

Nathan Turner

From: Anna Gillings
Sent: 05 June 2023 13:57
To: Michael.Eastham@waverley.gov.uk
Cc: Nick Keeley; Robert Phillips; Hannah Pearce
Subject: Land at Cranleigh - final response
Attachments: A423-TN001 Drainage and Flooding Note.pdf

Dear Michael

Just further to our discussion, please find attached our final response on drainage, and a short table responding to the key points raised by the PC.

Flooding

Abley Letchford, acting on behalf of the applicant, have prepared a Flooding and Drainage Technical Note, dated 9th May in response to comments from neighbours. It does not provide any further technical information which would require reconsultation however. This confirms that detailed matters can, and should, be dealt with at detailed stage. You will of course be aware the LLFA have not objected.

Parish Council

Further, just for completeness, below is a table of our response to points raised by the Parish Council.

Topic	Comments	Applicant Response
Overdevelopment	<ul style="list-style-type: none">- <i>Inappropriate development outside of the settlement boundary and within countryside</i>- <i>Noting existing permissions yet to be completed and s106 payments yet to be receive</i>	<p>The Parish Council refer to the wider context of the existing permissions and s106 payments yet to be received. It is considered that sites should be assessed on a case-by-case basis on principle, but also take into account the wider impacts of technical matters – this has been achieved across all matters, in particular highways when considering traffic conditions. If sites are not progressing as intended, this also hinders the Borough's housing land supply situation further.</p>
Highways	<ul style="list-style-type: none">- <i>No alternative transport from the site, with no bus stops or footpath along Knowle Lane</i>- <i>Paragraph 111 of the NPPF would provide highways grounds for refusal</i>- <i>Question of algorithm to calculate transport report</i>	<p>There is no objection from County highways.</p> <p>The site is less than 800 metres from Cranleigh village centre, which is directly accessible via the Downs Link, a well used and high quality pedestrian and cycle link. Local bus services are accessible either from the village centre or from Horsham Road to the east of the site.</p> <p>On the contrary, the Transport Assessment demonstrates that the proposed development will not result in any significant adverse disruption to the free-flow of traffic on any parts of the local highway network. It is also noteworthy that the proposals include the implementation of traffic calming on Knowle Lane, which will provide safety benefits.</p> <p>The Transport Assessment has been prepared fully in accordance with industry standard practices and techniques, which have been explained throughout the document. It is noteworthy that Surrey County Council</p>

		takes no issue with the approach used or with the findings and conclusions.
Environment	<ul style="list-style-type: none"> - <i>Impact upon local character, neighbourhood landscape and wildlife habitats (including bats, owls and badgers) that should be retained</i> - <i>Negative impact upon the adjacent AONB in terms of visual amenity</i> - <i>Design guidelines have not been addressed</i> - <i>Members suggested the proposals contravene policy D1 (environmental implications of development), which discusses a variety of features including historic assets/visual character/noise and light/traffic/pollution</i> - <i>Bat report requested by members</i> 	<p>The Parish Council discuss that the proposals for the site would result in a destruction of the local character, neighbourhood landscape and wildlife habitats, that should be retained. It is considered that the character will change, however it will not be destroyed. These issues are discussed within the LVIA report submitted alongside the planning application.</p> <p>The Parish Council discuss that the proposed site is currently field with views of the neighbouring countryside. Whilst this is partially agreed, it is considered that views towards neighbouring countryside are very limited and these views will remain.</p> <p>The Parish Council suggest that if the proposed addition to the AONB is granted then this site would be on the border of an AONB. Therefore, the proposals would be a further destruction of the visual amenity in the area. This comment is factually incorrect based upon the Natural England website for the proposed extension to the Surrey Hills AONB. The proposed AONB extension is not the area near Cranleigh and fields would remain between the site and boundary of the AONB to lessen any impact.</p> <p>The Parish Council suggest the proposals would contravene saved Policy D1 of the Local Plan 2002. The landscape issues are discussed within the LVIA report and reaches different conclusions. This policy also no longer forms part of the Development Plan.</p> <p>The Parish Council refers to destruction of wildlife habitats. A suite of surveys have been undertaken and assess impact on wildlife, following standard guidance and good practice. Where there is a risk that effects may occur, we have specified appropriate mitigation to ensure there is no residual adverse effect. Important habitats will be retained and protected. The proposals include enhancements for wildlife which will deliver benefits along with the completed development.</p> <p>The Parish Council discuss bats, owls and badgers in particular. These issues have been considered in the ecology report in accordance with standard survey methods and where appropriate and relevant mitigation and enhancement measures are included within the proposals. There is no separate bat report; bats are addressed fully and appropriately within the scheme's ecological appraisal.</p> <p>The Parish Council refer to reliance on reports from 2013 – this is not the case for ecology. The oldest survey data relied upon dates from 2021 (though some desk study data provided by the records centre may be older than this).</p> <p>A detailed response has been provided in response to comments made by SWT, as referenced above.</p>
Design	<ul style="list-style-type: none"> - <i>The DAS contains reference to reports carried out in 2013</i> 	<p>The applicant would be happy to discuss further, but considers that the only reference to 2013 reports is in relation to Street Lighting for adopted highways and footpaths, private estate roads and footpaths, and car parks - where the DAS confirms that this is to comply with</p>

		BS 5489-1:2013. This is the most recent guidance on this topic.
Water	<ul style="list-style-type: none"> - <i>Flood verification report is sought</i> - <i>Reliance on pumping station to remove sewage, how will overload be managed</i> - <i>Evidence is sought relating to surface water run off</i> 	<p>The Parish Council request information relating to surface water drainage. The principles of the drainage hierarchy are presented and followed in the R001 Flood Risk Assessment and Drainage Strategy report and in drawing A423-001 Drainage Strategy. Underlying geology of the site is Weald Clay Formation, which suggests that infiltration is not a viable option of discharge. Therefore, discharge to the nearby watercourses is proposed, which is the second level within the drainage hierarchy.</p> <p>A greenfield QBar runoff rate of 5.5l/s/ha has been used, this has been taken directly from the UK SUDS website. Please refer to R001 Flood Risk Assessment and Drainage Strategy report for further information. A gravity-based solution is proposed and evidence have been supplied based on surveyed levels of the discharge points. Please refer to drawing A423-001 P6 Drainage Strategy in the R001 Flood Risk Assessment and Drainage Strategy report.</p> <p>Additional information has been provided in a response to the LLFA, as referenced above.</p>
Other	<ul style="list-style-type: none"> - <i>Members requested a CEMP to manage requests relating to badgers</i> 	<p>The Parish Council discuss CEMP/badgers – surveys have not identified the presence of active badger setts in proximity to the proposals, however we agree that a CEMP should include provision for updated survey of badgers as this species is dynamic and can colonise new areas readily. An updated badger survey should be undertaken prior to development and appropriate actions taken accordingly. This matter can be addressed as a condition of planning permission.</p>

I hope this will be of use when you come to write up the report, and please do not hesitate to give me a call if matters arise during the process.

Kind regards

Anna Gillings

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