton Riverside Car Park, Windsor and AL31 King Edward VII Hospital, Windsor have been identified but they all fall outside the search criteria as the site area is below the search criteria. The search also went to the sites identified through a call for sites process during the review of the Borough Local Plan making process. Five sites were identified but none of the sites meet the size threshold of 3 hectares.
- 10.27. The search then went to the Slough Local Plan allocated sites. Five sites were identified and two sites, namely SSA13 Heart of Slough comprehensive regeneration site and SSA14 Queensmere and Observatory shopping centres met the criteria of the site area. Regarding SSA13 allocated site, the applicant's assessment report sets out that an outline planning permission was previously granted for a mixed-use development of that site, subject to the provision of 1,300 units, office floorspaces, education/innovation use and retail floorspaces. However, it is noted that both sites will not be available during the emerging Slough local plan period. The search also went to internet search and three sites were identified. However, all of the identified sites are too small and do not meet the search criteria.
- 10.28. It is noted that the sequential assessment has been carried out in a robust manner. As such, it has been demonstrated that there are no sequentially preferable sites within town centres in this particular case. The sequential assessment has been passed in this regard.

#### *Impact Test*

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<sup>2</sup> The total floorspace of 11,480sqm excludes the Easte Gatehouse of 82sqm, Chapel of 73sqm and Scout Hut of 192sqm.

- 10.29. The application is also accompanied by an impact test to assess the impact on the vitality and viability of and investment in defined centres within their catchment. Given that the leisure development within the proposed development falls below the required threshold to produce an impact assessment and there is no requirement of a hotel development to produce an impact assessment, an impact test is therefore not required in this regard.

#### Community Development

- 10.30. Policy IL6 of the BLP sets out that proposals for new or improved community facilities which meet the needs or aspirations of local residents and visitors will be supported. Where an assessment identifies specific needs in the local area, proposals to meet that local need will be supported when they are located in areas that are accessible by walking, cycling or public transport. Policy IL6 also sets out that existing community facilities should be retained, improved and enhanced. Applications for change of use or redevelopment will therefore be resisted, unless evidence can be provided to show that the facility is not needed, not economically viable and is no longer required to meet the needs of the local community.

#### *Relocation of the Scout Hut building*

- 10.31. The proposed development includes the relocation of the existing community building outside of the moated area of Ditton Manor to the northern edge of Ditton Park to allow the erection of a marquee to provide a venue for holding any events or functions. The existing building is currently occupied by Datchet Sea Scout on an informal basis. A letter from Datchet Sea Scouts is provided in this application to support the relocation proposal as the existing building is needed to be repaired and is not economically viable. It also sets out that there is community benefit provision for young people in the local area. The submitted planning statement also sets out that the storage and car parking facilities are inadequate at the current site.
- 10.32. It is understood that the fundamental reason for the relocation is so the location of the existing building can be used for the erection of a marquee to support the hotel development. This is not considered to be the evidence as required under Policy IF6 to justify the redevelopment proposal. There is also no evidence provided in this application to demonstrate how the redevelopment proposal would be more financially viable than repairing the existing building. Notwithstanding, the proposed development includes the provision of a new replacement community building with associated facilities which will be located at the northern boundary of the site. While the GIA of the new community building is 192 sqm which is slightly smaller than the existing building of 214 sqm, there is no loss of a community building at the site.
- 10.33. In terms of accessibility, vehicles will have to continue to use Conduit Way through the main vehicular entrance of Ditton Park. However, the new location will be adjacent to the pedestrian entrance of Ditton Park connecting the established residential area to the north, therefore it is considered that members of the public can easily get into the building by the pedestrian entrance of Ditton Park.
- 10.34. In terms of meeting the identified community need, the existing community building is occupied by Datchet Sea Scouts under an informal arrangement. It is considered that Datchet Sea Scouts will continue to use the new community building.
- 10.35. There is no objection in principle to the relocation of the existing Scout Hut building as there is no overall loss of community facility, given that a new building will be provided

within the site. Considering the new location of the community building, it is connected to the residential area to the north of the site and vehicles will be able to use Conduit Way to get to the proposed community building.

- 10.36. Given that the proposed location of the building will be within the area to be surrounded by the designated Ancient Woodland, the principle of having a Scout Hut building in the proposed location can only be accepted if the proposed development would not have any adverse impacts to the adjacent Ancient Woodland, which will be discussed later in this Report.

*Ancillary hotel facilities to be made publicly accessible*

- 10.37. The proposed development is seeking to open the ancillary gym and spa facilities of the hotel and the chapel will be made publicly accessible. The submitted planning statement sets out that it is supported by the local communities. According to the submitted Statement of Community Involvement, 84% of the respondents agree or strongly agree that local community can also use those facilities.
- 10.38. While the proposed community use of the ancillary gym and spa facilities and the chapel building is supported, Policy IF6 requires the facility should be designed to maximise use by local communities. It is not clear from the submitted information how these facilities can be practically operated to be used by both future hotel guests and local communities.

Minerals Safeguarding Area

- 10.39. Policy M2 of the Central and Eastern Berkshire Joint Minerals and Waste Plan 2021-2036 (JMWP) sets out that non-minerals development in the minerals safeguarding area may be permitted if it can be demonstrated through the preparation of a Mineral Resources Assessment, that the option of prior extraction has been fully considered as part of an application, and prior extraction, where practical and environmentally feasible, is maximised, taking into account site constraints and phasing of development; or it can be demonstrated that the mineral resources will not be permanently sterilised; or it would be inappropriate to extract mineral resources in that location, with regard to other policies in the wider Local Plans.
- 10.40. Policy M4 then sets out that proposals for new sites not outlined in the Policy will be supported in appropriate locations including they are situated within the Area of Search.
- 10.41. The application site is within the sand and gravel safeguarding area and a minerals resources assessment (MRA) is required to support the application. Notwithstanding, it is understood that there are a number of designations within the site, including Ancient Woodland, Listed Buildings and Registered Parks and Gardens. The application site is excluded from the Area of Search as these areas should be avoided for development to be sustainable. Considering the number of designations within the site and, a pragmatic approach should be adopted, and it is not considered that the requirement of a MRA would be reasonable in this regard.

**iii) Climate Change and Sustainability**

- 10.42. The Climate Change Act 2008 (CCA2008) imposes a duty to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline. Paragraph 152 of the NPPF states that the planning system should support the



transition to a low-carbon future in a changing climate by contributing to a radical reduction in greenhouse gas emissions, minimising vulnerability and improving resistance, and supporting renewable and low-carbon energy and associated infrastructure. The Royal Borough of Windsor and Maidenhead declared a climate emergency in June 2019, and the Council intends to implement a national policy to ensure net-zero carbon emissions can be achieved by no later than 2050.

- 10.43. In December 2020, the Environment and Climate Strategy was adopted to set out how the Borough will address the climate emergency. These are material considerations in determining this application. The strategy sets a trajectory which seeks a 50% reduction in emissions by 2025.
- 10.44. While a Sustainability Supplementary Planning Document will be produced, the changes to national and local climate policy are material considerations that should be considered in the handling of planning applications and achievement of the trajectory in the Environment and Climate Strategy will require a swift response. The Council has adopted an Interim Sustainability Position Statement (ISPS) to clarify the Council's approach to these matters.
- 10.45. A circular economy statement, which is prepared by Elementa, on behalf of the applicant, is provided to support this application. The statement sets out that the proposed development is able to demonstrate the key six circular economy principles, including building in layers, designing out waste, designing for longevity, designing for adaptability or flexibility, designing for disassembly and using systems, elements or materials that can be reused and recycled.
- 10.46. A sustainability statement and an embodied carbon assessment report, which are prepared by Elementa, on behalf of the applicant, are provided to support this application. The sustainability measures set out in the Statement accord with the requirements of the Interim Sustainability Position Statement. As a whole, the development can achieve a 40% reduction in CO<sub>2</sub> emissions, including the introduction of new buildings which can achieve a greater reduction when comparing with the existing buildings to be demolished and the improvements to the existing buildings to be retained, based on the information provided and a formal confirmation from the applicant.
- 10.47. Whilst this would represent a considerable reduction in the potential CO<sub>2</sub> emitted from the site, the proposal does not achieve net zero. As such, it is reasonable for the Local Planning Authority to achieve the remainder by Building Emissions and Lifestyle contributions. Notwithstanding, no legal agreement has been agreed to secure the contributions as required. In an absence of the required legal agreement, it is not considered that the application does secure the necessary measures against the likely impacts on the remainder of CO<sub>2</sub> emissions from the site. Therefore, the proposed development, therefore, fails to comply with Policy SP2 and the Council's Interim Sustainability Position Statement.

**iv) Design and Character**

- 10.48. Section 12 of the NPPF is about achieving well-designed places. Paragraph 126 sets out that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

- 10.49. Policy QP3 of the BLP sets out that all development should seek to achieve a high-quality design that improves the character and quality of an area. The Policy sets out that new development should be able to respect and retain existing high-quality townscapes and landscapes and help create attractive new townscapes and landscapes.
- 10.50. While the proposed development comprises internal alterations of existing buildings, it also introduces a number of new building blocks to the site, including a new hotel accommodation block to the west of the Manor House, a new gym and back of house block and a new community building to the north of the site.

(a) Scale and Layout

*Proposed accommodation block*

- 10.51. The proposed accommodation block will be connected to the Manor House at the ground floor through a glazed link. The proposed accommodation block will be a two-storey L-shaped development and will provide 99 hotel rooms, which will create a new landscaped garden and courtyard area to the west of the Manor House. Concerns have been raised during the public consultation that the scale of the proposed accommodation block is not acceptable as it fails to be sympathetic to the existing buildings.
- 10.52. The proposed development is seeking to introduce a sizable building within the moated area, where this part of site is currently occupied by a marquee<sup>3</sup> and is therefore relatively open and free from built development. While it is understood that the scale of the proposed accommodation block has already been kept to a minimum, the proposed building will occupy a land which was originally intended to be a green space within the parkland environment and will have a substantial footprint when comparing with the adjacent Manor House. Considering the sensitive location of the proposed block, the scale and layout of the proposed accommodation block would appear at odds with the adjacent Manor House and fail to respond positively to the surrounding.

*Proposed gym and back-of-house block*

- 10.53. The proposed gym and back-of-house block, which the GIA is approximately 1,134 sqm, is proposed where there is currently a car park. The proposed block will be a single storey linear block which will provide gym, studio space and associated facilities. The back of house part will be accessible from the Manor House at the ground floor and via the servicing area. The block will have a setback from the listed garden wall, where the buffer area will be a landscaped area and access to connect Manor House and the gym block.
- 10.54. The proposed block would substantially increase the built structure of that area which is currently used for parking and the building will sit behind the existing garden wall. The height of the proposed block would also slightly be above the height of the existing wall. There would have some impacts on the views from within the eastern courtyard, but it is considered that the impacts are limited in this regard.

*Proposed marquee*

- 10.55. The marquee is proposed to have a pitched roof, white PVC outer and glazing. Glazing is restricted to the south-east, south-west and north-east elevations and it will be at the

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<sup>3</sup> Based on the Council's record, there is no planning permission for the erection of the marquee.

location of the existing scout hut building. Considering the GIA of the existing scout hut building, the GIA will substantially increase from 214 sqm to 1,139 sqm.

- 10.56. While the scout hut building is well setback from the access, the new marquee is attempting to maximise its size by relocating to the centre of the existing hardstanding area of the scout hut building. The existing access to the scout hut building will be restored to a landscaped area. The marquee will have two separate accesses for pedestrian and service vehicles, where a pedestrian access is proposed to the south-east of the marquee and a vehicular access is proposed to the south-west of the marquee, where it will connect to the existing main access of the site. Given its external appearance will be white in colour and its prominent location, the proposed marquee is considered an unacceptable addition to the site in terms of scale as it would fail to positively respond to the parkland setting.

#### *Proposed woodland parking area*

The woodland parking area is proposed to provide parking to Manor House and its associated facilities. While it is understood that there are some benefits in removing the existing parking area within the moated area, the proposed parking area however will be in a very sensitive location as it is located at the entrance area of Manor House, which currently is occupied by grassland with some hardstanding near the access. The parking area will be extended from the main access to the area next to the chapel building and to the west to the existing trees along the moat. The introduction of a parking area will permanently alter this entrance area and is clearly not in accordance with the parkland setting.

- 10.57. The proposed parking area will physically separate the chapel building and the Manor House, where the chapel building is considered to be within the curtilage of the listed Manor House. The parking will also be immediately next to the chapel building, where it is not considered adequate buffer is provided between the chapel building and the parking area. It is not considered that the layout of the parking has positively considered the setting of the chapel and the Manor House.
- 10.58. Thames Valley Police has also raised security concerns over the parking area as it will be located at the area that is publicly accessible. While the security concern about the parking area raised by Thames Valley Police is noted, it is considered that this can be addressed by the implementation of appropriate security measures, including the installation of CCTV cameras. Such details can be secured by a planning condition.

#### *Proposed community building*

- 10.59. The proposed community building will be single storey and it comprises a central activity area with associated facilities including a secure storey compound to the north of the site. The proposed development will inevitably introduce a number of buildings and structures to this undeveloped greenfield, where it is surrounded by Ancient Woodland. When considering the scale of the building, the proposed community building would fail to positively respond to the Ancient Woodland setting.

#### *(b) Landscaping*

- 10.60. The submitted design and access statement sets out that the main hotel development area will be divided into different landscape character area. In the marquee and entrance area, the proposed development is seeking to introduce a new pedestrian pathway to connect the woodland parking area to the south and the new marquee. The main access will be altered, and an attenuation basin will be created between the moat

and the altered access. The new service parking area for the new marquee will be covered by reinforced grass.

- 10.61. The proposed development includes the introduction of wildflower mix and native plantings to the entrance area. Soft landscaping will be provided to the woodland gravel parking area. The proposed development will retain the existing water feature at the centre of the entrance garden of Manor House and enhancement planting will be introduced in the entrance garden.
- 10.62. Green roofing will be introduced to the proposed gym and back-of-house block and the proposed accommodation block. The proposed development is also seeking to introduce new landscaping to the west of Manor House to create a new courtyard area.
- 10.63. The proposed landscape improvement at the entrance area would improve the existing condition of the area, where it is partially covered by hardstanding. The retention of the existing water feature is also supported as it would broadly retain the existing landscaping of the entrance garden of Manor House, where the enhancement planting will improve the landscaping of the area.
- 10.64. Notwithstanding, the proposed development is seeking to introduce a parking area to the undeveloped greenfield, and it will physically be in between Manor House and the chapel building. While soft landscaping is proposed within the parking area, it is considered that the proposed parking would still intensify the level of activities of the area. With the introduction of new plantings within the parking area to act as screening of the area, the parking area and new plantings will permanently separate the chapel building from Manor House, which is considered that the chapel is within the curtilage of the House and the urbanisation of the site would permanently alter the parkland setting of the site.
- 10.65. Considering the L-shape design of the proposed accommodation block, while it is understood that the proposed development is to introduce a new courtyard and landscaped garden to the future hotel guests, concerns have been raised by the Council's Conservation Officer that the proposed development fails to demonstrate a full understanding of the Registered Park and Garden, as the landscape design of that area is intended to be a wilderness environment. The proposed courtyard area to the west of Manor House would dilute the significance of the existing courtyard area to the east.

#### Summary

- 10.66. The proposed development is seeking to introduce a sizeable accommodation block and a gym and back of house extension block within the moated area and a new marquee and a parking area outside the moated area to the east of Manor House.
- 10.67. The proposed accommodation block, by virtue of its scale, mass, form, and design would result in an incongruous form of development. Considering both the accommodation block and the proposed gym and back of house extension block, cumulatively, they would be harmful to the character of the parkland setting where the existing site is relatively open and free from built environment.
- 10.68. The proposed marquee, by virtue of its scale, mass and external appearance would result in an incongruous form of development and fail to positively respond to the character of the parkland setting where the existing site is occupied by a Scout Hut building with a smaller footprint and is setback from the access road. The proposed parking area to the south of the proposed marquee would permanently alter the

existing undeveloped greenfield and it would fail to positively respond to the wider parkland setting.

10.69. Overall, the proposed development is contrary to Policy QP3 of the BLP.

**v) Impact on the setting of Heritage Assets**

- 10.70. Section 16 of the NPPF is about conserving and enhancing the historic environment. Paragraph 199 sets out 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. Paragraph 200 continues to set out that any harm to the significance of a designated heritage asset should require clear and convincing justification. Paragraph 202 sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use. Paragraph 203 also sets out that the effect of an application on the significance of a non-designated heritage asset should be considered in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 10.71. Policy HE1 of the BLP sets out that development proposals would be required to demonstrate how they preserve or enhance the character, appearance, and function of heritage assets (whether designated or non-designated) and their settings and respect the significance of the historic environment.
- 10.72. The application site is entirely within Ditton Park, which is a Grade II Registered Park and Garden<sup>4</sup>. The Manor House and its associated courtyard walls, stable and gatehouse blocks are Grade II listed<sup>5</sup>. The Main Gatehouse, the connecting bridge, the Garden Walls and Summerhouse are also Grade II listed<sup>6</sup>. The application site is also within the setting of a number of other Grade II listed buildings along Ditton Park Road, including the Ditton Farmhouse, its associated Barn and Granary.
- 10.73. The application is accompanied by a heritage impact assessment, which is prepared by Landgage heritage, on behalf of the applicant to support this application. The report summarises that the proposed development would result in a substantial benefit to the significance of the Grade II listed Manor House and the Registered Ditton Park. The Council's Conservation Officer has been formally consulted on this application and has raised objection to the proposed development as it would fail to preserve the significance and setting of the listed buildings and the registered park and garden.

Grade II Listed Manor House and its associated Listed buildings

- 10.74. Ditton Park has a long history, dating back to the early medieval times. The original Manor House has existed on the site since the 15th Century, and it was rebuilt in the 17th Century. The 17th Century House however was destroyed under a fire in 1812. The House was then reconstructed in the 19th Century, which forms the current Manor House. The site was in residential use when the first Manor House was built. In 1917, it was used as the Admiralty Compass Observatory for research and development. It

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<sup>4</sup> List Entry Number: 1001290

<sup>5</sup> List Entry Number: 1319354

<sup>6</sup> List Entry Number: 1117628 (Main Gatehouse and Bridge); 1319355 (Garden Walls and Summer House)

then became the headquarters of the Defence, Evaluation and Research Agency. The site had been used for research and laboratory purpose until 1979. In 1997, the site was subject to a planning permission for an education and training centre. The southwestern part of the wider site was then redeveloped to the office complex in the early 2000s.

#### *Conversion of Manor House*

- 10.75. The proposal is seeking to convert the Manor House to 33 hotel bedrooms and to introduce a restaurant to the building. The proposal also comprises the removal of the existing toilet areas on the ground floor and the first floor and other internal alterations which are subject of the associated listed building application (ref: 23/01063/LBC).
- 10.76. The internal ground floor layout of the Manor House is broadly the same as the existing one, except the existing toilet area will be converted into a dining room and a number of windows facing into the courtyard will be replaced by full-length openings to allow the direct access from the main dining area of the restaurant to the proposed private dining rooms. The existing service yard area to the northeast of the building will be removed to provide a new connection to the proposed gym building. There is no objection in principle to the conversion of the existing toilet area into a dining room and the removal of the service yard area. However, there are concerns over the detailed internal alteration works to Manor House. Whilst the internal works to the listed building would be covered under the listed building consent application, the addition of the full length windows in the building facade are subject of the full application and would result in a loss of historic building fabric.

#### *Proposed Accommodation Block*

- 10.77. The proposed accommodation block would be located to the west of Manor House within its curtilage and setting. The Council's Conservation Officer has raised concerns that the L-shaped built form would have a substantial footprint, occupying land within the wilderness area that forms part of the designated landscape area. While it is understood that the proposal is attempting to keep the scale of the accommodation block to a minimum to respect the prominence of Manor House, the proposed building would still have a significant presence in terms of its footprint, positioning, arrangement, modern appearance, and materiality. The proposed accommodation building would lack subservience when compared to Manor House. Considering the proposed accommodation block and the proposed gym and back of house block together, they would cumulatively have an increased negative impact on the historic environment. The proposed accommodation block would also be visible and impact views of the Manor House, in particular the views from the south lawn area, the approach from the west and views from the rooms along the south-western range of Manor House.

#### *Proposed Gym and Back of House Block*

- 10.78. The proposed development also includes a new gym and back of house block to the north-east of Manor House. The proposed extension has been amended to ensure there is limited impact on the existing built fabric and views of the Manor House from the east. It is noted that the proposed building will be rectangular in plan form. Considering the position of the building, it would be set away from the listed courtyard wall to allow adequate buffer between the proposed block and the courtyard wall. While it is understood that the height of the proposed building would slightly rise above the height of the courtyard wall, there is only a limited impact on the views from the courtyard. While the proposed building would form part of views of the Manor House

from the north, it is not considered that the impact to the views from Manor House would be significant.

- 10.79. The Council's Conservation Officer has set out that the erection of this building would inevitably increase the built form and have an impact on the setting of the Manor House. However, it is considered that this area had been used as a service area and therefore the impact to the significance of the listed Manor House is limited in this case.

#### Summary

- 10.80. The proposed hotel development is within the setting of the Grade II Manor House. The proposed alterations to the Manor House are not considered to be acceptable as they would lead to a permanent loss of historic fabric and fail to subdivide the rooms of the House sensitively. It would result in significant harm to the significance of the Manor House. The proposed accommodation block and gym block would constitute a cumulative impact to the Manor House, which would result in significant harm to the setting of Manor House. Overall, the harm to the significance of the setting of the Grade II Manor House is considered to be **less than substantial and at a higher end of the scale** in this regard.

#### Grade II Ditton Park

- 10.81. Ditton Park is a Grade II registered park and garden comprising a number of features of interest, including the waterbodies extending westwards, northwards, and a fishpond to the south of the Manor House, alongside many other historic built structures.

#### *Proposed Marquee and Parking Area*

- 10.82. The Berkshire Garden Trust and the Council's Conservation Officer both have raised concerns over the proposed marquee as it would reduce the sense of arrival of the site, given the prominent location and the external appearance of the proposed marquee. The marquee also would be in full view due to its excessive footprint and would be distracting from the avenue view through to the listed building and have a detrimental impact on the parkland setting.
- 10.83. The proposed development also comprises a woodland parking area to the south of Marquee. The Council's Conservation Officer has raised concerns that the parking area would alter the appearance of the existing open space directly adjacent to the chapel building. It would have a negative visual impact along the main approach to Manor House and to the setting of the curtilage of the chapel building and the parkland setting.

#### *Proposed Courtyard Area*

- 10.84. The proposed introduction of the L-shaped accommodation block to the west of Manor House also includes the creation of a formal courtyard area. While it is understood that the proposed courtyard area to the west of the Manor House would provide additional landscaping to future hotel guests, the Council's Conservation Officer has raised a concern that the introduction of a secondary courtyard area to the west of Manor House lacks understanding of the significance of the Registered Ditton Park, as the landscape design of that area was and is intended to be a wilderness environment. Furthermore, the secondary courtyard would dilute the significance of the original courtyard to the east. The proposed courtyard area would be harmful to the setting of the Grade II Ditton Park.

### Summary

- 10.85. The proposed secondary courtyard area to the west of Manor House would dilute the significance of the existing historical courtyard area to the east and materially alter the existing landscape of the area, which is a wilderness environment. The proposed courtyard area would result in significant harm to the setting of Ditton Park. The proposed marquee and parking area outside the moated area would result in significant harm to the significance of the setting of the Ditton Park. The harm is **less than substantial at a higher end of the scale** due to the sensitive location of the proposed marquee and parking area and the parking area would substantially alter the appearance of the existing open space directly adjacent to the chapel building, which is within the curtilage of the Manor House.

### Public Benefit

- 10.86. Paragraph 20<sup>7</sup> of the PPG sets out that public benefits may follow from many developments and could be anything that delivers economic, social, or environmental objectives as described in the NPPF. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long-term conservation

- 10.87. This application is accompanied by an economic headline report, which is prepared by Volterra Partners, on behalf of the applicant. The statement sets out the economic, social and heritage benefits of the proposed development.

### *Economic Benefit*

- 10.88. The applicant's headline report sets out a number of benefits of the proposed development as below:

- The creation of 305 job opportunities during the construction period.
- The creation of 130 full-time job opportunities, while retaining the existing employment onsite.
- £8.7 million visitor expenditure per annum.
- Additional tax revenues of between £1,400,000 and £1,900,000 and also business rates payments of approximately £90,000.
- The operation and hosting of events would continue to deliver benefits for the local economy

- 10.89. In terms of economic benefit, the economic benefit of the creation of 305 construction job opportunities is time limited. The proposed development will result in creating a net 120 additional permanent job opportunities. It will help support the labour market in general. The proposed development will result in a £8.7 million visitor expenditure per

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<sup>7</sup> Reference ID: 18a-020-20190723



annum, which is a considerable amount of income to the local economy. The proposed development will result in an additional tax revenues and business rates payment. Though it is a considerable amount of additional tax revenues, it is to comply with the legislation only. The existing site is already operating and hosting of events. The proposed development would also lead to a considerable loss of spaces for conferencing (i.e., from 5,123 sqm to 1,193 sqm). Overall, only **moderate** weight is afforded to this benefit.

#### *Social Benefit*

- 10.90. The applicant's headline report sets out that the proposed development would provide a new community facility to replace the existing dated scout hut building at the site. The applicant is also engaging with the local cricket club to provide cricket facilities within the site. The proposed development would also open up the site grounds to the public and improve accessibility to the Manor House. The applicant's planning statement also sets out that there is a social benefit in opening the gym and chapel building for community use.
- 10.91. In terms of social benefit, the provision of a replacement community building is mainly due to the existing location of the building will be used for a new marquee to support the proposed hotel development. It is also considered that a new community building can be provided separately. While there is a social benefit in opening the gym and chapel building for community use, how this will operate is not clear as no such details are provided in this application. Overall, only a **very limited** weight is afforded to this benefit.
- 10.92. No details have been provided in this application related to the provision of an onsite cricket facility for the local cricket club and it is not clear what and where the facilities would be provided within the site. It is also considered that such facilities can be separately provided. **No weight** is afforded to this benefit. The site including Manor House can be opened to the public without a need of a planning permission. **No weight** is afforded to this benefit.

#### *Environmental Benefit*

- 10.93. The proposed development will provide a biodiversity net gain of 205.91%, where 29.84% is from onsite provision. The provision is well above the 10% national requirement to be mandatory in November 2023. **Limited** weight shall be afforded to this benefit in this regard.

#### *Heritage Benefit*

- 10.94. Paragraph 6.1.6 of the applicant's heritage impact assessment sets out that there are a number of heritage benefits which can be identified in the proposed development as below:
- the refurbishment of Manor House would result in a low heritage benefit, as the building would be used in a manner consistent with its conservation with the involvement of minimal impacts;
  - the physical works to the north stable block would preserve the significance of the building.
  - the proposed accommodation block would preserve the setting of Manor House and would result in a small enhancement to the setting of the western elevation of Manor House;

- the proposed gym facility would not harm the significance of the parkland or the listed buildings;
  - the introduction of a new marquee and a car parking area would result in a low benefit to the significance of the parkland and the settings of the listed buildings; and
  - the proposed community building to the north of the parkland would not harm the significance of the parkland.
- 10.95. The applicant's Design and Access Statement also sets out that the applicant will be committed to a programme of heritage research and recording work and it would enhance both understanding and appreciation of the historic interest of Ditton Park and Manor House.
- 10.96. In terms of heritage benefit, it is considered that the applicant's commitment of launching a programme of heritage research and recording work is welcomed. However, it is considered that this can be carried out without the proposed development, and it is the social responsibility of the applicant to carry out this programme. The programme of heritage research and recording work can be carried out without a need of a planning permission. **No weight** is afforded to this benefit.

#### Conclusion

- 10.97. In light of the foregoing, the cumulative harm arising from the proposed development is considered to be **less than substantial at a high-end level** of the scale in this case. Paragraph 202 of the NPPF sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use. The benefits identified from the proposed development **do not** outweigh the heritage harm identified in this regard and therefore the proposed development would be contrary to Section 16 of the NPPF and Policy HE1 of the BLP.

#### Archaeology

- 10.98. The application site falls within an area of archaeological significance and archaeological remains may be damaged by ground disturbance for the proposed development. Berkshire Archaeology has been consulted and has raised no objection to the proposed development. However, a programme of archaeological work including a written scheme of investigation shall be provided to support this application. Such detail can be secured by a planning condition.

#### **vi) Impact on Neighbouring Amenity**

- 10.99. Policy QP3 of the Borough Local Plan 2013-2033 sets out that new development should have no 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.
- 10.100. Concerns have been raised during the public consultation over a lack of security plan being provided in this application and the increase in anti-social behaviour after the removal of fences and gate. Thames Valley Police has raised a concern over proposed design of the scout hut building. The proposed removal of fences and gate can be carried out without a need of a planning permission. While there is security concern over the community building, it is considered that this can be addressed by the

implementation of appropriate security measures. Such details should be provided to support the current application, but they can be secured by a planning condition.

10.101. There is a considerable separation distance from the nearest residential properties to the proposed hotel development. Therefore, it is not considered that the proposed development would have an adverse impact on the amenity of neighbouring properties. The proposed location of the new community building along the northern boundary of the site will be immediately adjacent to the established residential area. A secure storage compound is proposed at the northern boundary of the site. As the community building will be located at the centre of the site, it is not considered that the proposed community building would have an adverse impact on the amenity of neighbouring properties.

#### **vii) Trees and Woodlands**

10.102. Paragraph 180 of the NPPF sets out that development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland should be refused unless there are wholly exceptional reasons<sup>8</sup> and a suitable compensation strategy exists. Policy NR3 of the BLP also sets out that the amenity value of the trees, woodland and hedgerows outweighs the justification for development, planning permission may be refused.

##### Ancient Woodland

10.103. According to the Natural England and Forestry Commission Standard Advice related to Ancient Woodland, development, including construction and operational activities can affect ancient woodland and the wildlife they support on the site or nearby. Both direct or indirect effects of development can cause the loss or deterioration of ancient woodland. Suitable evidence should be provided to support the application including any proposed mitigation measures in development proposals to avoid and reduce harm caused by development on ancient woodlands.

10.104. An arboricultural implications report and an outline woodland management plan, which are prepared by SJA trees, on behalf of the applicant, are provided to support the application. The applicant's report sets out that the proposed development would not encroach into the woodland area but a small section of the proposed access to the community building will be within the 15 metres ancient woodland buffer. The applicant's arboricultural implications report summarises that there will be no loss or deterioration of the ancient woodland.

10.105. The applicant's outline management plan sets out that the buffer zone of the ancient woodland will be maintained where all development activities are excluded. The applicant's management plan also outlines a number of principles of woodland management to restore and enhance the ancient woodland. While the applicant's outline management plan sets out that the construction of the community building will have the impacts to the adjacent woodland. However, they can be managed to avoid any unacceptable damages to the trees including the provision of the 15 metres ancient woodland buffer.

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<sup>8</sup> For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

- 10.106. The new location of the community building is not within the designated ancient woodland. Based on the applicant's outline management plan, the site however was part of the wider original ancient woodland though the woodland was cleared and has been replanted. It then becomes a greenfield area surrounded by the replanted woodland trees and forms part of the ancient woodland. The proposed development will introduce a new building to this undeveloped greenfield site, including the increasing levels of activities within the site and to physically remove the connectivity of the two surrounding ancient woodlands.
- 10.107. While the applicant's planning statement sets out that there is an intention to keep the community building for Datchet Sea Scout onsite to continue to serve the local community, it is not considered that an alternative site has been fully explored by the applicant when considering the relocation in accordance with the mitigation hierarchy. No other evidence has also been provided to demonstrate the building has to be within this particular location. The applicant's report also fails to fully assess the direct and indirect effects of the increasing levels of activities to the adjacent ancient woodland.

### Trees

- 10.108. Policy NR3 of the BLP sets out that development proposals should protect and retain trees. Where the amenity value of the trees outweighs the justification for development, planning permission may be refused.
- 10.109. The applicant's arboricultural implications report sets out that none of the notable trees on the site are to be removed. However, 45 individual trees will have to be removed in the proposed development.
- 10.110. While the majority of the trees to be removed are assessed as category C trees, the removal includes T38 Horse Chestnut, which is a category B tree located at the proposed woodland parking area. The applicant's arboricultural implications report identifies that this is a significant component of the tree belt (G9) but the removal will be mitigated through the retention of the tree belt. A number of category C English Oak (T78 to T80) trees are also to be removed within the moated area and they are subject to TPO. The applicant's arboricultural implications report set out that they are of limited arboricultural or landscape merit due to their quality and short stature.
- 10.111. The removal of T38 tree is due to the introduction of a new parking area to the site. As discussed in the applicant's arboricultural report, this tree is a significant component of the tree belt (G9). The site is within a Registered Park and Garden, and it is important to ensure any new development within the site can retain the existing trees as they will help maintain the parking setting of the wider area, in particular to those trees which are significant. It is considered that there is a lack of strong justification for the removal as the parking area can be designed without the removal of T38 tree.
- 10.112. A number of English Oak trees can be found to the west of Manor House, and they are planted as a row along the western access to Manor House. Those English Oak trees, together with the retained T81 English Oak and G14 English Oak and Yew belt on the other side of the access, forming a distinctive character of that area.
- 10.113. While paragraph 5.2.6 of the applicant's arboricultural implications report set out that these trees are in low quality and short stature, the tree survey Schedule, however, identifies that they are in moderate quality and have a potential to form a significant feature in the future. Furthermore, based on the submitted detailed planting proposals, the proposal is seeking to introduce three Frans Fontaine to replace the English Oak trees. The introduction of the new Frans Fontaine trees will have a material change to

the existing distinctive character of the area, where it is formed by a number of English Oak trees.

- 10.114. Considering the inconsistent information contained in the applicant's arboricultural implications report and the existing distinctive character of the area formed by a number English Oak trees, it is not considered that the removal of those TPO English Oak trees is fully justified in this regard.

#### Summary

- 10.115. The location of a proposed community building is an undeveloped greenfield site, which is surrounded by ancient woodlands. There is a lack of evidence demonstrating that the replacement building has to be within this particular location. Furthermore, the submitted information fails to fully assess the direct and indirect effect of the potential increasing level of activities on the adjacent ancient woodland. While there is a public benefit of the provision of a community building to serve the local community, it is insufficient to outweigh the damage to the ancient woodland, which is considered to be an irreplaceable habitat and there is no exceptional supporting evidence showing the building has to be at this sensitive area. The removal of a number of trees, including the removal of a category B tree for the parking area and a number of English Oak trees which are subject to TPO and define the distinct character of the area to the west of Manor House, is not fully justified in this application. Overall, the proposal is there contrary to Policy NR3 of the BLP and the NPPF.

#### **viii) Ecology and Biodiversity**

- 10.116. The application site is within 10 kilometres of several internationally, nationally and locally designated sites, including South West London Waterbodies Ramsar site and Special Protection Area (SPA), Windsor Forest and Great Park Special Area of Conservation (SAC), Burnham Beeches SAC and the Impact Risk Zone for Wraysbury No.1 Gravel Pit Site of Special Scientific Interest (SSSI), Queen Mother Reservoir Local Wildlife Sites (LWS), Upton Court Park LWS and Datchet Common and Gravel Pits LWS. Given the scale of the proposed development, it is possible that the proposed development could have the potential for significant impacts on these sites. Part of the site is also within the designated Ancient Woodland. The site is also within the red impact risk zone for great crested newts.

#### Impacts on Designated sites

- 10.117. This application is accompanied by an ecological impact assessment report, which is conducted by Tyler Grange, on behalf of the applicant. The applicant's report concludes that the proposed development would not have any material impacts on the identified statutory and three non-statutory designated sites.
- 10.118. Natural England has been formally consulted on this application and it is considered that the proposed development will not have significant adverse impacts on the statutory designated sites. The Council's Ecology Officer has also been consulted on this application and it is considered that the site itself would be managed as open space for recreational use so it would not increase the recreational pressure on the LWSs nearby.

#### Impacts on Habitats

- 10.119. The applicant's ecology report sets out that the proposed development is mainly centred on areas of hardstanding, introduced shrubs and lines of trees. Those habitats

are of negligible ecological importance. The proposed development will lead to a partial loss of some of the parkland area, but no mature or veteran trees are to be lost. As the proposed development is immediately adjacent to the woodland habitats, a construction and environment management plan (CEMP) is recommended. Though part of the existing hedgerow is to be lost, replacement planting is proposed with the form of native species, and it is expected that the loss will be fully compensated by the replacement planting.

- 10.120. The Council's Ecology Officer sets out that the proposed development will fall in close proximity to the existing woodland habitats and therefore a CEMP, as recommended by the applicant's ecological report, shall be provided to support the application. Such details can be secured by a planning condition.

#### Impacts on Protected Species

- 10.121. The applicant's ecology report sets out that the proposed development would not have any adverse effects on birds, bats, and other species provided the recommended mitigation measures are followed set out in the report.

#### *Bats*

- 10.122. The applicant's ecology report sets out that the proposed development includes the removal of bat commuting and foraging habitat. Bat droppings were found at two loft voids within the Manor House. Following emergence surveys, a roost was identified but none of these roosts are in an area to be impacted by the proposed development. The trees to be removed do not have any potential to support roosting bats.
- 10.123. The Council's Ecology Officer does not dispute the findings of the emergence surveys and agrees that the proposed development will not impact in any way on that identified bat roost and therefore a licence from Natural England is not required. However, a method statement for bats shall be provided as part of the CEMP. The Council's Ecology Officer also confirms that none of the trees to be removed will have the potential to support roosting bats are to be lost so they were not subject to further survey.
- 10.124. The Council's Ecology Officer sets out that the existing woodland habitats would be used by foraging and commuting bats and therefore any new external lighting to be installed as part of the proposed development should not adversely affect bats. Details of the external lighting shall be provided but it is considered that such details can be secured by a planning condition.

#### *Great Crested Newts*

- 10.125. The application site is within the red impact risk zone for great crested newts (GCNs). In the red impact zone, there is highly suitable habitat and a high likelihood of GCNs presence. There are 11 ponds within 500 metres of the proposed development, while 6 of them are within the site boundary and 3 are within 20 metres of the site boundary.
- 10.126. The applicant's ecological report sets out that there is no evidence of GCNs was found with any of the waterbodies and GCNs are considered likely to be absent from the application site. Nature Partnership has been formally consulted in this application and sets out that they do not dispute the findings of the applicant's ecological report and agree that GCNs are unlikely to be present in the application site and are highly unlikely to be impacted by the proposed development. However, a precautionary method

statement, as recommended by the applicant's ecological report, shall be provided to support the application. Such details can be provided as part of the CEMP.

### *Badgers*

- 10.127. The applicant's ecological report sets out that a badger sett was identified on site, but it is located further than 30 metres from the development footprint. However, it is recommended that an updated badger survey shall be carried out prior to commencement of the proposed development. If active setts are identified, a mitigation strategy shall be provided and if necessary, a relevant licence shall be obtained from Natural England. It is considered that such details can be provided as part of the CEMP.

### Biodiversity Net Gain

- 10.128. NR2 of the BLP requires all new development to demonstrate a net gain in biodiversity. It is understood that a minimum 10% mandatory biodiversity net gain required calculated using the Biodiversity Metric from November 2023 is required after the 2-year implementation period from 9 November 2021 when the Environmental Bill received Royal Assent and became the Act.
- 10.129. A biodiversity net gain metric has been provided to support this application. According to the metric, the proposed development would result in a net gain of 66.51 habitat units, which is a percentage gain of 205.91%. While the proposed development can provide a measurable net gain in biodiversity, it is understood that the majority of the net gain is from offsite provision, including the improvement and enhancement of the existing woodland habitats. The onsite net gain is approximately 29.84%, which is still above the 10% requirement to be mandatory in November 2023.

## **ix) Highways and Parking**

- 10.130. Paragraph 112 of the NPPF sets out that development proposals should give priority first to pedestrian and cycle movements and second – so far as possible – to facilitating high-quality public transport. Policy IF2 of the BLP sets out that new development should provide safe, convenient, and sustainable modes of transport.

### Vehicle Movements

- 10.131. Policy IF2 of the BLP sets out that new development shall be located to minimise the distance people travel and the number of vehicle trips generated. This application is accompanied by a transport statement which is prepared by Velocity Transport Planning Limited, on behalf of the applicant.
- 10.132. The applicant's transport statement set out that the baseline surveys were not possible to be carried out due to restricted operation of the venue and therefore the assessment was based on a site in the applicant's transport consultant's database. The proposed development will be expected to have a net increase of approximately 21 vehicle movements in the AM peak hour (0800-0900) and 12 vehicle movements in the PM peak hour (1700-1800). The applicant's statement then concludes the level of traffic likely to be generated by the proposed development would not have a material impact on the existing highway networks.
- 10.133. The Council's Highways Authority has been formally consulted in this application but has raised concerns over the findings of the baseline surveys as they are not complete. The Authority considered that the proposed development is likely to intensify in use of

those accesses and would result in highways safety concerns. It is also not clear from the details provided whether a number of facilities are open to the general public as this would result in an increase in traffic generations.

- 10.134. In this case, the applicant's transport statement sets out that the baseline surveys could not be carried out due to covid restricted operation of the venue. As discussed by the Council's Highways Authority, this is not justified as it has been a while after the covid restrictions have been lifted. However, it is understood that the applicant's transport consultant has used a site in Sheffield which has capacity of 120 during the day and 180 in the evening when carrying out the baseline survey.
- 10.135. According to paragraph 3.5.1 of the applicant's transport statement, it is noted that the existing venue in Ditton Park has a capacity of 560 for conferencing and 500 guests for wedding<sup>9</sup>. It is not clear from the applicant's transport statement whether the site in Sheffield is compatible with the application site as there is a significant difference between the maximum capacity of two venues and whether the operations of two venues are similar. It is not considered that the applicant's transport statement is acceptable as there is a lack of an appropriate baseline survey provided in this regard.
- 10.136. Paragraph 015 of the PPG<sup>10</sup> sets out that data about current traffic flows on links and at junctions within the study area should be included in the transport statement or assessment. As discussed by the Council's Highways Authority, it is considered that the applicant's transport statement does not contain any data about the current traffic flows or key junctions within the study area. While there is a significant reduction in conferencing floorspace from 5,123 sqm to 1,193 sqm, it is noted that the conferencing capacity will broadly maintain at a 500 delegates' level. Additionally, the proposed development is seeking to introduce a new hotel, a number of facilities which will be shared by both future hotel guests and local residents. The intensification in use of the proposed development will inevitably increase the traffic flows on links and the key junctions.
- 10.137. Paragraph 111 of the NPPF sets out that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Paragraph 005 of the PPG<sup>11</sup> sets out that transport assessments and statements can be used to establish whether the residual transport impacts of a proposed development are likely to be "severe", which may be a reason for refusal, in accordance with the NPPF.
- 10.138. In an absence of any existing traffic data provided in the applicant's transport statement, it is not considered that any significant impacts from the proposed development on the transport network and highway safety have been mitigated to an acceptable degree. The proposed development fails to demonstrate that there would be no unacceptable impact on highway safety and any severe cumulative impacts on the local road network. Therefore, the proposed development is contrary to Section 9 of the National Planning Policy Framework and Policy IF2 of the Borough Local Plan 2013-2033.

### Vehicle Parking

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<sup>9</sup> It includes the existing marquee which is not subject to a planning permission.

<sup>10</sup> Reference ID: 42-015-20140306

<sup>11</sup> Reference ID: 42-005-20140306



- 10.139. Policy IF2 of the BLP sets out that new developments should provide vehicle and cycle parking and that the parking standards in the 2004 Parking Strategy should be used as a starting point (prior to the adoption of the Parking SPD). Consideration will be given to the accessibility of the site and any potential impacts associated with overspill parking in the local area.
- 10.140. According to the Parking Strategy, the site falls within an area of poor accessibility. Therefore, the parking standards (area of poor accessibility) should be adopted in this case. The following table summarises the maximum parking standard set out in the 2004 Parking Strategy for the proposed uses relevant to this application.
- 10.141. It is noted that the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 introduces a new use class E to replace the revoked use classes D1 and D2.

<b>Use Class</b>	<b>Maximum Parking Standard (Areas of Poor Accessibility)</b>	<b>Number of spaces should be provided</b>
C1 (hotel)	1 space per bedrooms	132
D2 (cinemas, theatres and conference centres)	1 space per 5 fixed seats	100 <sup>12</sup>
D2 (halls, sports halls and community centres)	1 space per 30sqm	7 <sup>13</sup>
<b>Total</b>		239

- 10.142. The applicant's transport statement sets out that the proposed development will provide 198 parking spaces for the hotel and 10 separate parking spaces for the relocated community building. The provision represents 83% of the maximum parking standard (area of poor accessibility). The proposed development is seeking to provide the gym facility and the chapel building for community use. Given that there is a lack of details of how these facilities will be used by both hotel guests and members of public practically, it is not able to work out the parking spaces to be provided for these facilities.
- 10.143. In terms of potential impacts associated with overspill parking in the local area, the proposed hotel development is within the centre of the site. The proposed community building is within close proximity to the established residential area to the north, but a separate parking area will be provided to accommodate the future occupants of the community building. It is not considered that the proposed development would constitute any overspill parking in the local area.
- 10.144. The nearest bus stop is approximately 900 metres from the site. Langley railway station is approximately 1.5 miles from the site, which provides regular Elizabeth Line services between Reading and London. The application site is within reasonable walking distance to local bus stops and is not far from mainline train station.
- 10.145. It is considered that a pragmatic approach should be adopted when assessing the parking levels for this site. Given the Council's Highways Authority has raised no objection to the proposed parking arrangement, the car parking provision is considered to be acceptable in this particular case.

<sup>12</sup> This is based on the maximum number of delegates for the proposed conferencing venue.

<sup>13</sup> The proposed development is seeking to open some of the facilities for community use. However, no details are provided so this figure excludes the proposed community use.

### Electric Vehicle Charging Facilities

- 10.146. The Council's Interim Sustainability Position Statement sets out that at least 20% of parking spaces should be provided with active electric vehicle charging facilities and 80% of parking spaces should be provided with passive provision.
- 10.147. The proposed development is seeking to provide 48 nos. electric vehicle charging facilities, which equates to approximately 23% of the parking spaces in total. Passive provision shall be provided for remaining spaces. Details of the electric vehicle charging facilities should be provided and those facilities should be made available prior to the operation of the proposed hotel development and the community building. However, such details can be secured by a planning condition.

### Cycle Parking

- 10.148. The 2004 Parking Strategy does not have a specific cycle parking standard for hotel units. However, it sets out that a ratio of 1 to every 20 car parking spaces with a minimum of two stands shall be provided in general. Considering the proposed development is seeking to provide a total of 208 parking spaces in total, a minimum of 10.4 cycle parking spaces should be provided.
- 10.149. The proposed development is seeking to provide 42 cycle parking spaces in total, which is well above the requirement of the 2004 Parking Strategy. Details of the cycle parking spaces shall be provided, and those spaces shall be made available prior to the operation of the proposed hotel development and the community building. However, such details can be secured by a planning condition.

### **x) Flood Risk and Sustainable Drainage**

- 10.150. Policy NR1 of the BLP sets out that development will only be supported within designated Flood Zones 2 and 3, where an appropriate flood risk assessment has been carried out and it has been demonstrated that development is located and designed to ensure that flood risk from all sources of flooding is acceptable in planning terms. Development proposals should include an assessment of the impact of climate change using appropriate climate change allowances over the lifetime of the development so that future flood risk is considered.
- 10.151. The application site is broadly within Environment Agency Flood Zone 1. However, it is noted that the land immediately adjacent to the moat is within Flood Zones 2 and 3, which means that the site has a medium to high probability of flooding and will need a flood risk assessment. This application is accompanied by a flood risk assessment (FRA), which is prepared by Elliottwood, on behalf of the applicant. The applicant's FRA concludes that the proposed development is acceptable, and it would not increase the risk of flooding elsewhere.

### The Sequential Test

- 10.152. The NPPF sets out that the proposed hotel development is classified as a "More Vulnerable" use and the sequential test is required as it is within Flood Zone 3. Paragraph 162 of the NPPF sets out that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Policy NR1 also sets out that the sequential test is required for all development in areas at risk of flooding, except for proposed developments on sites allocated in the Borough Local Plan or in a made Neighbourhood Plan.

- 10.153. As the land immediately adjacent to the moat of Manor House is within Flood Zones 2 and 3, it triggers the requirement of a sequential test and an exception test. Section 8.2 Sequential and Exception Tests of the applicant's FRA set out that new buildings and sleeping accommodation of the proposed development have been steered towards the areas which have the lowest flood risk category (i.e., Flood Zone 1).
- 10.154. Paragraph 025 of the PPG sets out that the sequential test is to ensure a sequential, risk-based approach is followed to steer new development to areas with lowest risk of flooding, taking all sources of flood risk and climate change into account. The application site is broadly within Flood Zone 1 and none of the new buildings will be located within Flood Zones 2 and 3.
- 10.155. The proposed development is seeking to convert the existing Manor House to a hotel including the introduction of a number of new buildings to provide supporting facilities such as accommodation block and leisure facilities. It would not be practical to relocate those hotel supporting facilities to an alternative site. Importantly, the location of those new buildings and facilities have already been steered to the areas with lowest risk of flooding (i.e., Flood Zone 1) within the site.
- 10.156. In conclusion, the aim of the sequential test is to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. Technically, only the moat and its immediately surrounding areas are within Flood Zones 2 and 3, where the proposed development is not seeking to construct any new buildings in these areas. Furthermore, it would not be practical to relocate hotel supporting facilities to an alternative site and they have already been steered to the areas with lowest risk of flooding. Therefore, it is considered that the sequential test is passed in this particular case.

#### The Exception Test

- 10.157. The Exception Test requires that the proposed development can (a) provide wider sustainability benefits to the community that outweigh flood risk, and (b) it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reducing flood risk overall.
- 10.158. The Exception Test is required as the moated area of Manor House is within Flood Zone 3 and hotel use falls onto the "more vulnerable" category under the Flood Risk Vulnerability. However, as discussed above, technically only the moat and its immediately surrounding areas are within Flood Zones 2 and 3 and there is no requirement of an Exception Test for more vulnerable use in Flood Zone 1. All of the new buildings and structures are within Flood Zone 1 and sustainable urban drainage will be provided as set out in the applicant's FRA. Therefore, it is not considered that the proposed development will increase flood risk elsewhere. The proposed development is seeking to allow members of public to use the community spaces in the chapel building and also the proposed spa and gym facilities. It is considered that the provision will generate a wider benefit for the wider economy. Therefore, the exception test is considered to be acceptable in this particular case.

#### Surface Water Drainage

- 10.159. This application is accompanied by a sustainable drainage strategy, which is prepared by Elliottwood, on behalf of the applicant. The Lead Local Flood Authority (LLFA) has been consulted in this application and has raised no objection to the proposed

development. Details of a surface water drainage scheme is required but it is considered that such details can be secured by a planning condition.

**xi) Environmental Health**

- 10.160. Policy EP1 of the BLP sets out that new development will only be supported where it would not have an unacceptable effect on environmental quality both during the construction phase and when completed. Details of remedial or preventative measures and any supporting environmental assessments will be required and will be secured by planning conditions to ensure that the development will be acceptable.

Artificial Light

- 10.161. Policy EP3 of the BLP sets out that development proposals should seek to avoid generating artificial light pollution where possible and development proposals for new outdoor lighting schemes that are likely to have a detrimental impact on neighbouring residents, the rural character of an area or biodiversity, should provide effective mitigation measures. Development proposals which involve outdoor lighting must be accompanied by a lighting scheme prepared according to the latest national design guidance and relevant British Standards publications.
- 10.162. A lighting impact assessment, which is prepared by Elementa, on behalf of the applicant, is provided to this application. The assessment summaries that the impacts of the proposed development in terms of artificial lighting will be negligible. However, the assessment identifies a number of measures to further minimise the lighting impact of the proposed development.
- 10.163. The Council's Environmental Protection Officer has raised no technical objection to the submitted lighting impact assessment, subject to details of the measures to minimise the effect of artificial light shall be provided to support this application. It is considered that such details can be secured by a planning condition.

Noise

- 10.164. Policy EP4 of the BLP sets out that new development should consider the noise and quality of life impact on occupants of existing nearby properties and the intended new occupiers. Development proposals will need to demonstrate that they will meet the internal noise standards for noise-sensitive developments as set out in the Policy.
- 10.165. Concerns have been raised during the public consultation over the noise pollution from the proposed wedding venue. A planning noise impact assessment, which is prepared by Spectrum., on behalf of the applicant, is provided to support this application. The assessment summarises that limits have been set for sound from mechanical plants and from music and events at the nearest noise sensitive receptors. Where these limits are met, the potential for noise impact from the proposed development is low.
- 10.166. Details of a scheme of mitigation are required for mechanical plants, event venues and the community building at the northern boundary of the site. The Council Environmental Protection Officer has been consulted and has raised no objection to the submitted planning noise impact assessment. Details of a scheme of mitigation are required for mechanical plants, event venues and the community building at the northern boundary of the site are required but it is considered that such details can be secured by a planning condition.

Contaminated Land

- 10.167. Policy EP5 of the BLP sets out that development proposals will be supported where they can demonstrate that adequate and effective remedial measures to remove the potential harm to human health and the environment are successfully mitigated.
- 10.168. A Phase I & II Geo-Environmental Assessment, which is prepared by EPS, on behalf of the application, to support this application. The report summarises that there is no significant elevations of contamination identified at the site and no further investigation, remediation or risk assessment is required.

The Council's Environmental Protection Officer has been consulted in this application. The Council Environmental Protection Officer has also raised no objection to the findings of the report, but a planning condition is recommended in the event that unexpected contamination is found.

## **xii) Very Special Circumstances**

- 10.169. Paragraph 147 of the NPPF sets out that inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 continues to set out that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt because of inappropriateness, and any other harm resulting from the proposal, is outweighed by other considerations.

### Green Belt Harm

- 10.170. The proposed development is seeking to introduce a new accommodation block to the west of Manor House, where it is currently occupied by a marquee, which is not subject to any planning permission. The proposal also includes a new gym and back to house block., where the land is currently used for parking. Both of these areas are generally open with no permanent buildings. The proposed development would introduce a new hotel use and intensify the use of the wider site. The proposed development would have a greater spatial and visual impact on the openness of the Green Belt when compared with the current use of the site.
- 10.171. The proposed development also includes the introduction of a woodland parking area to the site, where it is currently an undeveloped greenfield. While the proposal is not seeking to introduce any permanent buildings to that area, the parking area will intensify the use of the site by vehicular movements. Given the sensitive location of the parking area, it will have a greater visual impact when compared with the current use of the site.
- 10.172. The proposed development includes the provision of a new community building where the existing location will be for the erection of a new marquee. Given the design of the new marquee and its prominent location, it will have a material visual impact and introduce a new event and entertainment use to that area, where the site is currently of occasionally used by the Datchet Sea Scouts and is mainly for storage. The new location of a community building is within an undeveloped greenfield, which is surrounded by Ancient Woodland. The proposed community building will introduce a new community use and intensify the use of the site. The proposed development would have a greater visual impact when compared with the current use of the site.

- 10.173. Undoubtedly, the proposed development would constitute substantial harm to the openness and permanence of the Green Belt in this case, in addition to the harm by inappropriateness as described above.

#### Other Harm

##### *Scale and Siting*

- 10.174. While the proposed development is seeking to introduce a new accommodation block and a gym block adjacent to Manor House, the scale and massing of those buildings are not subservient to Manor House, and they would not be acceptable in scale and massing. The marquee will be located at the existing location of the Scout hut building and there will be a substantial increase in floorspace to be provided. Overall, the scale and massing of the proposed development is not acceptable as it fails to positively consider the wider historic parkland setting of the site. **Significant** weight shall be afforded to this harm.

##### *Heritage*

- 10.175. The proposed alterations to the Manor House are not considered to be acceptable as they would lead to a permanent loss of historic fabric which would result in significant harm to the significance of the Manor House. The proposed accommodation block and gym block would introduce a substantial footprint next to Manor House, which would result in significant harm to the setting of Manor House. The proposed secondary courtyard area to the west of Manor House would dilute the significance of the existing historical courtyard area to the east and materially alter the existing landscape of the area, which is a wilderness environment would substantially alter the appearance of the existing open space directly adjacent to the chapel building, which is within the curtilage of the Manor House. **Significant** weight shall be afforded to this harm to heritage assets.

##### *Highways and Transport*

- 10.176. The applicant's transport statement does not provide any existing traffic data and there is no information provided to demonstrate that the significant impacts from the proposed development on the transport network and highway safety have been mitigated to an acceptable degree. The proposed development may constitute unacceptable impact on highway safety and any severe cumulative impacts on the local road network. **Significant** weight shall be afforded to this harm.

##### *Trees and Ancient Woodland*

- 10.177. The location of a proposed community building is within an undeveloped greenfield site, which is surrounded by ancient woodlands. There is a lack of evidence to support that the replacement building has to be within this particular location. Furthermore, the submitted information fails to fully assess the direct and indirect effect of the potential increasing levels of activities to the adjacent ancient woodland. The removal of a number of trees, including the removal of a category B tree for the parking area and a number of English Oak trees which are subject to TPO and define the distinct character of the area to the west of Manor House, is not fully justified in this application. **Significant** weight shall be afforded to this harm.

##### *Sustainability*

10.178. The proposed development can achieve a 40% reduction in CO2 emissions. Whilst this would represent a considerable reduction in the potential CO2 emitted from the site, the proposal does not achieve net zero. The remainder can be achieved by the mean of financial contributions. However, no Section 106 planning obligation has been agreed to secure such contributions. The proposed development fails to secure the necessary measures against the likely impacts on the remainder of CO2 emissions from the site. **Significant** weight shall be afforded to this harm.

### Benefits

#### *Economic benefits*

10.179. While the proposed development will create 305 construction job opportunities, these opportunities are time limited. The proposed development will result in creating an additional 120 permanent job opportunities and it is considered that this will help support the labour market in general. The proposed development will also generate a £8.7 million visitor expenditure per annum, which is a considerable amount of income to the local economy. Overall, only **moderate** weight is afforded to this benefit in this regard.

#### *Ecology and Biodiversity*

10.180. The proposed development can achieve a net gain in biodiversity of 205.91%, where 29.84% is from onsite provision. The provision is above the 10% national requirement to be mandatory in November 2023. **Limited** weight shall be afforded to this benefit in this regard.

#### *Social Benefits*

10.181. The proposed development is seeking to replace the existing community building as it is due to the location of the building has to be used for a new marquee. The provision of a new community building can also be separately provided without the proposed hotel development. While the proposed development is seeking to open the gym facility and chapel building for community use, it is not clear from an operational point of view how these facilities can be used by both future hotel guests and local residents. **Limited** weight can be afforded to this benefit.

#### *Other Benefits*

10.182. The applicant's headline report also sets out there is an ongoing discussion about providing cricket facilities for local cricket club. However, no details are provided in this application related to this provision. Therefore, **no weight** shall be afforded to this benefit.

10.183. While the applicant's planning statement sets out that the proposed development will include a range of enhancements to the public access of the parkland, it is considered that such enhancements can be carried out without planning permission. Therefore, **limited weight** is place on this.

10.184. The applicant's commitment of launching a programme of heritage research and recording work is welcomed. However, it is considered that this can be carried out without the proposed development, and it is the social responsibility of the applicant to carry out this programme of research to retain a good historic record of any heritage assets. Importantly, the programme of heritage research and recording work can be

carried out without planning permission. Therefore, **no weight** shall be afforded to this benefit.

### Conclusion

10.185. While the proposed development can demonstrate a number of benefits in terms of economic development, ecology and biodiversity and social benefits. However the potential harm to the Green Belt by reason of inappropriateness and other harm resulting from the proposal including, scale, heritage, trees and ancient woodland and sustainability, which overall are afforded substantial weight, are not outweighed in this case. Very special circumstances do not exist in this case and the proposed development is contrary to Section 13 of the National Planning Policy Framework and Policy QP5 of the Borough Local Plan 2013-2033.

### **xiii) Other Considerations**

#### *Surrey Hotel Futures Study 2015*

10.186. A Surrey Hotel Futures Study, which was conducted by Hotel Solutions for Surrey County Council in 2015, was substantially referenced in the applicant's town centre policy assessment report. as Ditton Park is within the identified market area for hotel development. The study sets out that additional provision is required to cater for the strong demand for residential conferences, leisure breaks and weddings, particularly from companies and individuals coming out of London. The study continues to set out the conversion of country house properties providing a viable future for what might otherwise be redundant assets.

10.187. The Study was conducted prior to the Pandemic. The visitor and business markets at the era of post-Pandemic have drastically changed and the sectors are still recovering from the Pandemic. Importantly, the Study also does not form part of the development plans or a supplement planning document (SPD) or local documents published by the Council. Considering the study was carried out prior to the Pandemic and it does not form part of the development plans or SPDs, the findings of the study are not considered to carry any weights when assessing this application and does not outweigh the significant harms arose from the proposed development.

#### *The Recovery of the UK Hotel Market 2021*

10.188. The Recovery of the UK Hotel Market Research, which was conducted by Colliers in 2021, was referenced in the applicant's town centre policy assessment report. The findings of the Research set out that there is a rapid recovery of the hotel market and there is a market demand in hotels providing leisure breaks.

10.189. The report only references that there is a recovery in the hotel market due to increasing market demand in general and is before the current ongoing national cost of living crisis. The identified increasing market demand may be impacted by this national crisis. The Council also cannot find any further evidence provided this specifically applies to the hotel market within the Borough. Paragraph 6.10 of the submitted report acknowledges the impacts of the Pandemic and Brexit on the hospitality sector. These impacts including the ongoing cost of living crisis are likely to have a significant impact on this identified growth identified in this Research. Importantly, the Research does not form part of the development plans, or an SPD or local documents published by the Council. Therefore, the findings of the Research are not considered to carry any weight when assessing this application and does not outweigh the significant harms arose from the proposed development.



## **11. COMMUNITY INFRASTRUCTURE LEVY (CIL)**

11.1. The proposed development is not CIL liable.

## **12. PLANNING BALANCE AND CONCLUSION**

12.1. The application site is within or partially within a number of designated areas, including Green Belt, Grade II listed Registered Park and Garden, Ancient Woodland, Environment Agency Flood Zones 2 and 3, Area Tree Preservation Order. Manor House and its ancillary buildings are all Grade II listed.

12.2. The proposed development is also considered unacceptable in terms of design and character, adverse impact on heritage assets, highways, trees, and sustainability. Importantly, the proposed development would constitute an inappropriate development in the Green Belt, and very special circumstances do not exist in this case.

12.3. A number of public benefits can be identified in the proposed development including the economic benefits of a hotel development, the environmental benefit, which provide an onsite 29.84% net gain in biodiversity and the hotel facilities will be open for community use.

12.4. To conclude, the weight attributed to the benefits identified would not either individually or cumulatively, be sufficient to outweigh the other harms that are set out in this Report. On this basis of the foregoing, it is therefore recommended that planning permission be refused.

## **13. APPENDICES TO THIS REPORT**

- Appendix A - Site location plan and site layout
- Appendix B – plan and elevation drawings

- 1 The proposed development would constitute inappropriate development which, by definition, would be harmful to the Green Belt. The proposed development would result in the intensification of the use of the site and the encroachment of substantial built form within the open and rural parking setting. The harm to the Green Belt as a result of inappropriateness with the moderate harm to openness must be afforded substantial weight. No very special circumstances exist to outweigh the harm to the Green Belt by virtue of its appropriateness and harm to openness, and the other harm identified in the subsequent reasons for refusal. The proposed development would be contrary to Section 13 of the National Planning Policy Framework and Policy QP5 of the Borough Local Plan 2013-2033.
- 2 The proposed development, by virtue of its scale, mass, form, and design would result in a prominent and incongruous form of development which would be harmful to the parkland and historic character of the area. The proposed development is contrary to Policy QP3 of the Borough Local Plan 2013-2033 and Policy DAT2 of Datchet Neighbourhood Plan 2022-2033.
- 3 The overall heritage harm arising from the proposed development is less than substantial harm at the higher end. There are a number of public benefits arising from the proposed development, but those benefits identified from the proposed development cannot fully outweigh the heritage harm identified. The proposed development would be contrary to Section 16 of the National Planning Policy Framework and Policy HE1 of the Borough Local Plan 2013-2033.
- 4 In an absence of any existing traffic data provided in the transport statement, there is a

lack of information to demonstrate that any significant impacts from the proposed development on the transport network and highway safety have been mitigated to an acceptable degree. The proposed development fails to demonstrate that there would be no unacceptable impact on highway safety and any severe cumulative impacts on the local road network. Therefore, the proposed development is contrary to Section 9 of the National Planning Policy Framework and Policy IF2 of the Borough Local Plan 2013-2033.

- 5 The proposed development fails to provide sufficient evidence to demonstrate how the direct and indirect effect of the potential increasing levels of activities to the adjacent ancient woodland is assessed. The proposed development would have a detrimental impact to the adjacent ancient woodland. The proposed removal of a number of existing trees would have a detrimental impact to the parkland setting and the removal is not fully justified. The proposed development is contrary to Section 15 of the National Planning Policy Framework and Policy NR3 of the Borough Local Plan 2013-2033.
- 6 The proposed development includes the provision of a number of new buildings to support a hotel and community development. In the absence of financial provision towards the Council's Offset Fund, the likely adverse impact of climate change has not been overcome. The application fails to meet the requirements of the Council's Interim Sustainability Position Statement about climate change by Policy SP2 of the Borough Local Plan 2013-2033.