

Land East of Knowle Lane, Cranleigh

Planning Supporting Statement (Incorporating Affordable Housing Statement and Statement of Engagement)

January 2023





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Planning Supporting Statement, incorporating Affordable Housing Statement and Statement of Engagement

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Introduction

- 1.1 This Planning Statement (incorporating the Affordable Housing Statement and SCI), prepared by Gillings Planning on behalf of Gleeson Land (Gleesons) ("the Applicant"), is submitted in support of an application for outline planning permission for up to 162 residential dwellings on Land East of Knowle Lane, Cranleigh.
- **1.2** The description of development for which planning permission is sought is as follows:

'Outline planning application (with all matters reserved except means of access) for up to 3 phases of residential development of up to 162 dwellings (including 30% affordable dwellings) including the creation of new vehicular access, pedestrian and cycle accesses, parking spaces, public open space, biodiversity enhancement, landscape planting, surface water attenuation, associated infrastructure and other associated works.'

1.3 This Statement provides a planning analysis to demonstrate that the submitted proposals are acceptable in planning terms and in accordance with relevant planning policy and guidance.

- **1.4 Table 1.1** below sets out the documents submitted in support of the planning application which should be read alongside this Planning Statement and the plans & drawings lodged for consideration and approval are listed within the covering letter (also prepared by Gillings Planning) for the planning application submission.
- 1.5 A request for a Screening Opinion was submitted to the Local Authority (Waverley Borough Council 'WBC') prior to this application being submitted
 on 7th November 2022. It is being considered by WBC under reference SC/2022/02807, where the Officer has confirmed that the proposal is not EIA development, and the adoption of a formal Screening Opinion is awaited.
- **1.6** The remainder of this statement is structured as follows:
- Section 2: Site Context, including Planning History
- Section 3: Development Proposals
- Section 4: Statement of Engagement
- Section 5: Planning Policy Context
- Section 6: Planning Analysis
- Section 7: The Planning Balance

Table 1.1: Schedule of Supporting Documentation

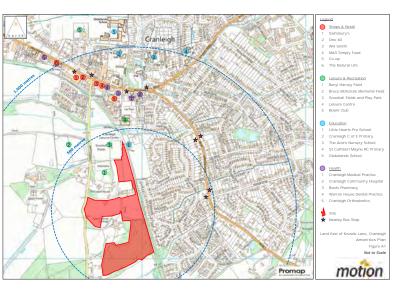
Document	Technical Consultant
Air Quality Assessment	Mayer Brown
Arboricultural Impact Assessment (December 2022)	Aspect
Biodiversity Net Gain Assessment (January 2023)	Aspect
Plans and Drawings	Richards Urban Design Ltd
Design and Access Statement (December 2022)	Richards Urban Design Ltd
Economic and Social Benefits Statement (December 2022)	Turley
Energy and Sustainability Statement (January 2023)	Daedalus
FRA and Drainage Strategy (January 2023)	Abley Letchford Partnership
Heritage Statement (Archaeology and Built Heritage) (January 2023)	RPS
Landscape and Visual Matters (January 2023)	David Williams Landscape Consultancy
Noise Assessment (January 2023)	Mayer Brown
Ecological Appraisal (January 2023)	Aspect
Transport Assessment (January 2023)	Motion
Travel Plan (January 2023)	Motion
Planning Application Form	Gillings Planning

Site Context



Site Location

- **2.1** The site is located at Cranleigh village, around 500 metres to the south of its High Street.
- 2.2 Cranleigh itself is one of the largest villages in England, within the Borough of Waverley and County of Surrey. Horsham Road and Guildford Road connect the village to their equivalently named towns, 18km northwest and 15km south-east respectively. Godalming is also located 10km east.
- 2.3 The village acts as a service centre for surrounding smaller villages, providing a range of commercial and community services including two supermarkets, other local shops, public houses, a medical practice, a community hospital, schools, restaurants and takeaways, and a leisure centre. Further amenities can be found in nearby Guildford and Horsham (both of which can be reached by bus, as set out on the amenities plan below).







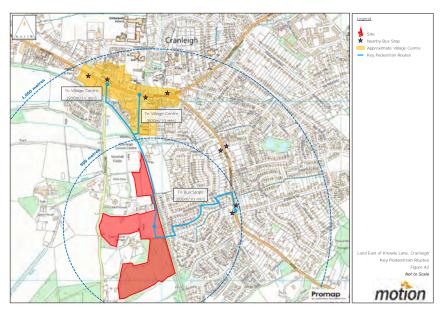
Amenities Plan

Site location

- 2.4 Immediately to the north of the site are dwellings comprising Coldharbour Farm and its former barns (now separate residential dwellings West Barn and The Brew) all of which are Grade II Listed. Access to these properties is taken from Knowle Lane. Further to the north is Snoxhall Fields and Community Centre, home to Cranleigh Football Club, and Cranleigh village centre beyond that.
- 2.5 To the east, and abutting the site boundary, is the Downs Link bridleway, previously forming the track bed for Cranleigh railway station (closed in 1965). This route, with a surface that is suitable for walkers, cyclists and horse riders, provides a connection to the village centre. There is an existing pedestrian access gate in the northern section of the site, providing access onto the Downs Link and public footpath 378.
- **2.6** On the other side of the bridleway is a large area of residential dwellings, incorporating areas including Northdowns and Longhurst Park.
- 2.7 At its central part, and on its western boundary, the site wraps around a collection of further residential dwellings including Stable Cottage and Coach House Cottage. These are accessed from a second existing point from Knowle Lane. The north-west boundary of the site is formed by Knowle Lane itself. At the south west boundary are further residential dwellings, individually accessed off Knowle Lane. To the south of the site are open fields, demarcated by hedgerows.

Site Accessibility

- **2.8** There are ample existing opportunities to travel to and from the site via sustainable forms of transport, as set out in the Transport Assessment which accompanies the planning application.
- 2.9 Public footpath 379 crosses the site, at its midpoint providing a connection to the Downs Link to the east (where that forms the eastern boundary of the site). There is also an existing pedestrian access gate in the northern section of the site, which provides access to the Downs Link at that point, and public footpath 378 which leads directly to the village centre. From here, and along this route, pedestrians can access the village centre in around 10 minutes (across an 800 metre route) and cyclists in under 5 minutes.
- 2.10 The Downs Link itself forms part of Bridleway 566 and leads north towards the village centre of Cranleigh cyclists can also use this route to access the village centre in around 3 minutes (as shown on the Pedestrian Plan). Within Cranleigh, lighting and footways provide a safe and suitable environment for pedestrians, with safety for pedestrians crossing High Street assisted by two signalised crossing points and two pedestrian refuges.
- **2.11** The Downs Link is well-used by pedestrians accessing Cranleigh village centre with a user survey conducted in January 2023 showing a total of 329 people across a 10-hour period on a Friday and 203 people across a 6 hour period on a Saturday. The user surveys indicated use of the route during commuter times as well as at the end of the school



Pedestrian Plan

day. However, continued use throughout the day on both survey dates demonstrate that the route is popular with recreational users. User surveys of footpath 378 (which runs parallel to the Downs Link) and the footpath link to Northdowns, also show good usage (as set out in the Transport Assessment lodged alongside this application).

2.12 The nearest bus stops to the site, which both benefit from a bus stop flag with timetable information, are located approximately 800 metres (a c. 10-minute walk) east of the centre of the site, on Horsham Road – as shown on the plan above. These stops are served by route 63, which runs between Horsham and Guildford (journey time of approximately 40mins to both), as well as services to St Peter's School and Godalming College. From Horsham and Guildford, rail services connect to London, Portsmouth, Woking, Gatwick Airport, Peterborough and Southampton.

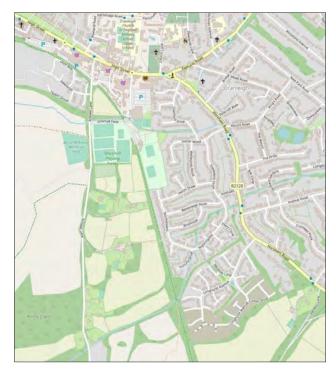
2.13 Knowle Lane runs on a north-south axis immediately to the west of the site, and forms its boundary at that point. The road is subject to a 40mph speed limit at the location of the proposed site access, and reduces to 30mph on the approach to Cranleigh village centre, to the north. To the south, Knowle Lane passes through countryside before connecting to the A281 Guildford Road approximately 5km to the south. To the north, Knowle Lane forms a priority junction with High Street, which itself forms part of the B2128, running east / west through the centre of Cranleigh village. To the east, the highway network joins with the A24, and to the west with the A281.

Site Description

- 2.14 The irregularly-shaped application site extends to 11.7ha in area and forms a greenfield site located adjacent to the built-up area of Cranleigh, nearby to Cranleigh Village Centre and to the east of Knowle Lane. The site currently accommodates a former Christmas tree farm (in its southern part) and former agricultural fields, previously used in association with Coldharbour Farm. There is currently no vehicular access point to the proposal site itself.
- 2.15 Public right of way (PROW) 379 crosses the site connecting the Downs Link (on the eastern boundary) to Knowle Lane, which is to be retained. There is also an existing pedestrian access gate located in the northern section of the site, providing a link to the Downs Link and public footpath 378. This pedestrian access point is to be retained, and a new vehicular access point proposed to Knowle Lane, as set out further below.

- **2.16** As set out more fully in the Design and Access Statement which accompanies he site is comprised of three distinct character areas:
- 1 The land to the north of West Barn is managed grassland, contained by existing hedgerows;
- 2 The central part of the site is managed grassland and forms an open area between Coldharbour Farm and West Barn / The Brew to the north, and Stable Cottage and Coach House Cottage to the south. There is a small barn building just to the south of the access road to those properties. A Public Right of Way runs across the site connecting Downs Link to the east and Knowle Lane to the west; and
- 3 The southern part of the site comprises a former planting area for a Christmas-Tree farm, that is no longer operational with mature trees defining the boundaries.
- 2.17 In terms of levels, the site has gentle contours with the northern section generally level before rising to a local ridge around the line of the PROW before falling to the south. The land also rises to the west with Knowle Lane, forming the western boundary of the site.
- 2.18 The site contains 194 individual and 23 groups of trees, largely dominated by Oak and Ash. None of these are subject of a Tree Preservation Order (TPO). Other dense vegetation exists at various points across the site, including 10 separate sections of hedgerow. The most eastern areas of the site fall within 500m of defined Ancient Woodland at Bushy Copse.

- **2.19** A variety of habitat types are located within the site, including grassland, bramble scrub, hedgerows and ponds. Species that are confirmed to currently inhabit the site include bats, reptiles and birds (including Wood Pigeon, Chaffinch, Blackbird, House Sparrow, Blue Tits and Great Tits).
- 2.20 The application site lies within Flood Zone 1, where there is the lowest chance of flooding. Areas further to the south of the site fall within Flood Zone 2 and Flood Zone 3. The site falls outside of the AONB and Green Belt.



Aerial view

2.21 There is no associated or relevant planning history across the whole site of relevance to the proposals.

Development Proposals

Overall Concept

3.1 The proposal seeks outline permission for development of the site to provide for up to 162 residential dwellings (Use Class C3), with all matters reserved, save for access. The site location plan ref: 1321.01 defines the boundaries of the application site.

3.2 Matters related to
Appearance, Landscaping,
Layout and Scale are reserved
for later determination as
defined in article 2 of the
Town and Country Planning
(Development Management
Procedure) (England) Order 2015.



- **3.3** The proposed development is controlled by:
- Parameter Plan (ref: 1321.03) confirming land use (Residential and Green Infrastructure, and corresponding areas) and building heights
- Phasing Plan (ref: 1321.04) showing a proposed three-phased development
- Access drawings
 - Proposed Access Arrangement and Visibility
 Splay (ref: 2010010-04 rev C)
 - Proposed Arrangement of Pedestrian / Cycle Route (ref: 2010010-07)
 - Access Junction Landscape Proposals Plan (ref: 0350-L10)
- 3.4 An illustrative masterplan drawing (ref: 1321.02) is also provided (albeit not for approval) to demonstrate at least one way in which 162 dwellings could be accommodated. Illustrative photomontages in the Landscape and Visual Matters Report, which accompanies the planning application, show how the proposed site access landscaping would appear in Year 1 and Year 15.





Parameters for Approval

3.5 The following elements represent the parameters of the proposed development – as detailed on the plans and drawings accompanying the application.

Land Uses

Residential

- 5ha of the site is proposed as the 'residential development area' for the provision of up to 162 no. dwellings (Use Class C3 - both market and affordable units and self-build plots).
- This area also includes road, parking, open space, drainage, landscaping and infrastructure, as well as other associated works.
- This equates to 43% of the site area in total, forming a large portion of the central and southern areas of the site.

Affordable Housing Statement

- Although not required to be specified on the Parameter Plan, as noted in the description 30% of the dwellings are to be provided as affordable, according to policy requirements.
- The unit mix and type will be determined at the reserved matters stage – albeit that the applicant anticipates and accepts that a tenure plan would be the subject of a planning condition or obligation.

Green infrastructure (GI) and Open Space

- 6.7ha of the site is proposed for Green infrastructure.
- This is to include landscape buffers, public open space (including areas of equipped and natural play space), landscape planting and Sustainable Urban Drainage systems:
 - 3.0ha of natural and semi-natural greenspace including SuDS and structural landscape planting;
 - 0.7ha of amenity greenspace, parks and gardens with informal playspace;
 - children's play area (in the form of a LEAP); and
 - 3.0ha of biodiversity improvement areas.
- Biodiversity enhancement (providing at least 10% biodiversity net gain) will be provided in the GI area as part of the proposals.
- This equates to 57% of the site area in total, complimenting the residential areas and comprising the entirety of the northern parcel of the site.
 Specifically, there is no built-form proposed on the northern triangular parcel of land (which lies within the area of greatest landscape value).



Storey heights

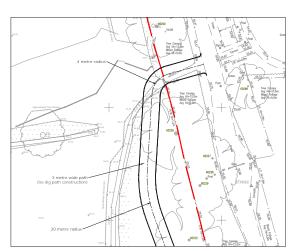
- Storey heights are limited to a maximum of 2.5 storeys, at a maximum of 11.5m from existing ground level (with a +/- 2 metre tolerance).
- Reserved matters will control design and appearance and it is intended that there will be a variety of heights, with the taller units at key focal points, accent buildings and corner elements for example.

Density

 The plan stipulates a maximum density of 32.4 dwellings per hectare (32 dph) – on the basis of providing 162 dwellings over 5 ha.

Pedestrian and Cycle Access

3.6 As shown on the parameter and access plans, the main access for pedestrians and cyclists will be at the north of the site at the location of the existing gate. From here cyclists can continue on the Downs Link towards the village centre and pedestrians are able to use this route or the route of public





footpath 378 to access the town centre. Cyclists will also be able to use the vehicular access and enter/exit the site via Knowle Lane. This pedestrian and cyclist access point forms a parameter, and comprise (alongside the main point of entry to the site for vehicles, as noted below) the 'access', which is included for consideration at this stage.

3.7 Sustainable transport methods will be provided throughout the development, which will be defined as part of the reserved matter(s) stage(s). The proposal seeks to create new internal access routes for pedestrians and cyclists. This will ensure connectivity within the site and to the surrounding area, in particular the Downs Link.

Vehicular Access

3.8 It is proposed to construct a new vehicular access onto Knowle Lane to the west of the site. The access road will be 5.5 metres in width with 6 metre kerb radii. This is shown on the access plan lodged alongside the planning application, for consideration.

3.9 The access plan (ref: 2010010-04 rev C) illustrates that visibility splays of 2.4×60 metres to the south and 2.4×69 metres to the north are achievable within the highway, in line with visibility guidance contained in Department for Transport's Manual for Streets ('MfS', March 2007).

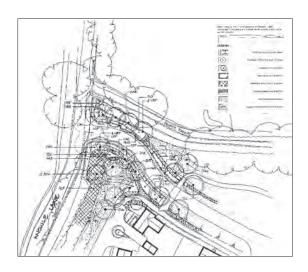
3.10 Full details of this access have been provided as part of this submission (including within the Transport Assessment) and it is designed to accommodate all traffic types for the purposes of servicing and deliveries. The access landscaping details are submitted for consideration and approval at this stage, where they form part of the access proposals. These demonstrate that the access will be designed and landscaped to respond to the context of Knowle Lane – as shown on the plan below.

Illustrative Details

3.11 The following information is entirely illustrative, in line with the illustrative masterplan. The application, in outline form, is for the provision of up to 162 no. dwellings. The illustrative masterplan submitted alongside the planning application shows one way in which the site could be developed. It is not submitted for approval, but purely for illustrative purposes only.

Landscaping, Trees and Biodiversity

- **3.12** Landscaping forms an integral part of the design for the site with the Green Infrastructure land use parameters fixed at this stage (as above), albeit that full details will be submitted at reserved matters stage.
- **3.13** Substantial areas of multifunctional open space, extensive landscaping and street tree planting complement the residential areas of the



development to enhance both amenity of residents and the surrounding environment. A variety of natural greenspace incorporating SuDS features and ecological enhancement areas are also to be provided.

- **3.14** In regards to biodiversity net gain (BNG), the applicant commits to net gain of over 10%, where the Biodiversity Net Gain Assessment submitted alongside the planning application relates.
- **3.15** At present, and based on the illustrative layout, substantially greater net gain can be secured, but this cannot be fixed until reserved matter stage. At present the illustrative masterplan finds 79.48% net gain in habitats and 15.06% net gain in hedgerows.
- 3.16 As part of the scheme, it is proposed that clearance of 16 individual trees and 2 tree groups is undertaken, as well as partial clearance of 3 groups of trees and 2 hedgerows these are unavoidable for the purposes of the development. The landscaping strategy has prioritised retention and enhancement, maintenance and incorporation of new features where possible. As a result, new trees and hedgerow will be provided to counter and enhance upon any losses however, the trees being lost are of lower grade / quality and there is only a 2% reduction in cover, before mitigation, and with additional planting there will be no net canopy loss overall.

Illustrative Landscape Plan



Housing Mix

3.17 The illustrative masterplan provides for 162 units, which is provided on the basis of the following illustrative mix.

- 38 x 1 bed flats;
- 43 x 2 bed houses:
- 54 x 3 bed houses; and
- 27 x 4 bed houses.

Drainage

3.18 Whilst full details will be provided at reserved matter stage, the Drainage Strategy currently identifies the provision of two SuDS surface water catchment features. One is towards the northern end of the site and one towards the south-eastern edge.

3.19 Two conveyance swales are provided on either side of the latter feature, with an additional swale in the northern area separate from the dwellings.

3.20 Due to the site and its topography, the southern part of the site will be pumped into the northern system. This is proposed to flow to the receiving public sewer.

3.21 The accompanying Flood Risk Assessment and Drainage Strategy provides additional information.

Planning Obligations

3.22 The following have been identified for requiring contributions as part of a Section 106:

- Affordable Housing (including a Tenure Plan);
 and
- Highways.

3.23 Discussions with the LPA regarding provision of contributions relating to the above and other relevant matters are welcomed.



Statement of Engagement

- **4.1** In accordance with national and local policy and guidance, a full programme of community and stakeholder engagement has been undertaken. Principal activities included:
- Initial discussions with Waverley Borough Council (WBC) at the pre-application stage;
- Attendance at a Cranleigh Parish Council meeting;
- A community consultation event in the form of a leaflet circulation and a dedicated project consultation website.
- Contact with Thames Water to establish available capacity in the foul sewer and discussions with the LLFA, with their recommendations informing the FRA & Drainage Strategy for the site – as set out in that document; and
- Pre-application discussions with Surrey County Council Highways, which have informed the approach to pedestrian, cyclist and vehicular access, as set out in the Transport Assessment that accompanies the planning application.

Pre-Application Discussions with WBC

- **4.2** In line with Government Guidance on best practice, initial discussions with planning officers at WBC were undertaken on the 28th September 2022.
- **4.3** At the point of submission, the written preapplication response is yet to be received. Meeting notes were however agreed with the Case Officer, and these have informed the application submission. The main points raised in the meeting related to:

Principle of development and the tilted balance

- The lack of 5YHLS was established and it was confirmed that the housing policies of the Local Plan are out of date. The tilted balance applies.
- The key issues of landscape and highway matters were confirmed.

Technical considerations

• Flood and ecological matters should be addressed in full.

- Biodiversity net gain, whilst not a policy requirement, would be considered a significant benefit.
- Highways matters regarding Knowle Lane's capacity should be justified.
- Sufficient play areas (LEAP and LAP) would be required.
- **4.4** Section 6 and the accompanying Design and Access Statement provide further detail on how the pre-application discussions have shaped the proposals.

Parish Council Meeting

- **4.5** Prior to the public consultation leaflet being distributed, the team wished to discuss the proposals with the Parish Council.
- **4.6** The team attended the meeting of 10th October 2022, the minutes of which are recorded within Cranleigh Parish Council's meeting notes. The main points raised in the meeting related to:
- Concerns regarding highways issues, traffic increase and lack of sustainable travel options;

- Concerns regarding pressure on existing drainage infrastructure:
- Comments regarding construction period conditions and vehicle movements during this time; and
- Comments regarding the push towards sustainability and integration with this motive wherever possible.

Public Consultation Engagement

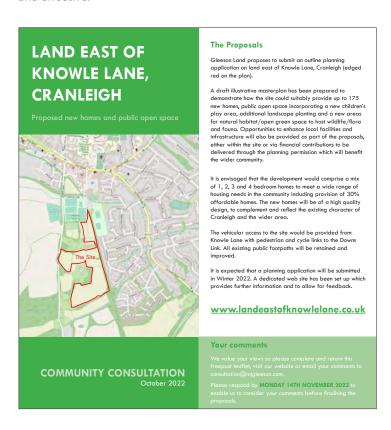
- **4.7** From an early stage, the project team were keen to engage with local residents, Ward and Parish Councillors and a leaflet distribution was agreed to be the most appropriate way to encourage community involvement with the proposal.
- **4.8** As such, circulation was arranged for the 24th October 2022. 967 letters were sent to local residents and a copy of the leaflet (with feedback forms included) can be viewed at **Appendix 1**. The leaflet was also provided to the Cranleigh Society and Cranleigh Chamber of Commerce.
- **4.9** The leaflet comprised the background to the proposals and included images of the draft illustrative masterplan. It also briefly outlined benefits and opportunities the scheme represents.
- **4.10** Feedback forms were provided as part of the leaflet and an online survey was set up, the link to which was included in the leaflet. Contact details were provided so that attendees could submit comments at a later date, by email. It was asked that all responses were lodged by 14th November 2022.

4.11 A total of 192 responses were received. Of the responses received and answered the specific question, 10 (5%) were in favour of the proposals or came with some reservations, 180 (94%) were not in favour of the proposals and 2 (1%) answered other.

4.12 Of those who responded, the main comments raised were as follows:

Comment	Response
Highways	
Access formed a key concern for many residents in regards to the link to Knowle Lane.	Numerous pre-application meetings with Surrey County Council Highways has resulted in an outcome that ensures the safety of all users of Knowle Lane. The access is not a reserved matter and is dealt with in full as part of this submission, seeking for efficient car and pedestrian movements.
Capacity issues in relation to the high street and alternative public transport methods were raised.	The Transport Assessment confirms that the proposals accord with national and local transport policies and that additional vehicles generated by the development can be catered for based upon highways modelling. This has been confirmed with Surrey County Council as part of pre-applications with them.
Infrastructure	
Concerns were raised regarding capacity of water, refuse and other services, especially given recent other housing developments in the area.	Whilst these matters are to be agreed at reserved matters stage, early consultation with the relevant authorities has been positive.
There was a concern over how the supply of surgeries, schools and so on would be managed and their current capacities.	Appropriate contributions will be made to the Council for services to be able to maintain operations following increasing resident numbers.
Landscaping	
Concerns were raised regarding removal of area of greenfield land and impact upon wildlife and character.	Whilst the existing site is, indeed, greenfield, the features are not of high value. The biodiversity net gain calculations indicate a substantial improvement with provision of high value features creating an improved space.
The potential impact of construction vehicles and other associated works was raised as a concern.	The construction process will be outlined in a CEMP, to be agreed with the Council, by condition, in order to ensure minimal disruption to the landscape and neighbours.
Other	
Suggestion that each property should have solar panels.	Whilst sustainability methods are to be confirmed at reserved matters stage, a full energy and sustainability report has been undertaken as part of this submission. Assessment of a number of methods has been undertaken and a combination of appropriate and effective methods will be implemented.
Potential for crime in the area is a concern.	Natural surveillance through the design of the layout at reserved matters stage will be key, with clear sightlines across the residential and amenity areas.
The addition of a further playground, given that existing at Snoxhall Playing Fields, has been questioned.	Whilst also a requirement of policy for a development of this size, the playground provides an opportunity for residents to have space on their doorstep to visit. Taking into account the popularity of the existing playground, further provision will only assist in providing further options to users across Cranleigh.
Comments in Support Affordable housing is needed in Cranleigh.	

4.13 In summary, the applicant has actively engaged with the local community and stakeholders to communicate and develop the proposals. This has met the requirements of the NPPF and the local guidelines, as set out in the Council's SCI. The pre-application engagement has ensured that the local community and key political stakeholders are well-informed of the proposals. Communication with interested parties remains on-going. As such, the applicant considers that the pre-application engagement undertaken with the local community and key stakeholders has been timely, meaningful, and effective.



Planning Policy Context

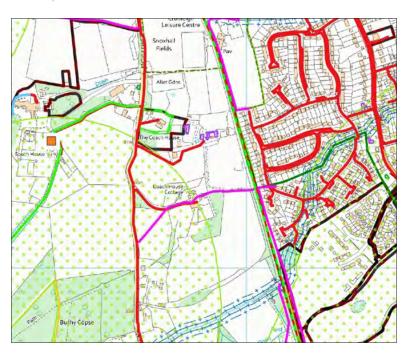
- **5.1** Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning application be made with regard to the Development Plan, unless material considerations indicate otherwise.
- 5.2 This is reiterated at paragraph 47 of the National Planning Policy Framework (NPPF), which also makes it clear that the NPPF is a material consideration in decision making. The weight attached to the following policies is discussed in Section 6 below.
- 5.3 The site is situated within the administrative area of Waverley Borough Council (WBC) where the development plan comprises the Local Plan 2002 (Saved Policies) and the Local Plan Part 1: Strategic Policies and Sites (2018).
- 5.4 The Local Plan Part 2: Site Allocations and Development Management Policies is currently emerging at examination stage. If adopted, the Local Plan 2002 will be replaced. The Examination has now closed, and Main Modifications are currently out for consultation (based on v5 published in September 2022). The LLP2 does not relate to Cranleigh specifically, as a Neighbourhood Plan

area has been declared, although the Development Management policies are relevant.

- **5.5** The site is also within the Cranleigh Parish Council area where the Cranleigh Neighbourhood Plan Area has been declared but no neighbourhood plan has been formally adopted.
- 5.6 The Regulation 16 consultation was undertaken in October 2019. That draft plan proposed allocations for 110 dwellings. However, issues were raised at Examination, and it has since become clear that two of the three proposal sites are to be retained in their current education use. On the basis that the Plan then depended on allocations that would not be brought forward, the Plan was formally withdrawn in January 2021.
- **5.7** A new Regulation 14 Plan was being prepared, but there is understood to be no progress since October 2021.
- **5.8** The main planning policy considerations pertinent to the proposed development are considered below.

Local Plan 2002 (Saved Policies) (adopted April 2002)

- **5.9** The adopted Local Plan 2002 policies map identifies the site as:
- Within the defined Countryside beyond the Green Belt:



- In the vicinity of the defined Cranleigh Town Centre Area (less than 500m); and
- Within the 500m buffer of Ancient Woodland.

5.10 The following adopted policies are considered to be of relevance to these proposals.

5.11 Policy D1 (Environmental Implications of

Development) states that environmental implications will be considered and enhancement will be promoted. Development will not be permitted if resulting in loss or damage of important environmental assets; cause harm to visual character and distinctiveness; results in loss of amenity; leads to unmanageable traffic; and leads to pollution across all areas.

5.12 Policy D4 (Design and Layout) seeks

for development to be of high quality design that integrates with the surrounding context.

Development should meet criteria relating to factors including scale, form, materials, amenity, the surrounding environment, amenity space and access.

5.13 Policy D7 (Trees, Hedgerows and Development)

ensures development will maintain individual and groups of trees for their protection and contribution to the public amenity of areas. Loss of trees will be resisted and new vegetation should be planted where appropriate.

5.14 Policy D8 (Crime Prevention) promotes

development to contribute to safe and secure environments. Consideration towards overlooking, hidden areas, footpaths and cycleway visibility and illumination should be made. **5.15 Policy D9 (Accessibility)** discusses that development should be accessible to all, including those with disabilities and young children. This should include alternatives to stepped accesses and having regard for implementation of hard and soft landscaping features.

5.16 Policy C5 (Areas of Strategic Visual Importance)

ensures the appearance of Areas of Strategic Visual Importance, highlighted by the Proposals Map, are maintained and enhanced. Development will be resisted where this aim is not supported.

5.17 Policy C6 (Landscape Enhancement) seeks improvements to landscapes through control of development and implementation of improvement schemes

5.18 Policy C7 (Trees, Woodlands and Hedgerows)

ensures trees and associated cover will be maintained, especially those which contribute to character and appearance or are of wildlife, historic or recreational significance.

5.19 Policy HE3 (Development Affecting Listed Buildings or their Setting) seeks high design standards of development that may affect a listed building to ensure its appropriateness and is compatible with the design features of the building. Otherwise, development will be resisted.

5.20 Policy M5 (Provision for Cyclists) promotes development to take opportunities to include safe and convenient cycle routes, including connecting to other cycle networks.

Local Plan Part 1: Strategic Policies and Sites (adopted February 2018)

5.21 The adopted Local Plan Part 1 policies map identifies the site as:

- Within the Countryside beyond the Green Belt; and
- Partially within an Area of Strategic Visual Importance.



5.22 The following adopted policies are considered to be relevant, with key policies highlighted.

5.23 Policy SP1 (Presumption in Favour of Sustainable Development) confirms the Council will take a positive approach reflecting the National Planning Policy Framework.

5.24 Policy SP2 (Spatial Strategy) confirms the Spatial Strategy to 2032, including avoidance of development within the AONB and Green Belt; focus development within four main settlements (including Cranleigh); and ensure new infrastructure is provided alongside new development where needed.

5.25 Policy ALH1 (The Amount and Location of Housing) outlines that the Council will make provision for at least 11,210 net additional homes to 2032, including 1,700 within the main settlement of Cranleigh.

5.26 Policy ST1 (Sustainable Transport) confirms that development schemes should be located where opportunities for sustainable transport can be maximised where appropriate and encouraged, contribute towards existing and new transport schemes. This is whilst continuing to provide suitable parking levels.

5.27 Policy AHN1 (Affordable Housing on Development Sites) confirms 30% of proposed development dwellings are to be affordable. The mix and type of dwellings should reflect evidence of housing needs and the Strategic Housing Market Assessment (SHMA).

5.28 Policy AHN3 (Housing Types and Size) seeks for development to provide appropriate ranges of different housing based upon the SHMA. New developments should meet the requirements of Building Regulations M4 (2) Category 2.

5.29 Policy LRC1 (Leisure and Recreation Facilities) outlines requirement for new developments to provide play space, covering LAPs, LEAPs, NEAPs and MUGAs.

5.30 Policy RE1 (Countryside beyond the Green Belt) identifies areas shown as Countryside, beyond the Green Belt. Their intrinsic character and beauty should be recognised and safeguarded.

5.31 Policy RE3 (Landscape Character) confirms that, subject to developments in the LPP2, Areas of Strategic Visual Importance are to be retained.

5.32 Policy HA1 (Protection of Heritage Assets) ensures that heritage assets are conserved or enhanced by safeguarding such assets and considering their setting and potential improvements.

5.33 Policy NE1 (Biodiversity and Geological Conservation) seeks for biodiversity to be conserved and enhanced. Features of interest should be retained and protected, whilst adverse impacts avoided or appropriately mitigated.

5.34 Policy NE2 (Green and Blue Infrastructure)
confirms that new development should make a
positive contribution to biodiversity by reinforcing
or creating habitat corridors or linkages to maintain

a connected ecological network. This also includes protect and enhancing water networks.

5.35 Policy CC1 (Climate Change) promotes new development to mitigate and adapt to the impacts of climate change through a variety of means. These include use of renewable and low carbon energy supply system; providing appropriate flood storage; high standards of sustainable design; and use of green infrastructure and SuDS.

5.36 Policy CC2 (Sustainable Construction and

Design) promotes developments to reduce greenhouse gas emissions through a variety of technical means, including (but not limited to) natural lighting, promotion of sustainable travel methods and limiting water per person usage.

5.37 Policy CC4 (Flood Risk Management) ensures development should be located and designed to ensure safety in relation to flood risk. SuDS is required on major development sites and run off should not increase in terms of rates or volume.

Local Plan Part 2: Site Allocations and Development Management Policies (emerging)

5.38 The following Development Management policies are considered relevant from the emerging plan. As noted above, the LPP2 does not propose Site Allocations within Cranleigh. The weight to be attached to these policies remains limited at this time.

5.39 Policy DM1 (Environmental Implications of

Development) establishes that development should seek to maintain the environment of the site and its surroundings. Harm should not be caused, through pollution or otherwise to existing assets or amenity. Biodiversity opportunities should be maximised. Where adverse impacts are unavoidable and the benefits demonstrably outweigh the harm, impacts should be mitigated.

5.40 Policy DM2 (Energy Efficiency) seeks to improve energy efficiency and reduce carbon emissions. Development should achieve this through design and technology decisions, whilst new dwellings must achieve reduction in carbon emissions of 20% against Building Regulations 2010 (Part L).

5.41 Policy DM3 (Water Supply and Wastewater Infrastructure) ensures that, should development result in required infrastructure upgrades, phasing conditions will be applied in order to deliver this as necessary.

5.42 Policy DM4 (Quality Places through Design)

establishes that new development will be expected to be of a high-quality design taking regard to the surrounding context and local distinctiveness. Principles of good design include, but are not limited to, efficient use of land; use of sustainable, attractive materials; creating clear definition between public and private realms; and adaptability for all users.

5.43 Policy DM5 (Safeguarding Amenity) stipulates development must consider future resident and existing occupant amenity, whether that be regarding overlooking, sunlight or overbearing. Adequate internal and external space must be provided.

5.44 Policy DM6 (Public Realm) states that creation of new, or changes to existing, public realm should improve links to the wider network and promote routes for accessibility to local amenities. Landscape treatment and improvements to green infrastructure should be improved as appropriate. Pedestrian and cycle movement in these spaces should be emphasised.

5.45 Policy DM7 (Safer Places) promotes development to create safe public and private spaces. This can be achieved through a variety of means, including maximising natural surveillance and providing appropriate lighting.

5.46 Policy DM9 (Accessibility and transport)

mandates that to promote sustainable transport modes and patterns, developments should provide safe and convenient access for all highways users, incorporate appropriate and effective highway designs and layout and include adequate parking space.

5.47 Policy DM11 (Trees, Woodland, Hedgerows and

Landscaping) seeks for development to retain and protect landscaping features, providing adequate separation and high quality landscaping schemes in line with the scale of development and the context of the surrounding area.

5.48 Policy DM15 (Development in rural areas)

establishes that development should not be isolated from local amenities, recognise the intrinsic beauty and character of the countryside and avoid the loss of the best agricultural land. 5.49 Policy DM20 (Development Affecting Listed Buildings, and/or their Settings) states that heritage assets should be preserved or enhanced by surrounding development. High quality design should reflect the established character and appearance of these assets – harm caused should be considered against the public benefit.

5.50 Policy DM33 (Downs Link – Guildford to Cranleigh Corridor) confirms that the route of the former railway line will be safeguarded as an important, sustainable movement corridor.

Other Material Considerations

5.51 The following documents also form material considerations of relevance to this application:

- National policy (primarily set out in the National Planning Policy Framework, Planning Practice Guidance and the National Design Guide).
- Additional guidance contained in Supplementary Planning Documents (SPD) and other guidance.

5.52 The following Supplementary Planning Documents (SPD) and guidance have been considered in developing the submitted proposals:

- Waverley Cycling Plan SPD, April 2005;
- Cranleigh Design Statement, April 2008;
- Affordable Housing SPD, April 2021; and
- Climate Change and Sustainability SPD, emerging.

National Planning Policy Framework

5.53 [The National Planning Policy Framework ("NPPF") was originally published in March 2012, revised in July 2018 and updated in February 2021, June 2019 and most recently in July 2021. It is a material consideration in planning decisions.

- **5.54** The purpose of planning is to contribute to the achievement of sustainable development and **Paragraph 8** outlines the three overarching objectives of this:
- 'An economic objective 'to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure:
- A social objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- An environmental objective to protect
 and enhance our natural, built and historic
 environment; including making effective use of
 land, improving biodiversity, using natural resources
 prudently, minimising waste and pollution, and
 mitigating and adapting to climate change,
 including moving to a low carbon economy'.

5.55 Paragraph 10 establishes that at the heart of the NPPF is a presumption in favour of sustainable development.

5.56 Paragraph 11 sets out that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking, this means:

Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.
- 5.57 Chapter 5 (Delivering a sufficient supply of homes) seeks to support the Government's objective of significantly boosting the supply of homes. This includes affordable homes. Paragraph
 65 sets a target of at least 10% of homes on development sites for affordable home ownership but advises that this does not apply on sites which are exclusively for affordable housing.
- **5.58 Annex 2** defines affordable housing as:
- a 'Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges

where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

- b Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- c Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20%

below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement'.

- **5.59 Paragraph 69** advises local planning authorities to support the development of windfall sites through policies and decisions giving great weight to the provision of housing on suitable sites within existing settlements for homes.
- **5.60** Chapter 6 (Building a strong, competitive economy) seeks to support economic growth and productivity.
- **5.61 Chapter 7 (Ensuring the vitality of town centres)** seeks to ensure that policies and decisions should support town centres and their roles in, as well as importance to, local communities.
- **5.62** Chapter 8 (Promoting healthy and safe communities) seeks to deliver healthy, inclusive and safe places which promote social interaction; are safe and accessible; and enable and support healthy lifestyles. Local authorities should guard against the unnecessary loss of local services to enhance the sustainability of communities and residential environments. An integrated approach to the location of housing, economic uses and community facilities and services should be adopted. In order to provide services to meet community need, the loss of valued facilities should be resisted.

5.63 Chapter 9 (Promoting sustainable transport)

seeks to ensure that transport matters are considered at the earliest stages of development. Opportunities towards sustainable travel methods should be promoted and priority given to pedestrian and cycle movements, followed then by access to public transport. **Paragraph 111** advises that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

- **5.64 Chapter 11 (Making effective use of land)** gives substantial weight to the value of using suitable brownfield land.
- **5.65 Chapter 12 (Achieving well-designed places)** advises that the creation of high-quality buildings and places is fundamental to the planning and development process.
- 5.66 Chapter 14 (Meeting the challenge of climate change, flooding and coastal change) seeks to secure a transition to a low carbon future ensuring that climate change adaptation, flood risk and coastal change is considered in in new development.
- **5.67 Chapter 15 (Conserving and enhancing the natural environment)** seeks to contribute to and enhance the natural and local environment, protect and enhance habitats and biodiversity and consider ground conditions and pollution.

Planning Practice Guidance (PPG)

5.68 On the 6th March 2014, the Department for Communities and Local Government ("DCLG") launched the Planning Practice Guidance webbased resource.

Affordable Housing

5.69 Paragraph 005 (Reference ID: 67-005-20190722) advises that affordable housing comprises all households whose needs are not met by the market and which are eligible for one or more of the types of affordable housing set out in Annex 2 of the NPPF.

Design

5.70 Paragraph 001 (Reference ID: 26-001-20191001) states that the adoption of a proactive and collaborative approach can help to achieve well-designed places. It refers to the National Design Guide which sets out characteristics of well-designed places which relate to context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

Healthy and Safe Communities

5.71 Paragraph 001 (Reference ID: 53-001-20190722) advises that the design of the built and natural environment is key to health and wellbeing and that environments can be created to support and encourage healthy lifestyles.

5.72 Paragraph 003 (Reference ID: 53-003-20191101) sets out that a healthy place is one that supports and promotes healthy behaviours and health equality in order to improve physical and mental health for communities. It refers to inclusive design and social interaction and the need to ensure developments are adaptable to the needs of those with sensory or mobility impairments.

Natural Environment

- **5.73** Paragraph 008 (Reference ID: 8-008-20190721) sets out that green infrastructure needs to be considered at the earliest stages of a proposal and will require suitable management and maintenance.
- **5.74** Paragraph 016 (Reference ID: 8-009-20190721) sets out that authorities need to consider the impact on protected species in their assessment of development proposals.
- **5.75** Paragraph 018 (Reference ID: 8-018-20190721) requires information of biodiversity and geodiversity to inform development proposals.
- **5.76** Paragraph 022 (Reference ID: 8-022-20190721) defines biodiversity net gain and paragraph 023 (Reference ID: 8-023-20190721) sets out how this can be achieved.

National Design Guide

5.77 The National Design Guide was published by the Ministry of Housing Communities and Local Government. It builds on the guidance set out in the NPPF and its accompanying Guidance, and outlines the Government's priorities for well-designed places in the form of ten characteristics, as follows:



Planning Analysis

- **6.1** To This section analyses the suitability of the proposed development in the context of relevant local and national planning policy. This analysis is provided to confirm that:
- The proposal complies with the Development Plan, where the presumption in favour of sustainable development applies and permission should be granted, and there are no material considerations that indicate the proposal should be determined otherwise;
- The Tilted Balance applies in any event, where the Council acknowledge they cannot demonstrate a five-year housing land supply and the relevant policies are therefore out of date and the policies that protect designated heritage assets do not provide a clear reason for refusing the development; and
- When weighed in the planning balance overall, the adverse impacts of the proposal do not significantly and demonstrably outweigh the benefits.
- **6.2** It concludes that planning permission should be granted.

6.3 Reference is made in this section to assessments set out in the technical reports that have been submitted in support of the planning application (as noted in section 1 of this Planning Statement). Those reports, and their conclusions, should be referenced in full.





Compliance with the Development Plan

- **6.4** The NPPF (as updated in July 2021) notes (at paragraph 11) that in making decisions "...a presumption in favour of sustainable development" is applied, which means (as set out in paragraph 11c) approving development that accords with an up-to-date Development Plan without delay.
- 6.5 The Development Plan in this case is the 2002 Local Plan and the Waverley Local Plan Part 1 (2018) (LPP1). There is limited weight attached to the Local Plan Part 2 (LPP2) at the point of submission. There is currently no weight attached to any Neighbourhood Plan for Cranleigh.
- **6.6** Accordingly, an assessment is made below to confirm that the proposed development accords in general terms with the Development Plan.

The proposal represents sustainable development

6.7 Policy SP1 of the LPP1 supports a presumption in favour of sustainable development, as set out in national policy. Here, the proposal can be confirmed as sustainable development, where it is in a sustainable and suitable location, as follows:

Sustainability of Location

6.8 The site represents a sustainable location for development in accordance with the requirements of policy ST1: Sustainable Transport.

6.9 As concluded in the accompanying Transport Assessment, the site is accessible by public transport, walking and cycling – with safe and suitable access provided via the Downs Link to the east of the site, and which in turn offers access into the village centre – where there are a good range of services and facilities available.

6.10 In terms of the specific requirements of policy ST1:

- The site is located so that opportunities for sustainable transport modes can be maximised

 where there are established pedestrian and cycle routes into the village centre, and bus stops (connecting to nearby train stations)
 within walking distance to the site;
- The proposals will be CIL liable, where contributions will be applied to transport schemes in the Borough (as set out in the Infrastructure Delivery Plan 2016);



- The application is accompanied by a Transport Assessment and Travel Plan;
- These confirm that the development will be (where this is confirmed at reserved matters stage) designed to provide permeability for pedestrians and cyclists as well as connections to local walking and cycling networks (where the pedestrian and cycle access point is provided as a parameter for approval).
- Cycle parking will be provided on-site in accordance with the relevant parking standards (within the gardens / garages of the houses, and in secure ground floor facilities for blocks of flats);
- The Air Quality Assessment, which accompanies the planning application, confirms how the proposal is consistent with the objectives and actions of the Air Quality Action Plan. This should be referenced in full: and
- The proposals will (to be confirmed at reserved matters stage) make appropriate provision for car parking, in accordance with the standards – as set out in the Transport Assessment which accompanies the planning application.
- **6.11** Overall, it is considered that there is a realistic prospect that residents could utilise sustainable modes of travel if they wish to do so. The measures proposed would encourage and facilitate such use and there need not be reliance entirely on private vehicles for travel. The proposals therefore comply with the terms of policy ST1.



Suitability of Location

6.12 It was provided in previous evidence (prepared by Turley) to an appeal at Alford (for housing, ref: APP/R3650/W/21/3278196, dated February 2022) that 92% of the Borough is rural and is subject to a large number of restrictive designations, including 61% of the Borough falling within the Green Belt and 77% also identified as AONB and/or Areas of Great Landscape Value ('AGLV').

designations and therefore represents one of the few options for development, and at Cranleigh itself, the application site is one of the better locations. It is particularly noteworthy that the site is set adjacent to other residential uses in Cranleigh, and in this sense is contiguous with the settlement boundary. The location is therefore suitable, where it complies with policy ST1 of the Local Plan.

The proposal aligns with the Spatial Strategy

6.14 LPP1 Policy SP2 sets out the Council's spatial strategy for the area. The broad development strategy is that in order to maintain Waverley's character whilst ensuring that development needs are met in a sustainable manner, the Plan seeks to focus the majority of development at four main settlements, with moderate and limited levels of development directed at second and third tier villages, and avoiding areas of amenity and landscape value.

6.15 Cranleigh is a 'main settlement' where development will be focussed. It is therefore 'top' of the settlement hierarchy and cannot be bettered in hierarchy terms.

6.16 It is also important to recognise that the policy does not state '**in**' the settlements, but rather '**at**'. It is therefore contended that the spatial strategy is seeking to focus development **at** Cranleigh, not solely within its boundary.

6.17 The proposal is therefore consistent with Policy SP2 on spatial strategy – in that the policy doesn't actually preclude the proposed development. It is a positively worded policy, focussing development **at** the sustainable settlements, including Cranleigh. This approach was accepted by Officers in respect of a recent application in Farnham (ref: WA/2022/01621) where the Officer stated that:

"Considering the proposal against Policy SP2, it is noted that the subtext of Paragraph 5.16 recognises that 'it will be necessary to allow some expansion of settlements through the development of suitable sites **on the edges of settlements**.' The development proposal is not in conflict with Policy SP2 given that the site is on the edge of the settlement" (emphasis added).

6.18 Similar conclusions were expressed by the Inspector in the Alford appeal (ref: 3278196) decision:

"The proposals would comply with Policies SP2 and ALH1 bearing in mind that the spatial strategy's key aim is to meet development needs whilst protecting areas of the highest importance (including Green Belt, AONB and AGLV, the Thames Basin Heaths SPA). This is precisely what this scheme does" (para 28).

6.19 The same conclusion applies here. The proposal cannot therefore be inconsistent with this policy in that development is focussed at the settlement, and avoids areas of higher restraint or protection.

6.20 In terms of delivery the follow-on text states that the policy will be delivered by the LPP2, Neighbourhood Plan and "the decisions made on planning applications and any subsequent policies and guidance that amplify the broad strategy". The policy therefore specifically allows for windfall development, such as the proposal.

6.21 Against this context, there cannot be considered to be any conflict with the Spatial Strategy, as set out in the Development Plan.



The proposal provides for identified housing numbers

6.22 Policy ALH1 makes requirements for a **minimum** number of homes – at Cranleigh this equates to 1,700. However, this **is not a cap**. This approach was recognised in the appeal decision at Alford.

6.23 The proposal is thus consistent with ALH1
in that there is no cap on numbers (although it is accepted that this does not by default allow for unlimited development). Any proposal must be judged on its merits, applying the planning balance.

6.24 As with policy SP2, the delivery section of the policy notes that the policy will be delivered through decisions on planning applications, LPP2 and Neighbourhood Plans. As above, as the LPP2 is not proposing to allocate sites at Cranleigh, and there is no Neighbourhood Plan – proposals are expected, and indeed required, to come forward as 'windfall sites'.

6.25 On this basis, the proposal provides for housing at Cranleigh against identified housing numbers and requirements, and is considered to comply with policy ALH1.

Character of countryside and landscape

6.26 Policy RE1 states "Within areas shown as Countryside beyond the Green Belt on the Adopted Policies Map, the intrinsic character and beauty of the countryside will be recognised and safeguarded in accordance with the NPPF".

6.27 In this case we argue that the intrinsic character and beauty of the countryside is indeed recognised and safeguarded.

6.28 This conclusion is drawn based on those of the LVIA, which notes "...that the majority impacts and effects would not be significant, but it would result in some localised visual effects, mainly in views from short sections of Public Footpath No. 379 through the Site (as expected) and in views from adjoining properties. The proposed development will therefore have some temporary, local landscape and visual impacts / harm but the effects of the development on character and visual appearance of the wider countryside, will not be significant".

6.29 A small part of the northern corner of the site is identified as lying within an Area of Strategic Visual Importance (ASVI) – where policy C5 of the Local Plan 2002 and policy RE3 of the LPP1 apply. However, as set out in the LVIA, this part of the site is not accessible to the public, and none of the views within this area are identified in the Local Plan and its Proposals Maps. Therefore, the majority of the site is therefore considered to form a designated 'valued' landscape as defined in the NPPF.

6.30 The conclusions of the LVIA consider the ASVI, where it is ascertained that the proposals would not have a significant adverse impact on the wider surrounding area, but would have some adverse localised visual effects – albeit that these would not be related to the very small part of the site that sits within the ASVI. In this context, there is no conflict with policy C5 or policy RE3.

6.31 Overall, and whilst it is accepted that there is some conflict with policy RE1, this can only be limited, where the visual effects are localised – and therefore the overall character and beauty of the countryside is recognised and safeguarded.

Access

6.32 The Transport Assessment that accompanies the planning application demonstrates that a safe and suitable access can be provided for private cars, emergency vehicles, pedestrians and cyclists – and that the proposal integrates with the existing highway network. In addition, appropriate provision can be made for parking and servicing in accordance with relevant standards and guidance. The proposal complies with the provisions of policy ST1, as set out further above.

Compliance with other policies

6.33 An assessment of the proposals against the relevant Development Plan policies is provided **at Appendix 2**. This confirms that the proposal accords with the Development Plan in all other respects, and there are no other material considerations that would tell otherwise.

The proposal accords with the Development Plan

6.34 On this basis, it is argued that the proposal complies with the Development Plan in that:

 The proposal represents sustainable development, and policy SP1 therefore confirms a presumption in favour;

- The site is sustainably and suitably located –
 as required by policy ST1 and where policy
 SP2 supports the principle of development
 'at' Cranleigh' (as a positive policy, rather than
 precluding development);
- Policy ALH1 is not a cap on dwelling numbers, and there is no breach as a result. The proposal makes a positive contribution towards meeting housing needs expressed in that policy, and where these will contribute to the housing supply;
- There is only limited conflict with policy RE1, as assessed within the LVIA that accompanies the planning application;
- Where the LPP2 is not proposing to allocate sites at Cranleigh, and there is no Neighbourhood Plan, proposals are expected to come forward as 'windfall sites', such as this; and
- The proposal accords with the Development Plan in all other respects, as set out in the summary table at Appendix 2.

6.35 As such, the proposals accord with the Development Plan and there are no material considerations that indicate the proposal should be determined otherwise. Owing to the presumption in favour of sustainable development being contained within Policy SP1 of the LPP1, and even though it is accepted that there is some very limited conflict with policy RE1, if the harm does not significantly and demonstrably outweigh the benefits, it follows that the Development Plan still indicates that permission should be granted.



Application of the Tilted Balance

6.36 Notwithstanding, and in accordance with paragraph 11(d) of the NPPF, the tilted balance should be applied here, as set out below – where it is argued that the policies of most relevance to determining the application (in this case policies SP2, ALH1, and RE1) are out of date and the policies protecting designated heritage assets do not provide a clear reason for refusal.

6.37 The following section sets out why the tilted balance, and therefore the presumption in favour of sustainable development, applies.

Five-Year Housing Land Supply

6.38 The Council is currently unable to demonstrate a five-year supply of housing, as confirmed by recent appeal decisions and in Position Statements published by the Council. This is accepted in preapplication advice from Officers.

6.39 Consequently, and where "the policies which are most important for determining the application are out-of-date" (as specified at footnote 8 of the NPPF) are afforded reduced weight (in this case those relating to housing, as set out below), the tilted balance applies in favour of granting planning permission for sustainable development.

Defining the Policies Most Important for Determining the Application

6.40 It is considered that the policies 'most important' in this case are defined by LPP1:

- Policy SP2 which focusses development at the four main settlements, including Cranleigh – the highest order of settlement;
- Policy ALH1 setting out minimum number of new homes for Cranleigh of 1,700 from 2013 to 2032; and
- Policy RE1 within areas shown as Countryside beyond the Green Belt the intrinsic character and beauty of the countryside will be recognised and safeguarded.



6.41 Other policies are of course relevant, but are not considered to be 'the most important'. Where a 5YHLS cannot be demonstrated, as set out above, those policies are considered to be 'out of date' and are afforded reduced weight.

Presumption in favour of sustainable development

6.42 In this scenario, the NPPF (at paragraph 11d) confirms that planning permission should be granted, unless:

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

6.43 In respect of 11(d)(i), the site does not fall under the following 'areas or assets' of particularly importance:

- Habitats site
- Sites of Special Scientific Interest;
- Green Belt.
- Local Green Space,
- Area of Outstanding Natural Beauty,
- National Park (or within the Broads Authority)
- Heritage Coast;
- Irreplaceable habitats, or
- risk of flooding or coastal change

6.44 The only remaining category is "designated heritage assets (and other heritage assets of archaeological interest)". It is therefore relevant to consider if the policies that protect designated heritage assets provide a clear reason for refusing the development in this case.

Do the policies protecting designated heritage assets provide a clear reason for refusal?

6.45 The Heritage Statement accompanying the application concludes that "...the Site forms a part of the setting of the identified built heritage assets, and that a southern part of the setting will change as a result of the proposals. The proposed development of the Site will likely result in a less than substantial harm to the identified built heritage assets' significance".

6.46 The Heritage Statement goes on to note that whilst the (illustrative) masterplan indicates that some mitigation could be provided to seek to minimise this harm to built heritage assets, it would not remove that harm entirely. The specific level of harm within this spectrum is low to the (former) Barns and negligible to Coldharbour Farmhouse.

6.47 In line with paragraph 202 of the NPPF, there is some harm, which must be weighed against the public benefits of the proposed development. Those are set out below, in providing an assessment of the planning balance. Notwithstanding, and as noted, the actual level of harm is considered to be low to negligible.



6.48 On this basis, it can be concluded that the policies that protect heritage assets, do not, on this occasion, provide a *clear reason* for refusing the development. Thus, the tilted balance is applied and when adopting the presumption in favour of sustainable development, planning permission should be granted.

The Planning Balance

6.49 The tilted balance is applied and planning permission should therefore be granted for this sustainable development.

6.50 Notwithstanding, and where there is some harm identified (albeit that this would not, in itself, provide a clear reason for refusal), it is necessary to weigh that harm against the benefits of the proposed development.

'Harm'

Lower end of less than substantial heritage harm

6.51 As noted above, the Heritage Statement accompanying the application concludes that "...the Site forms a part of the setting of the identified built heritage assets, and that a southern part of the setting will change as a result of the proposals. The proposed development of the Site will likely result in a less than substantial harm to the identified built heritage assets' significance".

6.52 The specific level of harm within this spectrum is low to the (former) Barns and negligible to Coldharbour Farmhouse.

A degree of landscape and visual harm – very 'limited' weight

6.53 As noted, the LVIA concludes "...that the majority impacts and effects would not be significant, but it would result in some localised visual effects, mainly in views from short sections of Public Footpath

No. 379 through the Site (as expected) and in views from adjoining properties. The proposed development will therefore have some temporary, local landscape and visual impacts / harm but the effects of the development on character and visual appearance of the wider countryside, will not be significant".

6.54 Indeed, and following that there is only very limited harm identified with regards to landscape, the removal of the conifer plantation can be seen as a benefit of the proposals.

6.55 As such, very limited weight can be applied to this harm.

Neutral elements

Residential amenity

6.56 As the current application is for outline consent only, a confirmed detailed layout is not available for assessment and in this respect the majority of the detailed assessment would be at reserved matters stage. However, the illustrative masterplan sets out at least one way in which the 162 dwellings could be reasonably accommodated without adverse impact on the residential amenity of surrounding residents. This demonstrates that sufficient separation distances could be achieved to prevent any adverse impact on the light, outlook or privacy of surrounding properties.

6.57 The detailed elements, and adherence with detailed policies can be secured through reserved matters and detailed conditions. The proposal is therefore acceptable in this regard.



Technical Matters

6.58 As set out in appendix 2, the proposal is assessed as having no adverse impacts in relation to the following technical matters: Flood Risk and Drainage; Traffic, Highways and Access; Air & Noise pollution; and Trees.

6.59 The proposal is acceptable in this regard and when assessed against relevant policies, as set out in appendix 2.

Benefits

Contribution, and early delivery of, market housing – substantial weight

6.60 There is an ongoing and acute need for housing in the Borough, which the Council recognise – in its confirmation that there is no five-year housing land supply for the Borough.

6.61 Given this position, there should be no dispute that the delivery of housing would represent a benefit of the proposal, and that this benefit should attract substantial weight in the planning balance.

6.62 Furthermore, it should be noted that delivery would be timely here, such that the site should be deliverable within 5 years. Indeed, the applicant's commitment to delivery was noted in a recent appeal decision where the Inspector states:

"The Council has questioned whether the site would be deliverable within the next 5 years, primarily because it is being brought forward by a site promoter. However, there is little to indicate that this would substantially delay delivery. The evidence presented to the Inquiry by the appellant indicates that the site is being taken forward by an established site promoter that has a strong track record of delivery" (para 45 – appeal ref: APP/Q3305/W/21/3285335)

6.63 Thus, there is a strong commitment to delivery in the short term, to contribute to the 5-year land supply deficit.

Contribution to self-build plots - substantial weight

- 6.64 It is understood that draft Policy DM36 in the emerging LPP2 will require 5% of dwelling plots available for sale as self / custom build, on proposals of 20 or more dwellings. A report on the self-build register dated February 2018 suggests that the need for self-build properties is to be met within three years of the base date on which the applicant is added to the register, and at the time there were 133 applicants for self-build properties.
- **6.65** Since that time, we can find no record of any planning permissions that include 'self-build' plots since that February 2018 report was published.

This would indicate that the Council is not meeting its need for self-build plots, where it has a duty to do so.

- **6.66** As part of these proposals, and as noted in the parameters for the development above, it is proposed to include 5% of the building plots as self-build equating to up to 8 self-build plots to be included in this proposal.
- **6.67** Where there is a statutory duty to provide for self-build plots to those on the register, and in turn it is noted that there is no self-build provision across the last 5 years or so, the provision of the same here can be seen as a benefit of the proposal, which should be afforded substantial weight in the planning balance.

Provision of affordable housing - substantial weight

- **6.68** It is accepted by all parties there is an acute shortfall in affordable housing in the Borough.
- **6.69** This is reflected in the publication (in April 2022) of the Council's Affordable Housing Delivery Strategy 2022 2025, which was in turn supported by evidence gathered and presented in a Housing Affordability Study (December 2021).
- **6.70** The key findings of that Housing Affordability Study note that Waverley is one of the least affordable local authorities in England with average house prices 17 times the average individual salary income of people working in the Borough and 12 times those living in the area in

2020. This, coupled with relatively low income or people working across the Borough, raised particular concerns with affordability.

- **6.71** The Study concluded that there was a clear need for affordable housing in the Borough, and particularly for rented homes. These conclusions have informed the Affordable Housing Delivery Strategy, which focuses on the need to increase the momentum in building more affordable houses. There is clearly a pressing need for affordable housing in the Borough, including at Cranleigh.
- **6.72** This proposal will provide for a 30% policy-compliant provision of affordable housing which represents provision of up to 49 affordable units at this site. This is a clear benefit of the proposal, which should be afforded substantial weight when weighed in the balance.





Open space provision - substantial weight

- **6.73** As noted within the parameters, the proposal includes for 6.7ha on the site for Green Infrastructure which will include public open space, incorporating areas of equipped and natural play space, as well as landscape planting and biodiversity improvement areas as shown on the parameter plan that accompanies the planning application.
- 6.74 The amenity greenspace (to include parks and gardens) extends to 0.7ha, with a further 0.04ha of space afforded to the equipped play provision (in the form of a LEAP, albeit that this is subject to final confirmation following discussions with officers). An additional 3ha of natural and semi-natural greenspace will be incorporated, as shown on the open space plan below.
- 6.75 These substantial areas of Green Infrastructure (extending across over half of the site area) and incorporating multifunctional open space, and extensive landscaping, complement the residential areas of the development to enhance both amenity of residents and the surrounding environment. A variety of natural greenspace incorporating SuDS features and ecological enhancement areas (as set out further below) are also to be provided.
- **6.76** Where access to these elements of public open space is available to both residents of the proposed development and the immediate locality, there is clearly a public benefit of the same. This should be afforded substantial weight in the planning balance.

Ecological enhancement and Biodiversity Net Gain – substantial weight

- **6.77** Ecological Enhancement areas will be provided for in the proposals, incorporated into the GI area as noted on the parameter plan.
- **6.78** Biodiversity improvement areas (of at least 10% biodiversity net gain) will be provided in the GI area as part of the proposals extending to a total of 3 ha, which represents around 25% of the total land area across the site.
- 6.79 At present, and as set out in the Biodiversity Net Gain Assessment lodged alongside the planning application (in turn based on the illustrative layout), substantially greater net gain (than 10% as required by policy) can be secured, but this cannot be fixed until RM stage. At present the illustrative masterplan finds 79.48% net gain in habitats and 15.06% net gain in hedgerows.



Illustrative Open space plan

6.80 A recent appeal decision in Bideford (ref: APP/W1145/W/22/3295530), dated October 2022, noted that the ability to deliver biodiversity net gain in excess of the minimum 10% (in that case, BNG in habitats of 31.19% and hedgerow habitats of 11.75% – notably lower than these proposals) was considered a benefit to be weighed in the balance. It is suggested this can be given substantial weight.

Support the local services through increased custom at local shops and pubs – moderate weight

6.81 Within the Alford appeal, moderate weight was attached by the Inspector to the support the local services through increased custom at local shops and pubs. The same applies here.

Off site contributions to infrastructure - moderate weight

6.82 The applicant intends to incorporate improvements to the South Downs Link, where these will better facilitate pedestrian and cyclist access to and from the site. Those improvements will be discussed with the relevant parties during consideration of the application, and the applicant is willing to accept an appropriately worded planning condition / obligation to secure these.

6.83 Where those improvements will be for the public benefit, they should be afforded moderate weight in the planning balance.

Social and Economic benefits - moderate weight

6.84 As set out in the Economic and Social Benefits Statement that accompanies the planning application, the proposal will provide quantifiable

economic impacts both during its construction phase and operational lifetime, as well as having broader social value for the local community.

6.85 During construction, these economic impacts are summarised as an investment of c. £30 million in construction, and the equivalent of 45 FTE gross direct jobs over the duration of the estimated 3-year construction period. In addition, the construction phase would generate 50 direct, indirect and induced net additional employment opportunities (of which it is anticipated 20 could be held by residents of the Borough) and c. £12.5 million GVA to the economic output of the South East economy (of which £9.7 million would be concentrated in Waverley).

6.86 There are quantifiable net additional impacts through the operational stages of the development, and once residents move in, including 170 additional economically active and employed residents that will be of benefit to local businesses located close to the site; supporting resident income of c. £5 million per year, a significant proportion of which is likely to be spent in the local area; supporting £3.2 million in local household retail expenditure and £1.8 million on leisure goods & services per year – in turn supporting and maintaining 15 retail and leisure-related jobs; generating £870,000 in one-off expenditure upon first occupation of homes; and generating £370,000 Council Tax payments for the Borough Council.

6.87 Health and well-being benefits are also derived from the proposals – including through the provision of Green Infrastructure (as discussed above), traineeship, apprenticeship or graduate opportunities; and the provision of up to 162 new

homes that represent secure accommodation built to a standard that averts cold, damp and overcrowding.

6.88 Overall, these social and economic benefits can be afforded moderate weight in the planning balance.

Sustainability benefits - moderate weight

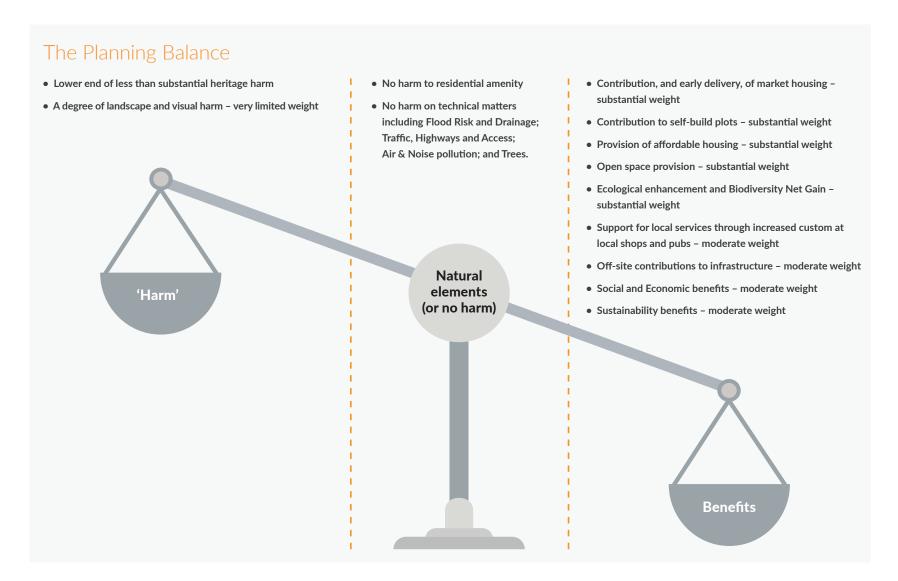
6.89 As reported in the Energy & Sustainability Statement submitted alongside the application, the proposed development will provide highly energy efficient, climate adaptable and sympathetically designed homes. It is estimated that there will be a 35-45% reduction in regulated carbon emissions against 2013 Building Regs standards, and the development will be low carbon from the outset. There is a secure and identified trajectory to net zero emissions over time.

6.90 All properties with associated parking will be provided with a dedicated EV charging point, and there is a 100% provision of secure and weatherproof cycle storage across properties.



6.91 Overall, it is suggested that there will be a reduction in household energy bills when compared against a standard development, and a 25% reduction in potable water use against the national average. All properties will have fibre-to-the-home enabled.

6.92 In conclusion, the sustainable approach set out demonstrates that the proposals align with the policies of the Development Plan, creating a low carbon development which is adapted to future changes in the climate. These sustainability benefits are afforded moderate weight in the planning balance.



Conclusions

- **7.1** In summary, it is argued that the proposal is in accordance with the Development Plan as a whole, and there are no material considerations which indicate otherwise, in that:
- The site is both sustainably and suitably located
- There is no conflict with SP2 which supports the principle of development 'at' Cranleigh
- There is no conflict with ALH1 is not a cap on dwelling numbers
- There is limited conflict with RE1
- Where the LPP2 is not proposing to allocate sites at Cranleigh, and there is no Neighbourhood Plan, proposals are expected to come forward as 'windfall sites'.
- **7.2** Further, it is accepted that the polices most important for determining the application are out of date, and the tiled balance therefore applies.

- **7.3** A full assessment of benefits and harm has been undertaken and concludes that the benefits of the scheme demonstrably and significantly outweigh the very limited harms, as noted above.
- 7.4 In summary, the proposal represents sustainable development in that they are economically, environmentally and socially sustainable and contribute towards much needed housing, in a location that it suitable, sustainable and not subject to landscape restrictions.
- **7.5** On this basis, it is respectfully suggested that planning permission be granted, subject to the appropriate s106 Agreement and conditions.



Consultation Leaflet

Appendix 1

LAND EAST OF KNOWLE LANE, CRANLEIGH

Proposed new homes and public open space



COMMUNITY CONSULTATION

October 2022

The Proposals

Gleeson Land proposes to submit an outline planning application on land east of Knowle Lane, Cranleigh (edged red on the plan).

A draft illustrative masterplan has been prepared to demonstrate how the site could suitably provide up to 175 new homes, public open space incorporating a new children's play area, additional landscape planting and a new areas for natural habitat/open green space to host wildlife/flora and fauna. Opportunities to enhance local facilities and infrastructure will also be provided as part of the proposals, either within the site or via financial contributions to be delivered through the planning permission which will benefit the wider community.

It is envisaged that the development would comprise a mix of 1, 2, 3 and 4 bedroom homes to meet a wide range of housing needs in the community including provision of 30% affordable homes. The new homes will be of a high quality design, to complement and reflect the existing character of Cranleigh and the wider area.

The vehicular access to the site would be provided from Knowle Lane with pedestrian and cycle links to the Downs Link. All existing public footpaths will be retained and improved.

It is expected that a planning application will be submitted in Winter 2022. A dedicated web site has been set up which provides further information and to allow for feedback.

www.landeastofknowlelane.co.uk

Your comments

We value your views so please complete and return this freepost leaflet, visit our website or email your comments t consultation@migleeson.com.

Please respond by MONDAY 14TH NOVEMBER 2022 to enable us to consider your comments before finalising the proposals.

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Feedback form

Please note, by providing your personal data you are consenting to our use and processing of it for our business needs. For more information on how we will process and protect your personal data, please see our Privacy Policy on our website: https://www.gleesonland.co.uk/



Assessment of proposals against relevant Development Plan policies

Appendix 2

Land East of Knowle Lane, Cranleigh - Planning Supporting Statement



Appendix 2 - Assessment of Proposals against relevant Development Plan Policies

The following table provides an assessment of the proposals against the relevant policies of the Development Plan, as contained in:

Local Plan 2002 (Saved Policies) (adopted 2002)

Local Plan Part 1: Strategic Policies and Sites (adopted 2018)

The following reports, which accompany this planning application submission, are referenced in this assessment, and should be read in full alongside the Planning Statement and this assessment of proposals against the relevant planning policies:

- Landscape and Visual Assessment (LVIA)
- Design and Access Statement (DAS)
- Transport Assessment (TA)
- Travel Plan (TP)
- Air Quality Assessment (AGA)
- Noise Impact Assessment (NIA)
- Heritage Statement (HS)
- Ecological Appraisal (PEA)
- Biodiversity Net Gain Assessment (BNGA)
- Energy & Sustainability Assessment (ESA)
- Flood Risk Assessment and Drainage Strategy (FRA)
- Arboricultural Impact Assessment (AIA)

The Reserved Matters stages are referenced below as 'RM' stages.

Relevant Planning Policy	Applicant Assessment Of Proposals
Local Plan 2002 Policy D1 - Environmental Implications of Development	The conclusions of the LVIA, DAS, TA, AQA, and NIA, which accompany the application submission, confirm that the proposals will not: result in loss or damage of important environmental assets, cause harm to visual character and distinctiveness result in loss of amenity lead to unmanageable traffic lead to pollution across all areas
Local Plan 2002 Policy D4 – Design and Layout	The details of design, and an appraisal of the same, are to be confirmed at the RM stages. However, the DAS which accompanies the application sets out one way that the site could be developed within the parameters set out – and confirms that a high-quality design would be brought forward that integrates with the surrounding context. The following elements are assessed and confirmed acceptable at the outline stage: • scale (in terms of density and storey heights), which reflects the local context
	 amenity space (where it is confirmed that 6.7ha of Green Infrastructure is included and which will incorporate open space and play-space areas); and access (where the TA confirms that safe and suitable pedestrian, cycle and vehicular access can be provided to and within the site). Details of the form and materials of the proposed units will be included for consideration at the RM stage – where the accompanying submissions will set out details of, and justification for, the proposed design approach, in response to the requirements of the relevant policy.

Relevant Planning Policy	Applicant Assessment Of Proposals	Relevant Planning Policy	Applicant Assessment Of Proposals
Local Plan 2002 Policy D7 - Trees, Hedgerows and Development Policy C7 - Trees, Woodlands and Hedgerows	The AIA that accompanies the planning application sets out the tree survey carried out and justification for the proposals on that basis. It confirms that there are no veteran, ancient or protected trees on site and no protected trees adjacent to the site that will be harmed. Furthermore, and as noted in the conclusions, whilst there is some unavoidable tree loss (albeit limited mainly to the boundary at the vehicular access point), the proposals retain all important trees, groups of trees and hedgerows that contribute to the character of the site – and planting is proposed to offset these effects. Overall, there is no net loss of canopy cover on the site, and tree cover is therefore maintained. It is concluded in the AIA that "all requisite measures have been employed to ensure arboricultural harm has been reduced as far as possible(and)subject to the implementation of appropriate mitigation measures, the proposals will not result in significant harm to the tree cover on the site, and its amenity. The nature of the development is considered acceptable from the arboricultural standpoint"	Local Plan 2002 Policy HE3 - Development Affecting Listed Buildings or their Setting LPP1 Policy HA1 - Protection of Heritage Assets	The HS that accompanies the application assess the likely impacts of the proposed development on the historic environment – which, in this case, comprises the nearby listed buildings. It is concluded that "the proposed development of the site will likely result in a less than substantial harm to the identified built heritage assets' significance". That said, the "specific level of harm within this spectrum is concluded to be low to the former Barns and negligible to Coldharbour Farmhouse". The HS also concludes that there is a low-moderate archaeological potential for the presence of Mesolithic to Bronze Age features and a low potential for all other periods. Thus, where remains of national significance are not anticipated on the site, it is envisaged that appropriately worded archaeological mitigation conditions will be sufficient, which the applicant acknowledges and is happy to commit to. The application has considered the relevant policies appropriately in an assessment of the listed buildings, their setting, and other heritage features and assets.
Local Plan 2002	As part of the proposals, it is demonstrate the tree cover will be maintained (with no net canopy loss) Overall, it has been demonstrated that the proposals meet the requirements of the relevant policies. Whilst the detailed design will be confirmed and appraised at the	Local Plan 2002 Policy M5 - Provision for Cyclists	As set out in the TA that accompanies the application, the development will promote opportunities to promote safe and convenient cycle routes within the development, and in providing connections to other cycle networks. This includes the Downs Link, via which cyclists can access Cranleigh village centre.
Policy D8 - Crime Prevention	reserved matters stages, the DAS provides an appraisal against the secured by design principles for this outline stage. This confirms how consideration has been given to providing a safe and secure environment across the proposed development – with consideration given to overlooking, hidden areas, footpaths, cycleway visibility and illumination.	LPP1 Policy AHN3 - Housing Types and Size	The parameters for this application confirm the tenure mix of the proposed development – where 30% provision for affordable housing is included, and the development will provide for up to 49 affordable units. Whilst not included in the parameters, the applicant also intends to include for 5% of the units as self-build plots, in line with emerging policy. The exact mix of housing types and sizes will be confirmed and assessed at the RM stages.
Local Plan 2002 Policy D9 - Accessibility	The approach to inclusive access is set out in the DAS – where this confirms that the layout of spaces and buildings (which will be confirmed in further detail at the RM stage) will ensure that those with additional access needs (including those with disabilities and young children) will not be segregated, being provided with access to all aspects of the place created without inconvenience or detours.		In the meantime, the illustrative masterplan submitted with the application – which shows one way that the site could be developed – provides a mix of: 38 no. 1-bed flats; 43 no. 2-bed houses; 54 no. 3-bed houses; and 27 no. 4-bed houses. As set out further in the DAS, the proposal will include for a range of
	Accordingly, the proposed development will be accessible to all, including those with disabilities and young children, in accordance with policy requirements.		different houses – based on the relevant evidence at the time this is defined, in accordance with the relevant policies. As noted in the DAS, there is a requirement for 0.41 ha of informal
Local Plan 2002 Policy C6 - Landscape Enhancement	The DAS confirms the proposed landscape strategy for the development – albeit that details of landscaping will be provided and assessed at the RM stage(s). At this stage, it is clearly set out how the landscaping proposals will enhance the site where they form an intrinsic part of the proposed development.	PP1 Policy LRC1 - Leisure and Recreation Facilities	greenspace and equipped playspace for the development. The parameters confirm that the Green Infrastructure (extending to a total of 6.7 ha) includes for 0.7 ha for this purpose. Accordingly, the development will provide for leisure and recreation facilities, in accordance with policy requirements.

Relevant Planning Policy	Applicant Assessment Of Proposals
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LPP1 Policy NE1 - Biodiversity and Geological Conservation Policy NE2 - Green and Blue Infrastructure	As noted in the PEA, there are no statutory or non-statutory nature conservation designations within or adjacent to the site, and none of the designations within the surrounding area are likely to be adversely affected by the proposals. The phase 1 habitat survey has established that the site is dominated by habitats that are not considered to be of ecological importance, and the proposals seek to retain those features identified to be of value. Finally, "Where it has not been practicable to avoid loss of habitats, new habitat creation has been proposed to offset losses, in conjunction with the landscape proposals".
	Where the habitats on site do support some protected species, mitigation measures are set out, along with enhancements "to maintain and enhance the conservation status of local populations".
	These Ecological Enhancement areas are incorporated into the GI area as noted on the parameter plan. Furthermore, Biodiversity improvement areas (of at least 10% biodiversity net gain) will be provided in the GI area as part of the proposals – extending to a total of 3 ha, which represents around 25% of the total land area across the site.
	Overall, the PEA concludes that "the proposals have sought to minimise impacts and subject to the implementation of appropriate avoidance, mitigation and compensation measures, the proposals will not result in significant harm to biodiversity. The implementation of the recommendations made will ensure that the scheme provides benefits for wildlife in the local area".
	The proposals address the policy, which seeks for biodiversity to be conserved and enhanced, and that features of interest should be retained and protected, whilst adverse impacts are avoided and appropriately mitigated. Furthermore, the proposals make a positive contribution to biodiversity, as demonstrated in the BNGA.
LPP1 Policy CC1 – Climate Change Policy CC2 – Sustainable Construction and Design	As reported in the ESA, the proposed development provides highly energy efficient, climate adaptable and sympathetically designed homes. It is estimated that there will be a 35-45% reduction in regulated carbon emissions against 2013 Building Regs standards, and the development will be low carbon from the outset. There is a secure and identified trajectory to net zero emissions over time. All properties will have associated parking have a dedicated EV charging point, and there is a 100% provision of secure and weatherproof cycle storage across properties.
	Overall, it is suggested that there will be a reduction in household energy bills when compared against a standard development, and a 25% reduction in potable water use against the national average. All properties will have fibre-to-the-home enabled.
	In conclusion, the sustainable approach set out demonstrates that the proposals align with the relevant policies, where the new developmer will mitigate and adapt to the impacts of climate change through a variety of measures, as set out. Those measures also include the provision of appropriate flood storage, high standards of sustainable design and the inclusion of green infrastructure and SuDS, as well as promoting sustainable travel methods – as set out elsewhere

promoting sustainable travel methods – as set out elsewhere.

Relevant Planning Policy	Applicant Assessment Of Proposals
LPP! Policy CC4 – Flood Risk Management	The FRA concludes that "the risk of flooding is adequately managed, and the offsite flood risk is not increased". The FRA notes that the site is located in flood zone 1, where there is low probability of river or sea flooding. The site is also at low risk of tidal, groundwater, and sewer flooding, The majority of the site is located in an area with very low risk of flooding from surface water.
	In terms of the drainage strategy, the flood risk will be managed by uncontrolled surface water runoff from the site. Increases in surface water can be managed using SuDS techniques as well as attenuation features to provide storage in extreme storm events.
	The development has been located and designed to ensure safety in relation to flood risk – with SuDS provided and run off rates not increasing in terms of rates or volume. The proposals accord with the relevant policies.

For further information contact

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