

WA/2026/00215 – Use of land for siting of 5 additional static caravans and erection of associated dayrooms and cycle storage (part retrospective). at RANCH PARK CROCUS LANE CRANLEIGH

Applicant: Mr Dennis Torrens (and families)
Case Officer: Sam Wallis
Neighbour Notification Expiry Date: 07/03/2026
Expiry Date: 23/03/2026
RECOMMENDATION That, subject to conditions, permission be **GRANTED**

1. Site Description

The application site comprises a rectangular parcel of land situated to the north of the Lydia Park site between existing gypsy and traveller pitches on land west of Stovolds Hill. The application site area measures approximately 0.53ha, which includes the site access. The proposal is part retrospective with five gypsy / traveller pitches, services and associated access already consented under WA/2021/02392. This proposal would therefore provide a net increase of five additional static caravans.

2. Proposal

The application seeks permission for the following:

- Use of land for siting of 5 additional static caravans and erection of associated dayrooms and cycle storage (part retrospective).

3. Relevant Planning History

There are a number of permissions on the wider Lydia Park for gypsy / traveller pitches – officers have only included permissions relevant to this land parcel.

Reference	Proposal	Decision
WA/2025/02229	Use of land for siting of 10 additional static caravans and resiting existing of 5 caravans. (retrospective).	REFUSED (07/01/2026)
WA/2021/02392	Change of use of land to use as residential caravan site for 5 gypsy/traveller families each with 2 caravans together with laying of hardstanding and erection of 5 amenity buildings.	GRANTED (13/07/2022)

4. Relevant Planning Constraints

- Countryside beyond the Green Belt
- Area of Great Landscape Value (AGLV)
- Ancient Woodland 500m Buffer Zone
- BCN/2025/02 (Breach of Condition Notice)

5. Relevant Development Plan Policies and Guidance

- Waverley Borough Local Plan (Part 1): Strategic policies and sites (adopted February 2018): SP1, SP2, ST1, AHN4, RE1, RE3, TD1, NE1, CC1, CC2
- Waverley Borough Local Plan (Part 2) 2023: DM1, DM2, DM4, DM5, DM9, DM11, DM15, DM37

- Bramley Neighbourhood Plan (adopted 22 February 2022): BNP-G3, BNP-E3

Other guidance:

- The National Planning Policy Framework 2024 (NPPF)
- The National Planning Practice Guidance 2014 (NPPG)
- Council's Parking Guidelines (2013)
- Surrey Vehicular and Cycle Parking Guidance (2018)
- Climate Change and Sustainability Supplementary Planning Document (October 2022)
- Planning Policy for Traveller Sites 2024 (PPTS)
- Waverley Gypsy and Traveller Accommodation Assessment (December 2025)
- Waverley Interim 5-Year Traveller Accommodation Supply Position (2021)

6. Consultations and Parish Council Comments

Consultees	Comments
Alfold Parish Council	– No justification in the submitted planning documents which highlights further need for new accommodation and pitches. – Does not accord with the Model Standards for Caravan Sites in England, 2008. – Inadequate information relating to flooding in the area and surface water drainage. We are aware that there are problems with surface water flooding in the Stovolds Hill are which is a concern of local residents. There is also no information relating to foul waste/water drainage on the site which is also of concern and we would like this referenced in the Case Officers report. (05/03/2026)
SCC Highways Authority	No objection (subject to conditions) (04/03/2026)
Internal Consultation – Environmental Health	No objection (subject to conditions as recommended for WA/2025/02229) (09/03/2026)
SCC LLFA	Objection – Further information required. (25/02/2026)

Officers Comments

- In regard to the comments regarding minimum separation distances of caravans as set out in the Model Standards 2008 for Caravan Sites in England, each caravan is located at least 6m from one another in line with caravan site licensing requirements on fire safety.
- In terms of need, limited weight can be given to the overall level of need within the Borough. However, this does not preclude the approval of additional caravans or pitches where proposals comply with relevant policies and are acceptable on their individual merits.
- Flood risk / drainage concerns will be addressed in the report below.

7. Representations

None received.

Planning Considerations:

8. Principle of Development

Policy SP1 of the Waverley Local Plan (Part 1) 2018 (LPP1) states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development.

Policy AHN4 of Local Plan (Part 1) 2018 sets out a sequential approach for identifying sites for Travellers and Travelling Showpeople and outlines the relevant criteria against which proposals for permanent and transit sites for Gypsies and Travelling Showpeople will be assessed.

The Planning Policy for Traveller Sites ('PPTS') 2024, which should be read in conjunction with the NPPF, sets out the Government's guidance for the provision of Gypsy and Traveller sites. The PPTS is a material consideration in the determination of this planning application, to be considered in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990.

Paragraph 25 of the PPTS states that local planning authorities should consider the following issues amongst other relevant matters when considering planning applications for traveller sites:

- a) the existing level of local provision and need for sites;
- b) the availability (or lack) of alternative accommodation for the applicants;
- c) other personal circumstances of the applicant
- d) that the locally specific criteria used to guide the allocation of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites;
- e) that they should determine applications for sites from any travellers and not just those with local connections.

Paragraph 26 states that local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate, the nearest settled community and avoid placing an undue pressure on the local infrastructure.

The principle of a gypsy / traveller use of the land in question has already been established by permission WA/2021/02392. The issue in this case is whether the increased quantum of development on the land subject to this application is acceptable subject to other relevant planning considerations.

In this assessment, officers firstly set out the level of weight to be given to additional gypsy / traveller need in the section below.

9. Local Need for Gypsy and Traveller Accommodation

National planning policy relating to the provision of gypsy and traveller sites is set out in the governments *Planning policy for traveller sites* (PPTS). Paragraph 10 (a) in the PPTS also

sets out that Local Planning Authorities should “*identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets.*” Footnote 4 to Paragraph 10 in the PPTS then sets out the 3 key deliverability tests that need to be met for a site/pitch to be considered as a component of 5-year supply: “*To be considered deliverable, sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within 5 years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plan*”.

Paragraph 28 of the PPTS states “*If a local planning authority cannot demonstrate an up to date 5-year supply of deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply*”.

Paragraph 11(d) of the NPPF states that permission should be granted where there are no relevant development plan policies, or the policies in this Framework that protect areas or assets of particular importance (outlined within footnote 7 of the NPPF) provides a strong reason for refusing the development proposed, or where any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits.

In December 2025, consultants ORS completed both the Gypsy and Traveller Accommodation Assessment (GTAA) and the subsequent Pitch Deliverability Assessment (PDA) commissioned by the Council. The GTAA sought to understand the accommodation needs of the Gypsy, Traveller (and Travelling Showpeople) communities within the Council area through a combination of desk-based research, stakeholder interviews, and engagement with members of the Travelling Community. This included those living on all known sites, yards, and encampments, as well as efforts to engage households living in bricks-and-mortar accommodation. The research identified 152 Gypsy or Traveller households that meet the 2024 PPTS planning definition, with a further 40 households whose status could not be confirmed. As these 40 households may also meet the planning definition, they are treated as ‘Undetermined Households’ for the purposes of the GTAA.

Following completion of the GTAA, a detailed Pitch Deliverability Assessment (PDA) was undertaken. Its purpose was to examine in greater depth the capacity of existing sites and yards to accommodate additional pitches, plots, and/or caravans to meet the needs identified within the GTAA.

The GTAA identified a five-year requirement for 50 pitches in the borough to meet the needs of resident Gypsies and Travellers. This total - set out in the December 2025 GTAA and inclusive of need arising from Undetermined Households - comprises 37 pitches for households that meet the 2024 PPTS planning definition and 13 pitches for Undetermined Households.

The subsequent Pitch Deliverability Assessment (PDA) concluded that a total of 58 pitches could be delivered on existing sites in accordance with the three deliverability tests in Footnote 4 to Paragraph 10 of the PPTS. This supply consists of 49 pitches for households meeting the 2024 PPTS planning definition and 9 pitches for Undetermined Households. The Ranch Park site (WAV017-11) was identified in the PDA as being able to accommodate a maximum of 12 pitches (only takes account of the pitch 500sqm requirement and space will be required for relevant access).

On this basis, the Council is currently able to demonstrate a five-year supply of pitches in excess of the identified need – with a surplus 8 pitches above the identified need of 50 as

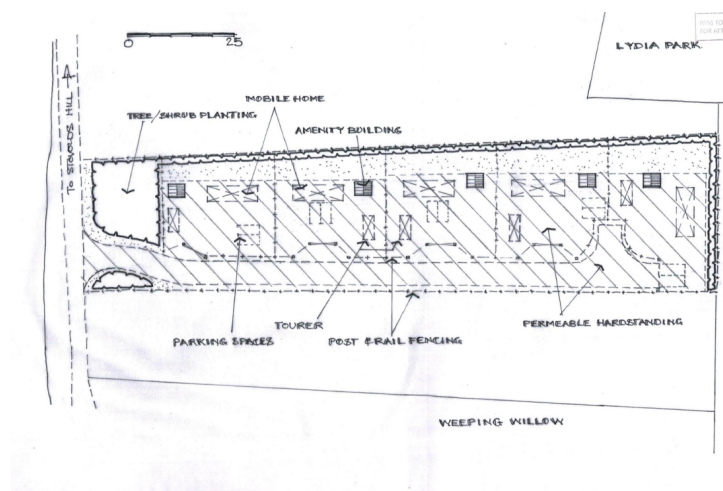
set out in the December 2025 GTAA. The intensification of this site as identified in the PDA contributes to meeting that need identified. However, this does not preclude the approval of additional pitches where proposals comply with relevant policies and are acceptable on their individual merits.

10. Planning and Enforcement History

The planning history is a material consideration.

The background of the site is that permission was granted back on 13/07/2022 for the change of use of land to use as residential caravan site for 5 gypsy/traveller families each with 2 caravans together with laying of hardstanding and erection of 5 amenity buildings (WA/2021/02392). Of a total of nine conditions attached to that permission, Condition 4 restricted the site to 'no more than 5 static caravans and 5 towing caravans' (evidently a typographic error and should be read as 5 touring caravans).

The approved plan for WA/2021/0392 is shown below:



Proposed Block Plan (WA/2021/02392) (not to scale)

Following the grant of planning permission, there has been a subsequent Breach of Condition Notice served on the site. The site subject to this application forms part of a wider Enforcement Complaint (C/2022/00044) that is reviewing ongoing planning issues across the wider Lydia Park site. The Enforcement team have been to this particular site as well as others across Lydia Park several times, reviewing unauthorised works that have taken place, ascertaining gypsy / traveller occupancy, the number of caravans on sites and welfare of occupants.

In relation to this site, most recently, the Council's Planning Enforcement Officers conducted a site visit on 09/09/2025 to further engage with occupants of the caravans on the land to try to ascertain information about the personal circumstances and welfare needs of the occupants. The site visit found that Ranch Park is divided (by fencing) into 5 approximately equal size pitches/plots, with each of these pitches containing between 4 and 6 static caravans. A total of 24 static caravans were sited at the Ranch Park site – almost five times the number of static caravans that were previously consented in WA/2021/02392.

Site visit checks undertaken to ascertain the welfare of occupants included going caravan to caravan in attempt to make contact and identify occupants, local GP checks and relevant health needs, identifying whether there were children on site as well as any educational needs or relevant dependents. A number of caravans at the time of visit were unoccupied / no gas supply or belongings inside. A toy car was seen outside one of the 24 caravans, but no children were directly encountered at the time of the site visit. There were a number of residents of the static caravans who confirmed on site that they were not gypsy / travellers.

Therefore, following this site visit, a Breach of Condition Notice (BCN/2025/02) was served in relation to three conditions attached to WA/2021/02392. These were as follows:

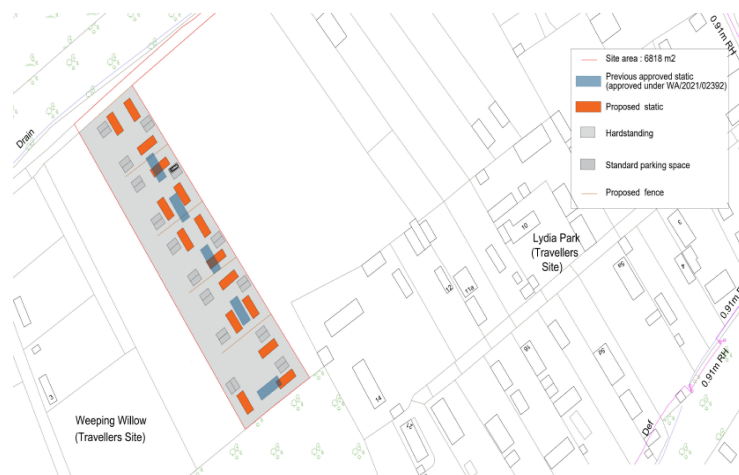
Condition 1: The development hereby permitted shall be carried out in accordance with the approved plans listed below: Unnumbered - Proposed Site Layout Plan - received 8th July 2021. Unnumbered - Amenity Building Front and Rear Elevations - received 8th July 2021. Unnumbered - Amenity Building Side Elevations - received 8th July 2021. Unnumbered - Amenity Building Floor Plan - received 8th July 2021. No material variation from these plans shall take place unless otherwise first agreed in writing with the Local Planning Authority.

Condition 2: The site shall not be occupied by any persons other than gypsies and travellers as defined within Annex 1: Glossary of Planning Policy for Traveller Sites August 2015.

Condition 4: No more than 5 static caravans and 5 towing caravans, as defined in the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968 as amended (of which no more than 1 on each pitch shall be a static caravan) shall be stationed on the site at any time.

A period of compliance was set at three months from the date of receipt of the BCN – 16/10/2025.

Following the BCN, and to partly regularise issues on the site, the applicant submitted a planning application in November 2025 (WA/2025/02229) for the use of land for the siting of 10 additional static caravans and resiting of the existing of 5 caravans. (retrospective) for a total amount of caravans on the site of 15. The proposed block plan of WA/2025/02229 is shown below:



Proposed Block Plan (WA/2025/02229) (not to scale)

This planning application was formally refused on 07/01/2026 on the following two grounds:

- 1) The proposal results in a notable intensification of development over the previous consent WA/2021/02392 that would be overdevelopment, with a lack of any planting / mitigation to soften the overly dense scheme proposed. The proposed development would be unacceptable in design terms and would not safeguard nor recognise the intrinsic character and beauty of the open countryside or Area of Great Landscape Value at odds with Policies TD1, RE1 and RE3 of the Local Plan (Part 1) 2018, Policies DM4, DM15 and DM37 of the Local Plan (Part 2) 2023, Policy BNP-G3 of the Bramley Neighbourhood Plan, Paragraph 187 of the NPPF (2024) and Paragraph 27 of the PPTS (December 2024).
- 2) The proposal intensifies the site to a degree that would be significantly harmful to any future occupant's reasonable expectation of a suitable standard of accommodation and their residential amenity. The lack of any amenity provision (external and internal within an amenity building) or play space for children, lack of any greening on site, lack of adequate touring caravan / trailer provision is a significant harm of this proposal that would create a substandard level of accommodation for occupiers of the site. Static caravan pitches fall well below sizing requirements and the personal circumstances provided do not justify the unacceptable living standards of future and existing occupants that result from this proposal. The proposed development is completely at odds to Policy DM37 of the Local Plan (Part 2) 2023, Policy AHN4 of the Local Plan (Part 1) 2018 and the PPTS (December 2024).

The proposed changes sought here seek to reduce the number of caravans proposed on site from 15 static caravans (as sought for WA/2025/02229) to 10 static caravans. The new proposal also includes the erection of associated dayrooms and cycle storage. The proposed block plan for this application is shown below:



Proposed Block Plan (WA/2026/00215) (not to scale)

The test is whether having regard to the changes, the current proposal has overcome the objections to the previously refused scheme WA/2025/02229 and is acceptable in its own right.

9. Impact on Countryside, AGLV and visual amenity

The site is located within the Countryside beyond the Green Belt and is situated outside any defined settlement boundary. Policy RE1 of Waverley Local Plan Part 1 (LPP1) states that in this area the intrinsic character and beauty of the countryside will be recognised and safeguarded in accordance with the NPPF.

The site is also located within the locally designated Area of Great Landscape Value (AGLV). Policy RE3 of LPP1 states that the AGLV will be retained for its own sake and serves a buffer to the Surrey Hills National Landscape, until there is a review of the National Landscape boundary.

Policy TD1 of LPP1 requires development to be of high-quality design and to be well related in size, scale and character to its surroundings. Policy BNP-G3 of the Bramley Neighbourhood Plan seeks to manage development in a similar vein and requires new development to be of a high quality and inclusive design that responds to the distinctive local character of the area in which it is located.

Policy DM15(b) of the Waverley Local Plan Part 2 (LPP2) states that development in rural areas should recognise the natural beauty and undeveloped character which is intrinsic to the open countryside, together with the distinctive character and pattern of development.

As discussed previously for WA/2025/02229, the application site comprises a rectangular shaped 'wedge' of land situated largely adjacent between two sites that have been granted planning permission for use as gypsy traveller sites (WA/2020/1866 to the east; WA/2019/0515 to the west), with further gypsy sites within the wider vicinity that form part of the immediate character of the area. There is a line of trees opposite the access to the site, on the northern side of the private access track off Stovolds Hill, which separates the application site from open countryside to the north.

Whilst the application site is located within the Countryside, outside of any settlement boundary, the proposed development must be viewed within the context of the existing development within the immediate vicinity. In this setting, the proposed development would comprise infill development that does not expand the envelope of existing development on the southern side of the access road into the open countryside to the north and would not constitute countryside encroachment.

The proposal remains a notable intensification over that which was approved at the Ranch Park site originally. However, the reduction of five static units in comparison to WA/2025/02229 does allow more spacing between units that would not wholly comprise hardstanding. Unlike the previous scheme, the layout does allow for suitable car parking for each caravan unit and a day room for each pitch (two caravans per pitch). Native hedging and small communal grassed spaces would provide some degree of visual relief with hedging shown on the Proposed Block Plan on the northern aspect adjacent to the open countryside providing a slightly softer transition from developed to undeveloped areas. This would need to be controlled via a Landscaping condition. It is noted that Condition 7 of WA/2021/02392 was not complied with previously – however, the lack of

compliance with this condition remains a consideration as part of the ongoing Planning Enforcement enquiries, and if they did not comply with any such condition imposed herein, then a further BCN may be served to enforce that greening as set out comes forward.

With all matters considered, the amended layout with spacing for dayrooms, green grassed areas for children's play, hedging on boundaries and appropriate parking does allow, whilst still a notable intensification, a less intense form of development, that on balance, would not be considered an overdevelopment of the site.

Therefore, the proposal has overcome Refusal Reason 1 for WA/2025/02229 and would, given the matters stated above, respect the immediate countryside location and the locally designated Area of Great Landscape Value (AGLV) in accordance with Policies RE1, RE3 and TD1 of LPP2, Policies DM4 and DM15(b) of LPP2 and Policy BNP-G3 of the Bramley Neighbourhood Plan.

10. Impact on the Setting of the Surrey Hills National Landscape

It is relevant to note that land to the north of Dunsfold Road (approximately 300m from the application site) is within the Surrey Hills National Landscape. Whilst it is accepted that the site lies outside of the Surrey Hills, Policy RE3 of the Local Plan (Part 1) 2018 also acknowledges that the setting of the National Landscape will be protected where development outside its boundaries harm public views from or into it.

As detailed for WA/2025/02229, in terms of the Surrey Hills National Landscape, the site is set a relatively sizeable distance of 300m from the boundary itself with screening along the Dunsfold Road boundary that provides only glimpses of the site from the road. Officers do note important long-range views are available of the Stovolds Hill site from Hascombe Hill (approximately 1.9km to the north-west). However, unlike a number of gypsy / traveller planning applications at a pending appeal inquiry to the north of the access point, this specific site is already well related to the envelope of development at Stovolds Hill and therefore, such intensification would not be readily perceivable from such identified viewpoints given this relationship to existing gypsy / traveller sites that flank either side of the site.

For these reasons, no harm to the setting of the Surrey Hills National Landscape is identified in accordance with Policy RE3 of the Local Plan (Part 1) 2018.

11. Domination of the Settled Community

Policy C of the PPTS states:

"When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community."

Paragraph 26 of the PPTS again echoes this principal and reiterates *"Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate, the nearest settled community"*.

The various existing gypsy and traveller settlement on the western side of Stovolds Hill is large and already dominates -in spatial terms - the nearest settled community comprising of ~20 dwellings to the south on Stovolds Hill.

This application proposal, alike WA/2025/02229, represents an infill development, situated between existing gypsy/traveller sites, and crucially, it does not extend the physical envelope of the settlement to the north or encroach further into the open countryside. The development is located to the south of a private access road, and as such, it does not impinge on the land to the north where no planning permission exists for a gypsy / traveller use.

While the granting of planning permission would result in an increase in the gypsy/traveller population, it is important to emphasize that Policy C of the PPTS primarily concerns the scale of development, with the spatial arrangement of the site being the key determinant. The existing gypsy/traveller settlement already exerts a significant presence in the locality, in terms of both scale and land use, and has established a notable dominance over the nearest settled community. However, the proposed development does not extend or exacerbate the spatial boundaries of the settlement, and thus, it does not contribute to any additional physical or visual dominance. The spatial relationship between the gypsy/traveller sites and the nearest settled community, as a result of this application, remains largely unchanged.

As such, the proposed development respects the existing spatial limits and would not further intensify the perception of dominance.

Considering the above, the proposal complies with Policy C of the PPTS.

12. Impact on Neighbouring Residential Amenity

Policy DM5 of the Waverley Local Plan (Part 2) (LPP2) states that development should avoid harm to the amenity of future occupants and existing occupants of nearby land, buildings and residences including by way of overlooking, loss of daylight or sunlight, or overbearing appearance.

Given the single storey nature of caravans, the proposals will not give rise to harm to the residential amenity of neighbouring gypsy / traveller sites in terms of overlooking, loss of light, or overbearing development and the development would accord with Policy TD1 of the Waverley Local Plan (Part 1) and Policy DM5 of the Waverley Local Plan (Part 2).

13. Quality of Accommodation and On-Site Facilities

Policy AHN4 of the Waverley Local Plan (Part 1) (LPP1) states that proposal for permanent sites for Gypsies and Travellers will only be permitted if the site is able to accommodate on site facilities for the parking and manoeuvring of vehicles and storage, play and residential amenity space.

Policy DM37 of the Waverley Local Plan (Part 2) (LPP2) sets out the design principles for gypsy and traveller sites. The policy is designed to supplement policy DM4 of LPP2 but is tailored to the specific needs of Gypsies and Travellers.

The policy states that each pitch should measure at least 500m² (unless extended families are sharing facilities, in which case their needs will be assessed individually) and provide the following:

- a) A utility building
- b) An amenity area

- c) Hard standing for a trailer, touring caravan and another vehicle.
- d) Landscaping
- e) Access that promotes the ease of movement whether walking, cycling or driving
- f) Sufficient provision for waste management

The policy also states that provision of play space will be required at a site-wide level. The supporting text for this policy states that the 500m² figure has been established to ensure that the final pitch design can accommodate all the necessary elements, including landscaping, play space, and access arrangements.

This is general accordance with the thrust of the PPTS which states at Paragraph 27, amongst other measures, that when considering applications, local planning authorities should attach weight to sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness, promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children and not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.

Policy DM4 of LPP2 states that new development will be expected to be of high quality design. The policy states that the principles of good design should be incorporated by ensuring that ancillary and utility facilities are designed into the proposal from the outset (DM4(g)).

The application WA/2025/02229 previously provided an extremely dense relationship with three static caravans on each of the five pitches previously consented. There was no space provided for amenity areas or amenity buildings for occupants, no landscaping, no play space, no adequate hard standing left available for tourer caravans or any indication of sufficient space for waste management. The intensification was considered harsh and dense, with hardstanding across the entirety of the site with no greening and no low-level fencing, with pitches subdivided by high timber board fencing. The proposal did not promote healthy lifestyles with no play space provision for children, no greening sought and lack of consideration of ease of movement, with no adequate space for amenity buildings that may include bikes, or adequate parking for all of the proposed static caravans to provide suitable space for tourer caravans / trailers.

In terms of this new proposal, whilst still a noted intensification over the original permission WA/2021/02392, the amended scheme will have a day room for each pitch (two caravans per pitch) and provides two car parking bays for each caravan unit which could be used for touring caravans. A specific condition will be attached limiting the amount of static and touring caravans on site.

There will be some landscaping, with native hedging and small communal grassed spaces providing some degree of visual relief and play space for children. There is a better consideration of the end-user with refuse storage and cycle storage, promoting alternative sustainable modes of transport, considered into the proposal from the outset. Timberboard fencing between units has been removed in favour of hedging which would be controlled by the Landscaping condition. Waste management will be discussed in further detail below.

The site layout also accords with minimum separation distances of caravans as set out in the Model Standards 2008 for Caravan Sites in England, with each caravan located at least 6m from one another for caravan site licensing requirements on fire safety.

Overall, subject to a landscaping condition, cycle parking condition and limiting the site to 10 static caravans and 10 touring caravans, officers consider the proposal intensifies the site to a degree that would be acceptable and provide a reasonable level of accommodation for gypsy / traveller families. The proposed development, when the policy is read as a whole, would comply with Policy DM37 of the Local Plan (Part 2) 2023, Policy AHN4 of the Local Plan (Part 1) 2018 and the PPTS.

14. Flood Risk / Drainage

Policy CC4 of the Local Plan (Part 1) 2018 states that in order to reduce the overall and local risk of flooding, development must be located, designed and laid out to ensure that it is safe; that the risk from flooding is minimised whilst not increasing flood risk elsewhere and that residual risks are safely managed. In those locations identified as being at risk of flooding, planning permission will only be granted where it can be demonstrated that it is located in the lowest appropriate flood risk location, it would not constrain the natural function of the flood plain and where sequential and exception tests have been undertaken and passed.

Officers note comments from Alfold Parish Council and comments made by the Lead Local Flood Authority. The site is not major development as defined in Annex 2 of the NPPF – whilst the site boundary measures around 0.53ha, a gypsy / traveller use is not ‘housing’ and falls within a sui generis use and not Class C3 use. Therefore, for the purposes of the NPPF, as the site is ‘non-residential development’ and is below 1ha, the application is not major development.

This is important as whilst Policy CC4 encourages SuDS on smaller sites, it is only required on major development. Therefore, there is no requisite to provide SuDS in this case.

The whole of the development site lies entirely within Flood Zone 1 of the Environment Agency Flood Map, being the zone with risk of 1 in 1,000 year (0.1% AEP) or less for river flooding. In line with the Flood Risk Vulnerability Table within the NPPF, the exceptions test will not be required for the site, and the proposal is sequentially appropriate.

The land on which the 10 static caravans are proposed is not within a Critical Drainage Area (Footnote 63 of the NPPF) and the Environment Agency’s Risk of Flooding from Surface Water (pluvial) flood mapping identifies the site (of the caravans) at very low risk of pluvial flooding. A portion of the shared access near to Stovolds Hill is identified at High Risk of Surface Water Flooding. However, no changes to the access are proposed and it is not considered, given the extent of development at Stovolds Hill that utilise this access and that no works or changes are proposed here, that such intensification would materially be more harmful than the existing situation in relation to flood risk (no further built form in this area that would worsen the situation). Therefore, a condition on surface water flooding would not be NPPF compliant in this instance.

Officers have noted comments from the Environmental Health team that several sites in this area have connected foul drainage such that they empty into the stream/ditch to the north and EH have been involved with these ongoing issues in an attempt to rectify the

situation. Regardless of the separate legislative regimes available to both the EH and the Environment Agency on unauthorised discharges into stream / ditches, for any new planning application this is a concern, especially given the proposal does not provide any information on sufficient foul waste management. In line with EH comments, a condition will be attached that suitable foul water drainage solutions are provided for.

Subject to a foul water drainage condition, the proposal therefore accords with Policy CC4 of the Local Plan (Part 1) 2018 and guidance within the NPPF and NPPG.

15. Highways and Access

Policy DM9 of the Local Plan (Part 2) 2023 states that in order to promote sustainable transport modes and patterns, development should provide safe and convenient access for all highway users in a way which does not compromise pedestrian and cycle movements, or compromise access to the highway and public transport facilities and services.

The proposed site will result in an intensification of vehicle trips at Crocus Lane and Stovolds Hill. Visibility at the existing access is restricted by vegetation and earth banks within the highway verge. Therefore, a condition has been included to ensure that the splays are cleared either side of the access. This will provide improved visibility for vehicles associated with the proposed development.

The site is not located in a sustainable location in transport terms, and it is likely that residents of the development will be dependent on trips via the private car. The CHA has not objected on this basis due to the context of these proposals; the site is located within a large and established settlement, and the specific nature of the proposed site generally requires more rural locations. To ensure that sustainable travel options are supported and encouraged, a cycle storage / charging condition has been attached.

Subject to conditions, the development would promote sustainable transport modes and provide safe and convenient access for all highway users in accordance with Policy ST1 of the Local Plan (Part 1) 2018, Policy DM9 of the Local Plan (Part 2) 2023 and Section 9 of the NPPF.

16. Biodiversity and compliance with Habitat Regulations 2017

Policy NE1 of the Waverley Local Plan (Part 1) (LPP2) states that the Council will seek to conserve and enhance biodiversity. Development will be permitted provided it retains, protects and enhances biodiversity and ensures any negative impacts are avoided or, if unavoidable, mitigated.

Policy DM1 of the Waverley Local Plan (Part 2) (LPP2) seeks to control the environmental impacts of development, and DM1(9) states that development should avoid negative impacts upon biodiversity deliver the minimum biodiversity net gain of 10% as required by the Environment Act 2021.

Protected Species / Habitats

The application site is not within, adjacent to or within the buffer zone of any internationally, nationally or locally designated habitats sites. The submitted application

form and biodiversity checklist indicates that the applicant believes that the proposal would not be likely to affect features of biodiversity or geological conservation interest.

Biodiversity Net Gain

The proposed development is part retrospective, and the works would fall within the 'de minimis' exemption. Therefore, no BNG is required on this site as outlined in the Environment Act 2021.

The development would therefore accord with Policy NE1 of the Local Plan (Part 1) 2018, Policy DM1 of the Local Plan (Part 2) 2023 and Paragraphs 192 and 193 of the NPPF 2024.

17. Climate Change & Sustainability

Policy DM2 of the Local Plan (Part 2) 2023 states that all development should seek to maximise energy efficiency and reduce carbon emissions through its design, structure, orientation and positioning, landscaping and relevant technology.

A Climate Change and Sustainability Checklist has been submitted in support of the application. Given the nature of development, it is considered would comply with the relevant policies and guidance. No concern is therefore raised.

18. Personal circumstances, Human Rights and the Public Sector Equality Duty, and best interests of the children

As discussed in this case, officers have not identified any planning harm. However, it still remains important to consider the personal circumstances, Human Rights and the Public Sector Equality Duty, and best interests of the children in any planning assessment.

Page 38 of the supporting Planning Statement has been submitted stating – 'I have not submitted personal circumstances of the applicants at this stage as it is not considered material to the application'. In any event, officers have reviewed the personal welfare of those on site, on the available evidence before them.

As stated above, site visit checks on 09/09/2025 were undertaken to ascertain the welfare of occupants included going caravan to caravan in attempt to make contact and identify occupants, local GP checks and relevant health needs, identifying whether there were children on site as well as any educational needs or relevant dependents. A number of caravans at the time of visit were unoccupied / no gas supply or belongings inside. A toy car was seen outside one of the caravans, but no children were directly encountered at the time of the site visit. There were a number of residents of the static caravans who confirmed on site that they were not gypsy / travellers.

However, officers have had mind that some of those who may have not answered / responded to site visit checks or those who may have moved in following site visits, and a decision on this application could lead to subsequent Enforcement action that may result in their displacement from the site that could result in a vulnerable roadside existence. Whilst the Enforcement team could not verify children on site, one of the occupants stated their co-dependent was pregnant and a toy car was seen outside one of the caravan units that did not answer.

Article 8 of the European Convention on Human Rights as incorporated into the Human Rights Act 1998 (HRA) states that everyone has a right to respect for private and family life, their home and correspondence. This is a qualified right, whereby interference may be justified in the public interest, and it would be proportional to do so.

Additionally, the Council – as a public authority – has to have due regard to the Public Sector Equality Duty (PSED) contained in the Equality Act 2010, which sets out the need to eliminate unlawful discrimination, harassment and victimisation and to advance equality of opportunity. The applicant and family have put forward they are Irish travellers and therefore have the protected characteristic of race for the purposes of PSED.

In this case, five static caravans have been allowed on site under WA/2021/02392 and therefore five gypsy / traveller families would not be displaced by this decision.

In regard to the additional five static caravans that constitute the unauthorised works, certain individuals, specifically a pregnant co-dependent and a potential child on-site, may be affected by this decision, as it is not guaranteed that these individuals would be the five gypsy / traveller families to remain. The negative impacts of refusing the application arise since the families may be forced to leave where they are currently residing and take up a roadside existence or occupy an unauthorised site. Their educational and health needs lends some additional weight in favour of the application.

In this case and on balance, officers have not identified any specific planning harm from this proposal. Therefore, the need simply adds additional weight in support of the scheme.

19. Conclusion

The planning balance assessment concludes that the proposal is in accordance with the Development Plan, as such, planning permission is recommended for approval.

Recommendation

That permission be **GRANTED** subject to the following conditions:

1. Condition:

The plan numbers to which this permission relates are:

- Location Plan (1:1250)
- Proposed Block Plan (GP/02/25 Rev C)
- Floor Plans and Elevations (GP/05/26)
- Proposed Dayroom Floor Plans and Elevations (GP/03/26)
- Maxess E Pro Bike Shed External Measurements Specification Sheet

The development shall be carried out in accordance with the approved plans.

Reason:

In order that the development hereby permitted shall be fully implemented in complete accordance with the approved plans and to accord with Policy TD1 of the Local Plan (Part 1) 2018 and Policies DM1 and DM4 of the Local Plan (Part 2) 2023.

2. Condition:

The additional static caravans hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans (Drawing No.GP/02/25 Rev C) for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking / turning areas shall be retained and maintained for their designated purposes.

Reason:

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with Policy DM9 of Local Plan Part 2 (2023) and the National Planning Policy Framework (2024).

3. Condition:

The additional static caravans hereby approved shall not be first occupied unless and until the junction between Crocus Lane and Stovolds Hill has been provided with a 2.4 metre by 150 metre visibility splay to the north and a 2.4 metre by 80 metre visibility splay to the south in accordance with a scheme to be first submitted to and approved in writing by the Local Planning Authority. Thereafter the visibility splays shall be kept permanently clear over 1.05 metres above ground.

Reason:

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with Policy DM9 of Local Plan Part 2 (2023) and the National Planning Policy Framework (2024).

4. Condition:

The additional static caravans hereby approved hereby approved shall not be first occupied unless and until the cycle facilities have been provided within the development site in accordance with the approved Floor Plans and Elevations (GP/05/26) and Maxess E Pro Bike Shed External Measurements Specification Sheet. Thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

Reason:

In order that the development promotes sustainable transport in accordance with Policy DM9 of Local Plan Part 2 (2023) and the National Planning Policy Framework (2024).

5. Condition:

The site shall not be occupied by any persons other than gypsies and travellers as defined within Annex 1: Glossary of Planning Policy for Traveller Sites (December 2024).

Reason:

To ensure control over the occupation of the development in accordance with Policies AHN4 and TD1 of the Local Plan 2018 (Part 1).

6. Condition:

If the use hereby permitted is to cease, all caravans, buildings, structures, equipment and materials brought onto and erected on the land for the purposes of such use shall be removed within 30 days of the date of the last use.

Reason:

In the interest of the character and amenity of the area in accordance with Policies RE1, RE3 and TD1 of the Local Plan 2018 (Part 1).

7. Condition:

No more than 10 static caravans and 10 touring caravans, as defined in the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968 as amended, shall be stationed on the site at any time, of which no more than two static caravans and two touring caravans shall be stationed on each of the 5 gypsy / traveller pitches hereby approved as shown on the approved plans.

Reason:

In the interest of the character and amenity of the area in accordance with Policies RE1, RE3 and TD1 of the Local Plan 2018 (Part 1).

8. Condition:

No commercial activities shall take place on the site, including the storage of materials, at any time.

Reason:

In the interest of the character and amenity of the area in accordance with Policies RE1, RE3 and TD1 of the Local Plan 2018 (Part 1).

9. Condition:

No floodlights or other forms of external lighting shall be installed on the site, other than that approved as part of this development, without the prior written permission of the Local Planning Authority.

Reason:

In the interest of the character and amenity of the area in accordance with Policies RE1, RE3 and TD1 of the Local Plan 2018 (Part 1).

10. Condition:

The play spaces / amenity areas and day rooms as shown on the approved Block Plan (GP/02/25 Rev C) and Proposed Dayroom Floor Plans and Elevations (GP/03/26) shall be made available to occupants of the static caravans hereby approved prior to occupation and retained for its intended purpose thereafter.

Reason:

In the interest of the amenity of future occupiers of the site in accordance with Policy AHN4 of the Local Plan 2018 (Part 1) and Policy DM37 of the Local Plan 2023 (Part 2).

11. Condition:

Within 3 months of the date of this decision, a detailed hard and soft landscaping scheme shall be submitted to, and approved in writing by the Local Planning Authority. The landscaping scheme shall be carried out strictly in accordance with the agreed details and shall be carried out within the first planting season after the approval of the discharge of condition or as otherwise agreed in writing with the Local Planning Authority. The landscaping shall be maintained to the satisfaction of the Local Planning Authority for a period of 5 years after planting, such maintenance to include the replacement of any hedges and shrubs that die or have otherwise become, in the opinion of the Local Planning Authority, seriously damaged or defective. Such replacements to be of same species and size as those originally planted.

Reason:

In the interest of the character and amenity of the area in accordance with Policies TD1, RE1 and RE3 of the Local Plan (Part 1) 2018.

12. Condition:

Within 3 months of the date of this decision, a scheme for the disposal of foul drainage and the disposal of 'grey water', together with a timetable for its implementation and details of its management, must be submitted in writing to the Local Planning Authority for approval. The approved scheme must be implemented in accordance with the approved details and timetable and the approved scheme shall thereafter be retained and managed in accordance with the approved scheme for the duration of the development.

Reason:

In the interest of environmental health to avoid indiscriminate waste disposal in accordance with Policy DM1 of the Local Plan (Part 2) 2023.

13. Condition:

Notwithstanding the provisions of Schedule 2, Part 2, Class A of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking, reenacting, or amending that Order), no fencing, wall or other means of enclosure shall be erected on site without formal written consent from the

Local Planning Authority.

Reason:

To ensure the landscaping proposed is not removed and replaced by hard facing structures in the interest of the character and amenity of the area in accordance with Policies TD1, RE1 and RE3 of the Local Plan (Part 1) 2018.

14. Condition:

No vehicle over 3.5 tonnes shall be stationed, parked, or stored on the site.

Reason:

In the interest of the character and amenity of the area in accordance with Policy RE1 of the Local Plan 2018 (Part 1) and retained Policies D1 and D4 of the Local Plan 2002.

Informatives:

1. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
2. Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.
3. The applicant is expected to ensure the safe operation of all construction traffic to prevent unnecessary disturbance obstruction and inconvenience to other highway users. Care should be taken to ensure that the waiting, parking, loading and unloading of construction vehicles does not hinder the free flow of any carriageway, footway, bridleway, footpath, cycle route, right of way or private driveway or entrance. The developer is also expected to require their

contractors to sign up to the "Considerate Constructors Scheme" Code of Practice, (www.ccscheme.org.uk) and to follow this throughout the period of construction within the site, and within adjacent areas such as on the adjoining public highway and other areas of public realm.

4. It is the responsibility of the developer to provide e-bike charging points with standard three-point plug sockets with timers (weatherproof if outdoors) to prevent them constantly drawing a current over night or for longer than required. Signage should be considered regarding damaged or shock impacted batteries, indicating that these should not be used/charged. Where communal bike stores with e-bike charging are required, access and fire escape routes shall not be used for the storage of e-bikes whilst charging. All communal areas where e-bikes are charged must be designed to provide detection, minimise the spread of fire from the cycle store area, and be designed to be fully compliant with Building Regulations. With regard to e-bike sockets in a domestic dwelling, detection measures should be provided, and an official e-bike charger should be used. Guidance on detection can be found in BS 5839-6 for fire detection and fire alarm systems in both new and existing domestic premises. Wherever e-bikes are charged, relevant additional fire resistance measures may be necessary as required by Building Regulations.
5. If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent.
6. If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards.

The Council confirms that in assessing this planning application it has worked with the applicant in a positive and proactive way, in line with the requirements of Paragraph 39 of the National Planning Policy Framework 2024.

Case Officer Sam Wallis

Signed: _____ Date: 17/03/2026

Agreed by Team or DC Manager: Joanne Hollingdale Date: 23.03.2026

Time extension agreement in writing seen by signing off officer: N/A

Agreed by Development Manager or Head of Planning Services N/A

