

**PLANNING STATEMENT INCORPORATING  
DESIGN AND ACCESS STATEMENT AND  
HERITAGE STATEMENT**

**OUTLINE APPLICATION FOR THE ERECTION OF UP TO 70  
RESIDENTIAL UNITS (INCLUDING 21 AFFORDABLE UNITS)  
WITH ASSOCIATED PARKING, CYCLE STORAGE, OPEN  
SPACE, ASSOCIATED DRAINAGE AND LANDSCAPING  
(ACCESS AND LAYOUT ONLY)**

**LAND AT**

**RUFFOLD FARM  
GUILDFORD ROAD  
CRANLEIGH  
SURREY  
GU6 8LT**

Submitted on behalf of: Mr and Mrs Rowe

April 2025

## 1. INTRODUCTION

1.1 This statement is submitted in support of an outline planning application for the construction of up to 70 residential units (including 21 affordable units) on land at Ruffold Farm, Cranleigh.

1.2 This statement sets out the context of the planning application, provides a detailed description of the works, undertakes an assessment of the proposal and demonstrates that the scheme is acceptable in principle and compliant with relevant local and national planning policies, and concludes that on this basis outline planning permission should be granted.

1.3 By being an outline application we seek approval only the access and layout at this stage, with all other matters reserved. This planning statement should be read in conjunction with the accompanying plans and drawings submitted as part of the application together with the following documents, which have been prepared to address the full range of material planning considerations relevant to the application:

- Planning statement incorporating D&A statement (Planit consulting)
- Transport statement (Vision Transport Planning)
- Preliminary ecological assessment (HCUK Group)
- Bio diversity net gain metrics (HCUK Group)
- Heritage report (Asset Heritage Consulting)
- LVIA & Landscape Masterplan (Land Management Services)
- Utilities report (Planit Consulting)
- Tree Survey, Arb impact assessment and method statement (Arbtech)
- Sustainability and energy assessment (Achieve Green)
- Drainage and flood risk assessment (EWE Associates)
- Archaeological assessment (Surrey County Council Archaeology unit)
- Agricultural classification (Reading Agricultural consultants)

1.4 The remainder of this Statement will cover:

2. *Background to the proposal*
3. *The Application Site and Surrounds*
4. *Planning History*
5. *Pre app response from SCC Highways*
6. *The Proposal*
7. *Relevant Planning Policy*
8. *Planning Assessment*
9. *The Planning balance*
10. *Summary and Conclusions*

#### Statement of community involvement

1.5 In the lead up to the submission we identified all properties and address points that we felt we should alert to the proposal some 3 weeks in advance of the submission. There were 19 in total who we felt should be made aware. A two page detailed letter including the masterplan was sent out first class to each address point and the occupiers were encouraged to contact the responsible planning consultant (Planit Consulting) with any comments or observations. The two page letter was sent on 11 March 2025 and only one person made contact with this office with some observations that had no bearing on the layout as proposed to be submitted. We provided a three week gap between sending the letter and submitting the application to the Council to ensure plenty of time was given for any responses to be received and any necessary changes made.

## 2 Background to the proposal

2.1 It should be noted that an outline application was submitted and refused in 2018/2019 for 11 reasons. These are summarised as follows: -

- Harm to rural landscape
- Insufficient information has been submitted detailing the Agricultural Land Classification of the land
- Loss of residential amenity
- Fails to respond to rural character of the area with cramped appearance
- Harm to grade II listed building; public benefits not overcoming that harm
- No provision of formal play space
- No safe pedestrian access for all users
- Decent access for waste collection vehicles
- Surface water strategy fails to comply with technical standards
- No legal agreement to secure commuted sums for contributions

2.2 It should be noted that Waverley Borough Council made a call for sites in early 2024 in order to progress and update a new local plan as the current local plan is out of date. A comprehensive 36 page supporting document was submitted to the Planning policy team in advance of the 31 March 2024 cut off. It is worth reiterating the conclusions of the analysis that were set out in paragraph 4.2 of that document.

*“The wealth of evidence is that, in view of the presumption in favour of sustainable development enunciated by Central Government, that the site can be brought forward and included within the new Local Plan because there is no interest of acknowledged importance demonstrably harmed, and more particularly:*

- a) *There is a general presumption in favour of development given the site's sustainable location, adjacent to the built-up urban area boundary of Cranleigh, complies with NPPF and relevant Development Plan policies.*
- b) *A forthcoming development can take the form, scale and layout commensurate with the surrounding locality part of Cranleigh and would not result in harm to the character of the area or visual amenity.*
- c) *A forthcoming design could ensure the occupiers of the new houses will have access to good quality amenity space that will not lead to material harm to neighbouring amenity.*
- d) *It is submitted that such a proposal could be built without detriment to the setting of the Grade II heritage asset – Ruffold Farm.*
- e) *The proposal can provide adequate parking and vehicular circulation, and safe access and egress into and out of the site and is thus in accordance with the adopted Waverley residential parking guidance.*
- f) *A development can come forward which would ensure that suitable mitigation can take place in regard to protected species, improve natural landscaping and the intrinsic wildlife value of the site, and both retain and not put pressure on the existing, important trees at the site.*
- g) *The site is not within an agricultural use.*
- i) *The site is not contaminated.*
- j) *A future development could provide affordable and self-build / custom-build homes, comply with relevant space standards and provide a mix of homes to reflect the housing requirements identified within the SHMAA.*
- k) *Development at this site will help meet the Council's housing land supply in a sustainable manner in full accordance of Waverley Borough Council's spatial strategy.*
- l) *The proposal does not conflict with the policies contained in the Development Plan and indeed is supported by those policies.*

### 3 THE APPLICATION SITE AND SURROUNDS

3.1 The land the subject of this application extends to 4.56 hectares and is located to the north east of Cranleigh. The site lies to the west of Guildford Road, directly south of Notcutts Garden Centre and north and west of the village of Cranleigh. The land is currently a field laid to pasture and is close to Ruffold Farm, a Grade II Listed Building, and associated barn which itself enjoys extensive grounds and also belongs to the applicant. The site is shown in the photographs below.



*Multiple views across the land the subject of this application*

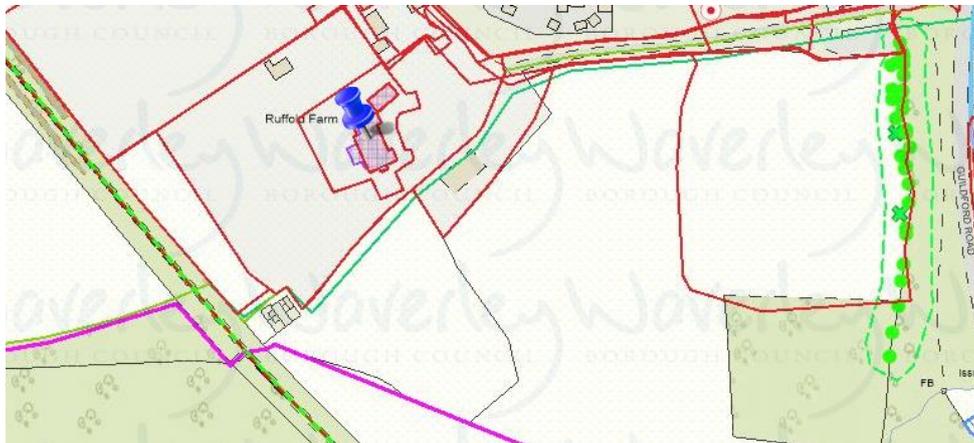
- 3.2 Access to the site is taken from Guildford Road via an existing track of 4.5m width which crosses a strip of common land. The entrance into Ruffold Farm is through a pair of gates with the closest residential dwelling to the site being Ruffold Lodge (seen in the image below – right hand side), originally the gatehouse to Ruffold Farm, which lies immediately alongside the access into Ruffold Farm and is included within the application red line site boundary.



*View from Guildford Road looking towards the access gates, Ruffold Lodge and driveway leading to Ruffold Farm*

- 3.3 The land is bounded by mature trees along its eastern boundary with Guildford Road and also to the south of the site. To the north west is the Grade II Listed Ruffold Farm, which is shrouded from view by large mature trees and planting.
- 3.4 The site is mainly and in the majority located within land designated as Countryside beyond the Green Belt, but with the existing access/entrance, (which also serves Ruffold Farm), situated within the Metropolitan Green Belt. The land is within close proximity to existing development to the west, east and north but just outside the immediate Cranleigh urban area.
- 3.5 There are no landscape designations associated with the land in that it is not designated as National Landscape (previously AONB) or an Area of Great Landscape Value (AGLV). It is also not in a Conservation Area. The land is classified as flood zone 1, which means the land has a low probability of flooding.

3.6 It is noted that a footpath (coloured purple on image below) dissects the southerly part of the site and then also dissects the 'Downs Link' which provides a track between Guildford and Shoreham on the south coast. There is a group tree preservation order covering the existing trees to the east of the land and close to the access track, running alongside Guildford Road as can be seen identified in luminous green on the screen shot immediately below taken from Waverley interactive maps. A site location map also shows the extent of the site.



*Surrey interact maps detailing footpath (purple) and group tree preservation order (luminous green)*



*Extent of site marked with red line, as well as access in and location of Ruffold Farm*

#### **4 PLANNING HISTORY AND PRE APP RESPONSE FROM SCC HIGHWAYS**

4.1 The planning history associated with Ruffold Farm and associated land is as follows.

<b>Planning reference</b>	<b>Proposal</b>	<b>Decision</b>
WA/2010/0209	Erection of extensions and alterations	Full Permission 08/04/2010
WA/2010/0210	Application for Listed Building Consent for erection of extensions and alterations	Listed Building Consent Granted 08/04/2010
WA/2014/2437	Alterations to outbuilding	Full Permission 17/02/2015
WA/2018/1636	Outline application for the erection of 20 dwellings	Refused permission 6/12/2018
WA/2024/01705	Certificate of Lawfulness under Section 192 for use of existing outbuilding as ancillary residential accommodation	Certificate approved 24/10/24

4.2 For completeness, the reason for refusal on application WA/2018/1636 are referenced. These are:-

- *The proposed development would result in harm to rural landscape features of merit, to the landscape character of the area and the intrinsic character and beauty of the Countryside. The proposal conflicts with national, strategic and local policies in this regard set out in Policies RE1 and RE3 of the Local Plan (Part 1) 2018, and guidance contained within the NPPF (2018).*

- *Insufficient information has been submitted detailing the Agricultural Land Classification of the land, therefore it has not been demonstrated that the proposal would not result in the loss of the best and most versatile land, contrary to retained Policy RD9 of the Local Plan 2002*
- *The proposed development would result in a loss of residential amenity to the neighbouring property of Ruffold Lodge, contrary to Policy TD1 of the Local Plan (Part 1) 2018 and retained Policies D1 and D4 of the Local Plan 2002.*
- *The proposed development fails to respond to the rural character of the area and would result in a cramped layout harmful to the rural character of the surrounding area as such would be contrary to Policy TD1 of the Local Plan (Part 1) 2018.*
- *The proposed development would lead to less than substantial harm to the setting of Ruffold Farm, an adjacent Grade II Listed Building. The public benefits of the proposal are not sufficient to outweigh the identified harm. The proposal would therefore be contrary to Section 66 of the Planning (Listed Buildings and Conservation Areas Act 1990, Policy HA1 of the Local Plan (Part 1) 2018 and retained Policies HE3 and HE5 of the Local Plan 2002.*
- *The proposed development does not include any provision for formal play space and as such would be contrary to Policies LRC1 and TD1 of the Local Plan (Part 1) 2018.*
- *It has not been demonstrated to the satisfaction of the Local Planning Authority that the proposed development provides safe and suitable pedestrian access for all users. The proposed development is therefore contrary to Policy ST1 of Waverley Borough Council's Local Plan 2018 and Section 9 of the NPPF 2018.*

- *It has not been demonstrated to the satisfaction of the Local Planning Authority that the proposed development provides safe and suitable vehicle access. The proposed development is therefore contrary to Policy ST1 of the Local Plan 2018 and Section 9 of the NPPF 2018.*
- *It has not been demonstrated to the satisfaction of the Local Planning Authority that the proposed development allows for the access of waste collection vehicles. The proposed development is therefore contrary to Page 29 of 31 Policies TD1 and CC2 of the Local Plan (Part 1) 2018 and retained Policies D1 and D4 of the Local Plan 2002.*
- *The surface water strategy for the proposed development fails to comply with the requirements laid out under Technical Standards. The proposed development is therefore contrary to Policy CC4 of the Local Plan (Part 1) 2018 and Section 14 of the NPPF 2018*
- *In the absence of a legal agreement to secure a commuted sum towards education provision and the provision of recreation and leisure facilities, and the provision of affordable housing, the proposal fails to make a contribution towards sustainable, inclusive and mixed communities and leisure and recreation facilities and is therefore contrary to Policies AHN1 and ICS1 of the Local Plan (Part 1) 2018 and the requirements of the NPPF 2018.*

## **5 SCC Highways response (received 11 February 2025) to formal pre app**

5.1 Vision Transport Planning requested pre application advice on 30 September 2024 with the submission of a highways statement and accompanying drawings. The advice provided followed a site visit on 3 December 2024 and a review of all the information and drawings supplied. The following bullet points summarizes the advice received.

- Acknowledge the December 2024 NPPF whereby a 'vision led approach' to transport planning is required.

- A traffic impact assessment has been carried out within the pre-application Highways Statement, using TRICs data to quantify the expected traffic impact of the proposal. The CHA considers that the parameters which have been used to calculate the trip rates and anticipated trip generation are satisfactory. The assessment yielded trip rates of 33 trips during the AM peak period and 36 trips during the PM peak period, with 308 movements expected across the day. The applicant has sought the CHA's views on whether further junction modelling will be required as part of the submission for a full planning application. The CHA consider that the proposed development's anticipated traffic generation does not warrant further detailed modelling in this instance.
- The existing access is not sufficient to accommodate a development of this scale.
- The CHA requires that the access carriageway is widened to 4.8m, to accommodate two-way movements.
- In terms of footway provision at this access, the CHA recommend that the existing footway provision on the western side of Guildford Road immediately north of the existing access (as shown in Figure 3) is extended to provide a 2m width footway on the northern side of the vehicular access to the site.
- The 2m footway, combined with the 4.8m carriageway, will have a total width of 6.8m, meaning that the existing vehicular access will need to be realigned slightly to accommodate for the existing dwelling at the current gated site access.
- Guildford Road has a posted speed limit of 40mph, therefore the CHA request that 2.4x120m visibility splays are provided at the access.
- In addition to the main site access, it is proposed to provide a connection to the Downs Link from the southern boundary of the development site.
- As previously discussed, the existing footway on the western side of Guildford Road will need to be extended to tie in with the footway being provided at the site access.

- Given that Guildford Road has a posted speed limit of 40mph and high traffic flows, an uncontrolled crossing with pedestrian refuge island must be provided, with dropped kerbs and tactile paving. In order to achieve this in proximity to the site access, alterations are likely to be required to the geometry of Guildford Road. To achieve more highway width to deliver a pedestrian refuge crossing, the CHA would be open to full, or partial removal of the bus laybys for northbound and southbound stops, and a slight relocation of the bus stops to ensure that the pedestrian crossing is sited between buses pulling away from one another (not towards).
- As part of any application submitted, a package of pedestrian connectivity improvements should be proposed, and shown on a plan
- Both existing bus stops should be upgraded
- Each of the proposed dwellings and at least half of any visitor parking spaces within the site should be provided with a fast-charge Electric Vehicle charging point
- High quality, secure, and covered storage for the parking of cycles should be provided within the site, with a minimum of 1 space per dwelling.
- The CHA request that Waverley Borough Council's 'Rest of Waverley' criteria is used (see appendix 2 of Waverley's Parking Standards) to determine the quantum of parking for the development, as set out within the Technical Note
- A design speed of 20mph should be used, and traffic calming used where necessary
- Site permeability for pedestrians and cyclists should be maximised, and access to the existing PROWs and footways within the site's proximity should form a key part of the emerging site layout.
- Having considered the proposals and subject to all of the above, it is not considered that there are any unresolvable issues arising from the proposed development from the perspective of the CHA.

## 6 THE PROPOSAL

6.1 This is an outline application for up to 70 dwellings. Access and layout are to be considered at this stage, with all other matters reserved. The master plan is as follows.



6.2 The headline figures of the application are:-

- 70 dwellings consisting of 12 four bed dwellings, 24 three bedroom units and 22 two bed units and 12 one bed units.
- 146 parking spaces and associated cycle storage spaces
- Internal roads, communal open space and courtyards and parking areas.
- Attenuation pond, pocket park and area for play all in the south east corner

## Housing mix

- Twelve 1 bedroom units 17%
- Twenty two 2 Bed units 31.4%
- Twenty four 3 Bed units 34.3%
- Twelve 4-5 Bed units 17%

**Total = 70 units**

## Areas per unit type

- 1 bed 37.5 sq metre footprint
- 2 bed 53.5 sq metre footprint
- 3 bed 58.9 sq metre footprint
- 4 bed 108 sq metre footprint

## **Siting, Amount and Layout**

- 6.3 The layout has been dictated by physical constraints associated with the site. These include a belt of trees along the eastern boundary of the site adjacent to Guildford Road and then a square shaped group of regenerative trees that indents the site from the eastern boundary as well as some other less dominant groups of trees located inside the site boundary. A footpath runs across the site from the eastern boundary to the far western boundary joining and dissecting the Downs Link and the layout proposed avoids building close to this public footpath.
- 6.4 The layout chosen relies on a mix of detached, semi-detached and flatted development with associated garaging and parking spaces as well as visitor parking spaces. The unit size would be a mix of 1 bed, 2 bed, 3 bed and four beds and would be policy compliant in terms of the housing mix.

- 6.5 Significant effort has been made to work around the mature trees and groups of trees resulting in very little loss of trees across the site. In the south eastern corner of the site there is a proposed attenuation pond, pocket park and Locally Equipped Area for Play (LEAP), which works around the existing tree group and dominant veteran tree.

### **Landscaping**

- 6.6 The site as found is very well screened on all boundaries by significant mature trees some of which are protected by a group Tree Preservation Order. In respect of the 2018 scheme the case officer identified that the principal landscape features of visual amenity value are from the mature trees at the site, and that the influence of the nearby built-up urban area boundary and road reduces the sense of tranquillity and remoteness of the site. That still remains the case and is a relevant consideration.
- 6.7 The intention is to keep nearly all of these trees. Currently six trees will be lost from the centre of the site as well as the corner section of the self-seeded square shaped group of trees, located in the south eastern corner of the site. The concept is to promote a detailed landscaping scheme which provides for significant new tree planting across the site for each plot proposed. There are also several buffer zones of new planting proposed close by to where existing planting exists in order to strengthen these existing planted areas. A Landscape Visual Impact Assessment and Landscape Masterplan has been prepared by Land Management Services and accompanies this submission.

## Ecology

6.8 Ecologists HCUK Group produced a Preliminary Ecological Assessment (PEA) in September 2024 (updated March 24). The findings of the PEA are as follows:-

- Three non-designated sites for nature conservation were recorded within 2km of the Site and Priority Habitat (Deciduous Woodland and Woodpasture and Parkland) was recorded on and adjacent to the Site.
- The habitats within the Site are dominated by Other Neutral Grassland with scattered mature trees. There are pockets of broadleaved woodland on Site and woodland surrounds the majority of the Site. A watercourse is located adjacent to the Site which was largely dry at the time of survey.
- The higher valued habitats (trees and woodland) should be retained where possible to minimise BNG loss and retain habitat connectivity. Habitat enhancement will likely require new native tree planting, scrub planting, re-seeding and managing grassland
- The habitats on Site are likely to be used by a range of protected and notable species and further survey in respect of these species groups will be required to inform the final layout and mitigation and enhancement requirements.
- Upon completion of the above the Statutory Biodiversity Metric should be completed to demonstrate at least 10% BNG in respect of habitats and hedgerows either within the Site or within land in control of the applicant or via an offsetting provider once adoption of the Biodiversity Mitigation Hierarchy has been demonstrated

6.9 Since then works has been carried out for any necessary follow up surveys as well as consideration of how best to approach Great Crested Newt Surveys. We note that Waverley District Council is not covered by District Licensing and therefore we seek to rely on traditional GCN licensing through Natural England (obtained post-development but it requires additional survey data to inform the planning report, which is factored in.

6.10 Work has been carried out around Bio Diversity Net Gain and this will be explored more thoroughly in the planning assessment section of this planning statement.

**Access and parking**

6.11 Pre application advice was carried out with the Surrey County Council Highways department which consisted of a comprehensive site visit, followed by an MS Teams meeting late November and then receipt of a response from SCC Highways on 11 February 2025. This is summarised under the planning history section.

6.12 Briefly it is worth setting out the main highway aspects of the proposal, particularly given that access and layout are being considered at this stage alongside the principle of housing on the land as well as layout.

- The access will be widened to such a degree that a refuse lorry and car can pass. Pedestrian and cycle access to and from the site will also be accommodated via the shared surface access, whilst a further pedestrian access to the site can be gained via Footpath 355 (public right of way), which passes through the southern section of the site.
- The site is located within an 800 metre walk distance of Cranleigh village centre. The site is therefore within a reasonable walking distance of an extensive range of services and facilities that are available, including food retail, GP surgery, dentists, cafés etc
- The nearest bus stops to the site are located within Guildford Road, to the north of the site access. The bus stop on the west side of Guildford Road is located adjacent to the site access, whilst the bus stop on the east side of Guildford Road is located circa 80 metres to the north of the site access, being located opposite the entrance to Notcutts Garden centre. Both bus stops

benefit from the provision of lay-bys, seating and timetable information.

- The access from Guildford Road will provide an initial 145 metres of the site access (measured from Guildford Road) designed as a carriageway with separate footway provision access to a shared surface carriageway within the site.
- Car parking will be provided in accordance with Waverley Borough Council's Parking Guidelines (October 2013). This will provide a recommended parking provision of 146 spaces.
- Cycle Parking will be provided in accordance with the minimum cycle parking standards set out within Surrey County Council's Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development and Waverley Borough Council's Parking Guidelines
- Electric vehicle charging points will be provided in accordance with standards that are set out within Surrey County Council's Vehicular, Cycle and Electric Vehicle Parking Guidance
- The street layout within the site has been designed to accommodate a large refuse vehicle in accordance with the specification set out by Waverley Borough Council within their 'Requirements for Refuse and Recycling Provision at New Developments' guidance.
- A TRICS based assessment has been carried out to quantify the traffic impact implications that may be associated with the development proposals. 70 residential dwellings will be likely to result in circa 308 trips to and from the site over the course of a day. Given the above trip predictions and allowing for trips to be distributed within the highway network (to the north and south of the access) and having regard to the nature of the surrounding highway network, it is considered that the anticipated traffic impact

would not warrant further detailed modelling (junction modelling) of the highway network.

- 6.13 The applicant has worked extensively with SCC County Highways to take on board all their advice and suggestions from the pre application advice stage.

### **Sustainability and renewable energy**

- 6.14 The energy strategy for the site has been developed by Achieve Green who have fully assessed the scheme and produced a report to accompany the application. They immediately conclude that the proposal (due to size) is not suitable for combined heat and power source.
- 6.15 In order to meet the expectations of the planning policy, the proposal is for air source heat pumps to be installed to meet all of the heating and Domestic Hot Water demand within each house and each apartment, and for photovoltaic arrays totalling 15 kWp to be installed on the available roof area of the apartment block.
- 6.16 This development will seek to achieve a reduction in CO2 emissions equivalent to 45% of the baseline through the installation of air source heat pumps and photovoltaic arrays.
- 6.17 The total projected reduction in emissions resulting from energy efficiency measures and the installation of renewable technology is 65% compared to the regulated emissions from a building designed to just meet Building Regulations (2021) Part L1. This surpasses the target reduction of 75% relative to the Building Regulations 2013 (equivalent to a target CO2 reduction of 44% relative to the Building Regulations 2021), and will therefore exceed the expected target of the Future Homes Standard when this comes into effect in 2025.

6.18 A summary of key energy-efficient design features is as follows:

- Low U-values, including triple glazing
- Airtight construction
- Mechanical ventilation with heat recovery
- Heating and Domestic Hot Water via heat pump system
- Solar photovoltaic installation.

### **Drainage and Flood Risk**

6.19 EWE Associates have been instructed to consider all drainage and flood risk associated matters on the land. They confirm that the whole site is located within flood zone 1 of the Environment Agency Flood map. The development site is greater than 1 hectare.

6.20 The consultants confirm two possible sources of flood risk – those being a local water course and surface water run off.

6.21 The detailed assessment will be carried out in section 8 of this planning statement but these were the consultant findings.

*“It is concluded that there is negligible risk of fluvial flooding at the proposed development site. However, the development will increase the drained impermeable area of the site and the runoff will need to be managed to minimise the impact of this runoff on the development and the surrounding environment. The selection of the most appropriate drainage system will be dependent upon the finalised development layout and the site specific ground investigation data.”*

## 7 RELEVANT PLANNING POLICY

7.1 Section 70(2) of the *Town and Country Planning Act 1990* and Section 38(6) of the *Planning and Compulsory Purchase Act 2004* require all applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

### **National Planning Policy Framework December 2024/25**

7.2 The National Planning Policy Framework (NPPF) serves as the overarching planning policy document for England and is a material consideration in planning decisions. The key provisions that relate to the application are provided below.

- Chapter 2: Achieving sustainable development
- Chapter 4: Decision making
- Chapter 5: Delivering a sufficient supply of homes
- Chapter 8: Promoting healthy and safe communities
- Chapter 9: Promoting sustainable transport
- Chapter 10: Supporting high communications infrastructure
- Chapter 11: Making effective use of land
- Chapter 12: Achieving well-designed and beautiful places
- Chapter 14: Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 : Conserving and enhancing the natural environment

7.3 The Development Plan for Waverley Borough Council comprises:

- Waverley Borough Local Plan Part 1: Strategic Policies and Sites (February 2018)
- Waverley Borough Local Plan Part 2: Site Allocations and Development Management Policies (March 2023)

- 7.4 The Cranleigh Neighbourhood Plan came to the end of the adoption process in June 2024 following a referendum. The Council's website confirms that it was adopted on 15 July 2024 and is now being used to determine applications for development in Cranleigh.

**Waverley Borough Local Plan Part 1: Strategic Policies and Sites (February 2018)**

- 7.5 The following policies are relevant for this proposal:
- SP1 – Presumption in favour of Sustainable Development
  - SP2 – Spatial Strategy
  - ALH1 – Amount and Location of Housing
  - AHN1 – Affordable Housing
  - AHN3 – Housing Types and Sizes
  - RE1 – Countryside beyond the Green Belt
  - ST1 – Sustainable Transport
  - TD1 – Townscape and Design
  - NE1 – Biodiversity and Geological Conservation
  - NE2 – Green and Blue Infrastructure
  - CC1 – Climate Change
  - CC2 – Sustainable Design and Construction
  - CC4 – Flood Risk Management
  - ICS1 – Infrastructure and Community Facilities
  - HA1 – Protection of Heritage Assets

**Waverley Borough Local Plan Part 2: Site Allocations and Development Management Policies (March 2023)**

7.6 The following policies are relevant for this proposal.

DM1 – Environmental Implications of Development

DM2 – Energy Efficiency

DM4 – Quality Places through Design

DM5 – Safeguarding Amenity

DM7 – Safer Places

DM9 – Accessibility and Transport

DM11 – Trees, Woodland, Hedgerows and Landscaping

DM15 – Development in rural areas

DM20 – Development Affecting Listed Buildings, and/or their Settings

**Cranleigh Neighbourhood Plan 2021-2032 (July 2024)**

Cran 2 – Design of development

Cran 3 – Character of development

Cran 6 – Natural landscape and rural character

Cran 9 – Soil quality and erosion

Cran10 – Energy efficiency and design

Cran14 – Flood risk and drainage

Cran 15 – Transport and movement

Cran16 – Residential parking

**Other Guidance**

7.7 These following 'other guidance' planning documents are considered relevant to this submission.

- The National Planning Practice Guidance 2014 (NPPG)
- Council's Parking Guidelines (2013)
- Surrey Vehicular and Cycle Parking Guidance (2018)
- Cranleigh Design Statement (2008)
- National Design Guide (2019)
- Climate Change and Sustainability Supplementary Planning Document (October 2022)
- Open Space, Sport and Recreation Study (2012)
- Cycling Plan SPD (April 2005)

7.8 It should be noted that at the end of November 2024, Waverley Borough Council published a Five Year Housing Land Supply position statement with a base date of 1 April 2024. It correctly notes that the Five Year Housing Land Supply Position Statement reassesses the Borough's housing land supply position in accordance with the requirements set out in the National Planning Policy Framework (NPPF) published in December 2023 and the Planning Practice Guidance. Reference is made to the standard methodology and that 710 dwellings per year are needed. Because a 5% buffer needs to be applied this pushes the annual figure up to 746 home per annum.

7.9 The Council then confirms in paragraph 2.4 that “the number of net new homes that are deliverable in the five years between 1 April 2024 and 31 March 2029. The council can demonstrate that a total of 1,998 homes are deliverable within this period, equating to 2.68 years of housing land supply.”

7.10 We believe that the figure has dropped considerably lower to circa 1.28 years supply. This much lower figure is quoted in officer reports to Planning Committee.

- 7.11 It should further be noted that with the publication of the December 2024 NPPF the government published data showing the housing need based on the previous standard method and in December published the new housing need per region using the new standard method.
- 7.12 The figure has jumped from 710 dwellings to 1,481 dwellings. The average annual net additions for Waverley BC (2021,2022,2023,2024) as published comes in at 802 dwellings.
- 7.13 We note that Waverley has been instructed to not include Dunsfold Park in their housing supply calculations. This was a site close to Cranleigh that would provide 2600 houses, however due to delays and lack of any progress on the ground this permission can no longer be counted towards supply.
- 7.14 These two elements combined must mean that the published November housing land supply figure is unreliable and that the true figure is much lower.
- 7.15 In the printed minutes from the 17 December 2024 Executive meeting Cllr Townsend advised and explained that *“the new NPPF had been published and there was a significant increase in housing numbers which would have huge implications for Waverley. Including putting immense pressure on Planning; there was also no mechanism for infrastructure and there would be a state of perpetual tilted balance.”*
- 7.16 The situation will further be confounded by serious discussion occurring as to the removal of District Council status across Surrey and replaced by several unitary authorities. A White Paper was published on 16 December with Leaders of Councils invited to put forward unitary proposals in January 2025 and interim plans by March 2025.

## 8 PLANNING ASSESSMENT

8.1 This section of the statement assesses the proposal against the relevant planning policies and demonstrates that this scheme accords with adopted Local Plan and National Policies. The following areas will be considered:-

- The principle of development
- Impact on green belt (point of access only)
- WBC Housing land supply and consequences of such a low figure
- The layout of the units, access and parking areas
- Impact on the character of the area
- Heritage assessment
- Landscaping
- Amenity space
- Bins and refuse collection and servicing
- Highways and parking considerations and cycle storage
- Affordable housing and housing mix
- Living environment
- Impact on neighbouring dwellings
- Trees
- Ecology
- Biodiversity
- Drainage and flood risk
- Loss of any agricultural land
- Air quality
- Sustainability and renewable energy
- Utilities
- Waste and recycling
- Section 106 legal agreement

## **The principle of development**

- 8.2 This site lies within the Countryside beyond the Green Belt outside of any defined settlement area. The National Planning Policy Framework (NPPF), 2024 states that as a core planning principle the intrinsic character and beauty of the countryside shall be recognised.
- 8.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 has been updated by the Levelling Up and Regeneration Act 2023 – now refers to Section 38(5B) of the Planning and Compulsory Purchase Act 2004 which requires all applications for planning permission to be determined in accordance with the Development Plan and any national development management policies, taken together, unless material considerations strongly indicate otherwise.
- 8.4 Policy RE1 of the Local Plan reflects the advice in the NPPF and states that the intrinsic character and beauty of the countryside will be recognised and safeguarded. Policy SP1 of the Local Plan (Part 1) 2018 states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development. Policy SP2 sets out the Council’s spatial strategy which is to:
- avoid major development on land of the highest amenity and landscape value, such as National Landscape (Area of Outstanding Natural Beauty) and to safeguard the Green Belt;
  - Focus development at the four main settlements
  - Allocate other strategic sites. Additional sites will be identified and allocated through Local Plan Part 2 and neighbourhood plans; 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.”

8.5 There will clearly be some conflict with Policy RE1 by virtue of development of the land with up to 70 houses; however in the overall picture we contend this harm would be moderate and that the benefit of market and affordable housing, when taking on board the almost non-existent lack of housing supply we consider this provision must be given significant weight and clearly outweighs any identified conflicts.

**Impact on Green Belt (point of access only)**

8.6 There is a small element of the site, the access point (leading to Ruffold Farm) that does lie within the green belt. It should be noted that this matter was fully addressed in the case officer report for the 2018 refused application. In light of the access point remaining the same and in light of the policy context remaining the same. It is considered worth looking at how the case officer addressed the issue.

8.7 The report recognised that there would be minor works needed to the access point as well as linking up to existing pathways etc. The officer considered these works as minor and as engineering operations. Paragraph 155 (b) of the updated NPPF is clear that engineering operations can be considered appropriate development provided they preserve its openness and do not conflict with the purposes of including land within it.

8.8 The case officer confirmed that the limited extent of changes required would not harm its openness or conflict with the purposes of the green belt. It acknowledged the intensified use of the access but that this in itself would not constitute a material change of use. The officer concluded that the use of the access way (in the Green Belt) to serve a residential development would not constitute inappropriate development.

- 8.9 We contend that in respect of this application those same principles apply here afresh and that although there will be a greater number of units the resulting harm at the access point and immediate area will remain the same in Green Belt terms whether it is 20 houses or for up to 70 houses.

**WBC Housing land supply and consequences of such a low figure**

- 8.10 Waverley Borough Council have not secured a five year housing land supply figure for many years now and it has progressively got worse. The Council published a fresh position statement on their 5 Year Housing Land Supply in November 2024 which detailed a figure of 2.68 years. The position statement advises:- “Following the publication of the Housing Delivery Test results in December 2023, the Council has to apply a 5% buffer to its housing requirement. On this basis there is a total housing requirement of 3,728 dwellings for the five year period (the equivalent to 746 homes per annum). In accordance with the definition in paragraph 77 of the NPPF, Table 2 below sets out the number of net new homes that are deliverable in the five years between 1 April 2024 and 31 March 2029. The council can demonstrate that a total of 1,998 homes are deliverable within this period, equating to 2.68 years of housing land supply.”
- 8.11 However since the position statement being published in November 2024, the new NPPF has been published which includes a new standard method as well as new housing numbers per region and per Council. This shows a more than doubling of the previously accepted housing figure from 710 to 1481 per annum. This situation has been made worse by the Council unable to include the planning permission for 2600 homes at Dunsfold Park. The effect of these two matters means that the Council most likely has a supply of housing for 18 months, possibly less.

- 8.12 However matters have moved on since December 2024 and officers in their committee reports are utilising the following wording in respect of Housing Land Supply.

*“The Council’s current annual housing requirement is 1,481 dwellings based on the standard method. Applying the 5% buffer to the housing requirement for the five-year period of 1 April 2024 - 31 March 2029 increases the annual housing requirement to 1,555 dwellings. As at 1 April 2024 there were 1,998 dwellings that the Council considered to be deliverable in the five-year period, equating to a 1.28-year housing land supply. As the Council cannot currently demonstrate a five-year housing land supply, paragraph 11(d) of the NPPF 2024 is engaged via footnote 8. Therefore, unless the site is in an area, or involves an asset of particular importance that provides a clear reason for refusal, then permission should be granted unless it can be demonstrated that any adverse impacts demonstrably outweigh the benefits when assessed against the Framework as a whole.”*

- 8.13 The Council has begun the process of reviewing their local plan and in their published timetable on line they show that with the best case scenario a new Local Plan would not be adopted until December 2027, almost three years away. Ultimately this suggests that Waverley does not have a ‘plan led’ system in place for housing and no way of addressing their critical housing shortfall both for market and affordable housing.
- 8.14 In light of the Councils dire housing situation and inability to provide sufficient housing sites it is therefore put forward that the combined provision of up to 70 market housing, incorporating 21 affordable housing units carries significant weight in favour of the scheme.

8.15 Aside from the significant housing benefits both market and affordable, there would be other benefits that will be considered later in this statement. It will be shown collectively that the harm to the character and appearance of the area and conflict with the development plan would not significantly and demonstrably outweigh the benefits of market and affordable housing delivery. The proposed development would make an important contribution to the supply of housing given the identified shortfall in WBC's 5-year housing land supply.

8.16 It should be noted here that in the December 2024 NPPF document in chapter 2 entitled 'Achieving Sustainable Development' footnote 8 states:-

*“This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78; or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. See also paragraph 227.”*

8.17 Therefore because the Council cannot demonstrate the needed supply of housing the tilted balance applies. When considering the planning balance in line with the presumption in favour of sustainable development, in essence this means that permission should be granted unless “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits , when assessed against the policies in the NPPF taken as a whole”

- 8.18 The NPPF in paragraph 61 says “To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.”
- 8.19 Waverley BC have not been able to provide a 5 year supply for many years now and the current level is around one year which is woeful. There can be no doubt that the tilted balance is engaged and we cannot see any adverse impacts that should stop planning permission from being granted.
- 8.20 There is no plan in place or ‘magic wand’ to address Waverley Councils serious shortfall. The borough is heavily constrained, the work on a new local plan is not advanced and within this context the provision of 70 units (including affordable units) in touching distance of the Cranleigh urban area carries significant weight in favour of development. This will be returned to in the planning balance.

### **The layout of the units, access and parking areas**

- 8.21 The layout accompanying this application is logical, balanced and works to the open areas of the site avoiding trees and natural features. Assessing from the entrance it should immediately be noted that the scheme uses the existing single point of access that ultimately leads to Ruffold Farm located in the western boundary of the site and also belonging to the owner of this land. It will be remain as a single point of access, which Surrey County Council (Highways) are supportive of. The overall strategy is to provide access to a shared surface carriageway within the site.

- 8.22 Car parking will be provided in accordance with Waverley BC parking standards and minimum standards will be observed in respect of cycle parking. Electric vehicle charging points will also be policy compliant and in accordance with guidance and to that end each proposed unit will be provided with access to a minimum of one fast charge EVCP.
- 8.23 The street layout within the site has been designed to accommodate a large refuse vehicle in accordance with the specification set out by Waverley Borough Council. Swept path analysis has been carried out to form and design the street layout. The largest vehicle likely to require regular access to the estate is a refuse vehicle.

#### **Impact on the character of the area**

- 8.24 The site is located outside any defined settlement area, with the majority falling within the Countryside Beyond the Green Belt and only a small part (the access road) falling within the Green Belt.
- 8.25 In the refused 2018 application for 20 units the case officer set out the various tests for rural housing from the NPPF. These are now found at paragraphs 82-84 of the December 2024 NPPF, and then went on to assess whether housing on this land would constitute isolated dwellings. The officer concluded:-

*“Given that the site is located within the context of a built up area, the development would not appear visually isolated. Housing development at the application site would also have the potential to enhance and maintain the vitality of the community within nearby settlements. Page 11 of 31 Policy SP2 of the Local Plan (Part 1) refers to the Council’s Spatial Strategy to 2032 and the need to maintain Waverley’s character whilst ensuring development needs are met in a sustainable manner. This Policy states that development will be focused on four main settlements including Cranleigh and that strategic and non-strategic sites will be identified and allocated through Local Plan Part 2*

*and Neighbourhood Plans. Given the location of the proposed site to the developed area of Cranleigh and its subsequent public transport links and given that the scale and location of the proposed development would allow support for local services and therefore sustainable in the context of Policy SP2 of the Local plan (Part 1) 2018. Officers are satisfied that given these particular circumstances, the proposal would not represent an isolated development in the Countryside.”*

- 8.26 Previously there has been broad acknowledgement that the land is extremely close to a bus stop, located directly outside the site on the main road and that access to Cranleigh village is readily accessible by foot, bicycle or public transport.
- 8.27 Policy SP2 of the Local Plan (Part 1) refers to the Council’s Spatial Strategy to 2032 and the need to maintain Waverley’s character whilst ensuring development needs are met in a sustainable manner. This Policy states that development will be focused on four main settlements including Cranleigh and that strategic and non-strategic sites will be identified and allocated through Local Plan Part 2 and Neighbourhood Plans. In light of the juxtaposition between this land and the edge of Cranleigh village and when combined with positive transport links, sat alongside the lack of any meaningful housing land supply, as well as the containment of the site by natural features, this supply of up to 70 units would provide for a sustainable development which can be viewed as a logical extension to the village in the least sensitive location. The development can be viewed as sustainable in the context of policy S2 of the Local Plan (part 1) 2018.

### **Heritage assessment**

- 8.28 Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that 'in the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.
- 8.29 The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning: 3 ('GPA3'; 2nd edition December 2017). This document explains that setting is not itself a heritage asset; its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance. As the PPG accompanying the NPPF amplifies, an assessment of the impact on setting needs to take into account the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
- 8.30 Turning to policy, Chapter 16 of the National Planning Policy Framework sets out the framework for decision making in planning applications relating to heritage assets and conserving and enhancing the historic environment. Paragraphs 205-214 set out how the determining authority and conservation officer should consider potential impacts.
- 8.31 Policy HA1 (Protection of heritage assets) of the part 1 local plan and policy DM20 (Development Affecting Listed Buildings, and/or their Settings) of the part 2 local plan are the relevant policies in respect of this topic area and are generally reflective of the NPPF and its wording.
- 8.32 The single issue to be considered here is the relationship between the proposed housing development and Ruffold Farm which is a grade II listed building. The building was first listed in September 1987 and as part of the listing is noted as 'The Ruffold Farm House Hotel', but subsequently became a

private house. The officer report for the 2018 application notes in the heritage section the following

*“The proposed development site is located within the setting of Ruffold Farm, a medieval former hall house, adapted in the C17 and C19 centuries that once formed the principal building of an isolated agricultural holding. As a Hall house it was probably the dwelling of a yeoman farmer, although by the nineteenth century it was “gentrified” to become a house in the countryside rather than a farmhouse as before.”*

8.33 The land the subject of this application lies to the south of the listed building and is currently tall rough grassland that is periodically cut for hay. The listed farm house is reached via along driveway which is roughly 240 metres from the main road. On site, it is evident that the site is very well screened from view by a very mature belt of trees and shrubs.

8.34 The listing for Ruffold Farm does not provide any description of its significance and only refers to its appearance for description purposes.

**Ruffold Farm**

The official list description is set out below,

**RUFFOLD FARM HOUSE HOTEL**

List entry Number: 1189654

Grade: II

Date first listed: 28-Sep-1987

TQ 03NW CRANLEIGH C.P. GUILDFORD ROAD

5/63 Ruffold Farm House Hotel

*House, now hotel. C17, extended to ends in C19 and to rear. Timber framed on sandstone and render plinth with whitewashed brick infill to exposed frame above. White-washed brick extensions to left with tile hung gable, imitation frame with render infill to right hand wing. Plain tiled roofs stepping down to right of centre. Now half-H shaped plan with projecting gabled wings. Centre range originally a centre chimney house. Two storeys to ends, one storey and attics left of centre under two gabled and barge-boarded, diamond-pane, through-eaves dormers. Multiple re-built stack to left of centre. Corbelled end stack to left. Three framed bays to centre range. Arch bracing to right hand bay. Two diamond-pane first floor windows to right. Four ground floor windows, one larger than rest. Former door to base of chimney bay now blocked. Gabled wing to left with plat band over ground floor and two "cross" windows to each floor, those on ground floor under cambered heads. One large diamond-pane first floor window to right hand gable. Three windows on ground floor. Door to left hand return front in gabled porch. Timber framed extensions to rear. Coach house attached to front right with diagonal brick band over ground floor. Centre gable and sliding garage doors. Old external rear wall now preserved inside*

Listing NGR: TQ0443539715

8.35 Asset Heritage Consulting were instructed to assess the heritage implications of the development and its proximity and any impacts on Ruffold Farm and to consider the significance of the land to the setting of the heritage asset. A comprehensive report and appendices accompanies this outline application. The main findings of the heritage report are as follows: -

- Ruffold Farm is a former farmhouse of 15 century origins substantially remodelled in the 17<sup>th</sup> century with substantial additions in 20 century.
- It was grade II listed in 1987 when it was being used as a hotel from which it went to residential use.
- Ruffold Farm stands in its own extensive grounds and the report notes, *“to the front of the house at the end of the driveway and from just outside the front elevation there are glimpsed views of the application site through the mixed coniferous and deciduous belt of trees flanking this side of Ruffold Farm’s grounds where cars are parked.”*
- “The application site makes little contribution to what is significant about the setting of Ruffold Farm as a Grade II listed building. This is because the former farmhouse is not visible from the road and cannot even be seen by visitors to the property until the end of the long driveway from Guildford Road running westwards to the house beyond Ruffold Lodge is reached. While there are glimpsed views of the application site available through the trees that flank the parking area in front of the house, these are limited in extent and can only fleetingly be seen on arrival at or departure from Ruffold Farm.”
- “The grounds of Ruffold Farm are attractive and extensive and provide a more than sufficient buffer zone and breathing space around it.”
- “In my opinion, it is the area immediately in front of and directly to the south of the south return of the house that are the most significant in heritage terms (see plates 20-23), together with the extensive lawns to the west and their continuation to the north-east that make the highest positive contribution to the setting of the listed building and its significance.”

- “The setting of Ruffold Farm is effectively defined by its extensive and attractive, well-established and defined grounds, which despite the existence of the nearby Notcutt’s Garden Centre provide an appropriate buffer zone around it.”
- In this connection, the densely vegetated and treed south-western boundary of Ruffold Farm provides an effective screen between the listed building and the application site and vice versa.
- “This all means that the proposal to build 70 dwellings on the application site will have limited effect on the significance of the setting of Ruffold Farm as a Grade II listed building.”
- “I take the view that absolutely minimal harm is caused to heritage significance, a position which is, of course, consistent with the clear advice in the NPPG.”
- “If, however, the Council (or any other decision maker) should consider that a degree of heritage harm is caused by the development proposals and that paragraph 208 of the Framework is therefore relevant, such harm must still fall very much at the lower end of the scale of ‘less than substantial harm’ as that term is defined and used in the NPPF and NPPG.”
- “All the significance embodied in the asset itself would remain intact’ and that only a small part of the setting of the listed building is affected by the development proposals.”
- “In addition, the significant public benefits of the proposals, including the provision of 70 housing units in a District where these are sorely needed (see the Planning Statement prepared by Planit Consulting) mean that this is a case where it would be appropriate for the Council (or any other decision maker) to offset these benefits against any perceived heritage harm in the planning balance in the manner advised in the NPPF.”
- “I can see no material reason in heritage terms why planning permission should not be granted for the application proposals.”



Plate 20: Ruffold Farm, front (east) elevation



Plate 27: The large rear garden of Ruffold Farm, showing the rear elevation of the house



Plate 6: View from near the modern weatherboarded building (part of which is visible to the right) associated with Ruffold Farm towards Ruffold Farm

## Landscaping

- 8.36 The site is located within the countryside beyond the green belt outside any identified settlement area. Policy RE1 of the Local Plan, part 1 states that in areas such as this the intrinsic character and beauty of the countryside will be recognised and safeguarded in accordance with the NPPF.
- 8.37 Policy RE3 of the Local Plan (Part 1) 2018 sets out that new development must respect and where appropriate, enhance the character of the landscape in which it is located.
- 8.38 The NPPF in section 15, entitled conserving and enhancing the natural environment, paragraph 187 (b) and (d) are most applicable saying

- (a) *“recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”*
- (d) *“minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.”*

8.39 It should be noted from the 2018 officer report for 20 houses the broad description of the site which said, *“This section of the Low Weald is a relatively small sliver of land that runs either side of the Guildford Road from Stroud Common down through Rowly which consists largely of small scale pastoral fields with intact bounding hedgerows and tree belts. It provides a relatively rural setting, however the influence of the settlement and road reduces the sense of tranquillity and remoteness.”*

8.40 The officer report further notes that the principal landscape features of amenity value are the mature trees found on site, which provide for a contiguous attractive screen to the field beyond.

8.41 This outline proposal for up to 70 units seeks to retain nearly all mature trees on site. The only ones to be lost are three trees within the site and a small percentage of the square southern block of trees to facilitate some of the internal road and two house units.

8.42 Landscape Management Services were instructed to prepare a Landscape and Visual Impact Assessment and Landscape Master Plan. The primary findings were as follows:

- *“The Site carries no landscape, wildlife or heritage designations. It lies outside the settlement boundary of Cranleigh. It comprises chiefly flat, open grassland with a substantial number of high and moderate quality mature field trees, densely wooded boundaries which also feature distinctive mature trees, and a small area of woodland.*
- *The Site reflects some characteristics associated with the national and local landscape character areas in which it is located, including its function as part of a pastoral landscape, small irregular field pattern, tree cover, including mature oaks, and dense mature tree belts providing a strong landscape structure which contributes to landscape character and sense of enclosure. However, the Site is close to the main settlement of Cranleigh and is adjacent to a busy road, which diminishes overall tranquillity.*
- *In terms of geographical extents the proposals would affect only a very small part of the NCA and effects are assessed as Minor Adverse*
- *The proposals would introduce development into an area of existing grassland, trees and woodland set within relatively scattered development. The character of much of the Site would change from pastoral to residential. Footpath users would be aware of new residential development, and the path would become more suburban in character. However, the Site is already close to existing development and is visually well contained.*
- *The existing field pattern and densely vegetated field boundaries would be retained and enhanced.*
- *Nevertheless, the scale of change would be extensive and permanent, and effects on the WW7 Rowly Wooded Low Weald Character Area are therefore assessed as Moderate Adverse at completion. Over time, as proposed landscape treatments mature, it is anticipated that this would reduce to Minor Adverse.*
- *Effects on landscape pattern, trees and hedgerows and boundaries are therefore assessed as Minor Adverse*

- *Effects on land use, land cover, ecology and management are assessed as Moderate Adverse at completion, but would reduce over time to Minor Adverse.*
- *With regard to visual amenity, the Site benefits from a high level of visual enclosure, such that significant change and effects are confined to the footpath FP355 as it crosses the Site. Of the 18 identified viewpoints, 14 are assessed as Neutral or Negligible, largely because of the screening effects of characteristic extensive local tree cover and landform. This includes more distant viewpoints (16, 17, 18) within the designated National Landscape and AGLV.”*

8.43 The main elements within the Landscape master plan are

- Retention of mature woodland around the edge of the site to retain ecological connectivity and to enhance invertebrate assemblage and to provide value to foraging commuting bats
- Installation of bat boxes on suitable retained trees and new buildings
- Enhanced grass land habitats and structural diversity with new hibernacula to support terrestrial phase of amphibians
- Installation of bird provision on retained trees
- Promotion of ‘trim trail’ and ‘natural’ play features
- Proposed native shrub planting
- SUDS enhancement habitat where attenuation pond is located

### **Amenity space**

8.44 Amenity space is being provided in the far south eastern corner of the site. This can be identified on the master plan as it details a large 2000sq metre Locally Equipped Area for Play (LEAP), and Pocket Park and Attenuation Pond. This links into a large retained copse area and large veteran tree. These will provide for a trim trail and natural play features. There will be multiple benefits with this space in that it will offset the housing but also provide a genuine spacious area for future residents and visitors.

8.45 It should also be noted that within 300-500 metres there are several large pockets of public open space including the cricket green and pavilion that are there for all residents to use.

### **Highways and parking considerations and cycle storage**

8.46 The applicants highway consultants (Vision Transport Planning) have provided a detailed Transport Statement which assesses the development proposals and traffic impact.

8.47 This topic can be broke down to six main areas:-

- Policy context
- Access for the development
- Parking for residents and visitors
- Traffic impacts
- Electric charging and bicycle storage and charging
- Other highway mat

#### Policy context

8.48 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. Paragraph 116 advises that: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." Paragraph 117 states that: "Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

8.49 The NPPF recognises the importance of transport policies in facilitating sustainable development, and that planning decisions should have regard to local circumstances. In this regard, promoting sustainable transport forms an important element of the NPPF, which states at paragraph 110 that:

*“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”*

8.50 When considering the transport effects of development, the NPPF states in Paragraph 118 that: “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

8.51 Surrey County Council's Local Transport Plan (LTP4) was formally adopted on the 12th July 2022. The LTP4 aims to significantly reduce carbon emissions from transport to meet commitments to net zero emissions by 2050, in line with the Government's national legal commitment.

8.52 The key objectives of LTP4 are listed as:

- Net zero carbon emissions
- Sustainable growth
- Well-connected communities
- Clean air and excellent quality of life.

8.53 To achieve the above objectives the LTP4 sets out the following three principles:

- Avoid unnecessary travel by reducing the number and length of trips needed. We aim to achieve this through improving planning for homes and employment sites, travel planning and levels of digital connectivity
- Shift travel choices to more sustainable modes of transport, including public transport, walking and cycling, away from car use.
- Improve the energy efficiency of vehicles and operational efficiency of roads through technology improvements.

8.54 Policy ST1 of the LPP1 outlines that development schemes should be located where opportunities for sustainable transport modes can be maximised; make the necessary contributions to the improvement of existing, and provision of new, transport schemes; include measures to encourage non-car use; contribute to transport infrastructure improvements, where appropriate and viable; encourage the provision of new and improved footpaths, bridleways and cycleways; and make appropriate provision for car parking.

8.55 Policy DM9 of the LPP2 outlines that development should provide safe and convenient access for all highway users; incorporate a compliant and permeable highway design and layout; meet the highest standards of accessible and inclusive design; and should include adequate car parking spaces and secure cycle storage.

8.56 The following table summarises both vehicular and cycle parking standards that are relevant to the development proposals.

Land Use	Maximum Car Parking Standards (suburban edge/village/rural)	Minimum Cycle Parking
Residential 1 & 2 bed houses	1.5 + spaces per unit	Flats / houses without garages or gardens 1 space per unit
Residential 3 bed houses	2 + spaces per unit	Flats / houses without garages or gardens 2 spaces per unit
Residential 4 + bed houses	2 + spaces per unit	Flats / houses without garages or gardens 2 spaces per unit

Table 2.1 – Surrey County Council’s Vehicular and Cycle Parking Guidance

8.57 Policy Cran15 (Transport and Movement) of the Cranleigh Neighbourhood Plan addresses connectivity, and promotes the concept of walkable neighbourhoods. In addition there are 5 measures that development proposals should demonstrate.

Access for development

8.58 Following the receipt of the pre app response from the County Highway Authority, various changes have been made the proposed layout. These include the following:-

- 5m carriageway /2 m footway plus minimum 1m serviced margin to be provided up to the loop access road.

- All other areas (except shared private drives) to be designed with a minimum shared surface carriageway of 6m plus 2m service margins to be indicated where houses driveways or parking bays front onto the carriageway.
- Existing pillars and gates to be removed from entrance to the site adjacent to Ruffold Lodge. The modified site access has been designed with visibility splays of 2.4 metres x 120 metres (in both directions).
- In two areas opposite the smaller flatted units increased footway width to 2 metres. At this point carriageway to reduce from 6m to 5m within footway areas.
- Raised surface features added where Footpath 35 crosses the access road, with driveways to be repositioned to avoid conflict with crossing points (minimum 2 metre clearance)
- 3 metre wide pedestrian cycle link to Downs Link provided



Existing Access

8.59 Access to the development would be from a single point of access off Guildford Road. This is shown in the photographs below. The access will be widened so that two way movement can be accommodated. The access itself is being promoted as a bell mouth junction with a 6m radii.

8.60 Given that Guildford Road has a speed limit of 40mph, the County Highway Authority will seek visibility splays of 2.4m by 120 metres.

8.61 The highway authority made it clear prior to submission they would like to see some highway improvements around the entrance the site. These included

- Extending the footway on the western side of Guildford Road
- A pedestrian crossing provided close to the access combined with pedestrian refuge
- Upgrading of both nearby bus stops to include improved shelter, real time passenger information displays, us stop pole, flag and timetable case, at least 9m of accessible kerbing to aid boarding and alighting

8.62 The site layout has been developed to incorporate a high degree of pedestrian and cycle permeability. Pedestrian and cycle access to and from the site will be accommodated via the main site access (from Guildford Road) and directly from the Downs Link. Further pedestrian access to the site can be gained via Footpath 355 (public right of way), which passes through the southern section of the site.

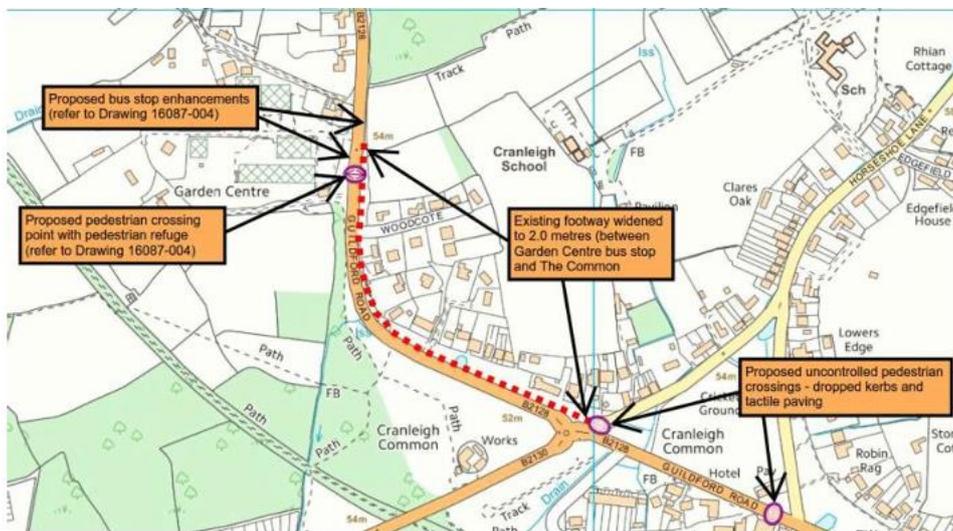


Figure 4.1 – Improvements to wider pedestrian infrastructure

Parking for residents and visitors

8.63 Parking for the dwellings is to be provided at two spaces per dwelling with four areas of visitor parking provided as well. At the entrance to the site are the smaller one and two bed units. The parking for these units would be located directly to the south and would contain 38 parking spaces combined with 8 visitor parking spaces.

8.64 This parking provision accords with appendix 2 of the Waverley Parking standards. The detailed breakdown is as follows:-

Dwelling size	Number of units	Recommended car parking provision per unit	Recommended parking provision
1 bed flat	12	1 per dwelling	12
2 bed flat	10	2 per dwelling	20
2 bed house	12	2 per dwelling	24
3 bed house	24	2.5 per dwelling	60
4 bed house	12	2.5 per dwelling	30
<b>Total</b>	<b>70</b>		<b>146</b>

Table 4.2 – Parking requirements in accordance with WBC’s Parking Guidance

Traffic impacts

8.65 A traffic impact assessment was carried out from the outset, using TRICs data to quantify the expected traffic impact of the proposal. The CHA accepted at pre app stage that the parameters which were used to calculate the trip rates and anticipated trip generation were satisfactory. The assessment yielded trip rates of 33 trips during the AM peak period and 36 trips during the PM peak period, with 308 movements expected across the day. The CHA considered that the proposed development’s anticipated traffic generation did not warrant further detailed modelling to be undertaken.

8.66 The CHA noted that the proposed development's expected traffic generation would be far in excess of both the existing use, and the previous proposals under application ref. WA/2018/1636, therefore it is critical that access and highway improvements as detailed at pre app stage are incorporated and acted on to ensure that safe and suitable access to the site for all can be achieved, as well as access to Cranleigh and the local public transport network.

Electric charging and bicycle storage and charging

8.67 Each of the proposed dwellings and at least half of any visitor parking spaces within the site will be provided with a fast-charge Electric Vehicle charging point (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply), as per the requirements of Building Regs Part S, and SCC's Parking Standards (2024).

8.68 High quality, secure, and covered storage for the parking of cycles will be provided within the site, with a minimum of 1 space per dwelling. Cycle parking will also feature three-pin sockets with timers to facilitate the charging of e-bikes.

8.69 It is worth repeating the conclusions of the Transport Assessment which provides a summary of how the site has been approach and considered from a transport perspective

- The site is located in a location where local services and facilities are available within a convenient walk/cycle distance of the site, offering the potential for development that will reduce the need to travel by private car;
- The developed site will be accessed via the existing access to Guildford Road which will be subject to a number of modifications;
- The modified site access accommodates appropriate geometry and an appropriate level of visibility (splays) having regard to relevant design standards;
- Pedestrian and cycle access to and from the site will be accommodated via the main site access (from Guildford Road) and directly from the Downs Link;
- Further pedestrian access to the site can be gained via Footpath 355 (public right of way), which passes through the southern section of the site;
- The site layout has been developed to incorporate a high degree of pedestrian and cycle permeability;
- The development of the site offers the potential to create a sustainable residential development that will benefit from having direct access to the Downs Link, which provides a highly attractive 'traffic free' pedestrian and cycle link to/from Cranleigh village;
- The development proposals are provided with an appropriate vehicular, cycle and pedestrian access strategy;
- Car parking is provided in excess of the expected standards set out within Waverley Borough Council's Parking Guidelines; TS02 – TRANSPORT STATEMENT 16087WA Ruffold Farm, Cranleigh
- Electric vehicle charging points will be provided in accordance with standards that are set out within Surrey County Council's Vehicular, Cycle and Electric Vehicle Parking Guidance;

- Secure cycle parking will be provided in accordance with Waverley Borough Council's Parking Guidelines;
- Refuse collection will take place from within the site and all refuse collection can be carried out in compliance with the maximum refuse carry distances set out within the Department for Transport's 'Manual for Streets';
- The development proposals are provided with an appropriate servicing strategy;
- The development proposals will deliver a package of highway mitigation measures that focus on delivering improved pedestrian connectivity and infrastructure, and enhanced passenger transport (bus) infrastructure; and
- The vehicular transport implications associated with the development proposals can be satisfactorily accommodated and that the traffic impacts associated with the development of the site will not prejudice the free flow of traffic or condition of road safety within the neighbouring highway.

8.70 On the basis of the assessment carried out it is clear that the proposals can be accommodated without detriment to the operation of the local highway network, and accords with the guiding principles of the NPPF as well as relevant transport policy.

### **Affordable housing and housing mix**

8.71 Policy AHN1 of the Local Plan (Part 1) 2018 states that the Council will require a minimum provision of 30% affordable housing on all housing development sites which meet the stated criteria. This scheme is promoting a policy compliant scheme of affordable units. The application is promoting 30% affordable units which equates to 21 units of the overall 70 house scheme.

8.72 Policy AHN3 sets out that proposals will be required to make provision for an appropriate range of different types and sizes of housing to meet the needs of the community, reflecting the most up to date evidence in the West Surrey Strategic Housing Market Assessment (SHMA). The supporting text and justification states that the policy for a mix of homes should be able to react to changing circumstances and ensure that it contributes to the mix of both the wider area as well as the development site itself. The schedule of accommodation and breakdown proposed is as follows

<b>Number of beds</b>	<b>Number of units</b>	<b>Percentage of overall scheme</b>
1 Bed	12 units	17%
2 Bed	22 units	31.4%
3 Bed	24 units	34.3 %
4-5 Bed	12 units	17%

8.73 This breaks down to the following areas per unit type

<b>Number of beds</b>	<b>Area per unit type</b>
1 Bed	37.5 sq metres (footprint)
2 Bed	53.5 q metres (footprint)
3 Bed	58.9 q metres (footprint)
4 Bed	93.3 sq metres (footprint)
5 Bed	108 sq metres (footprint)

8.74 The proposal is policy compliant in this regard.

## **Living environment**

- 8.75 Paragraphs 131 and 135 (f) of the NPPF states that planning policies and decisions should ensure that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and futures users
- 8.76 Policy TD1 of the Local Plan (Part 1) 2018 seeks to maximise the opportunity to improve the quality of life, health and well-being of current and future residents through the provision of appropriate private, communal and public amenity space, appropriate internal space standards for new dwellings, on site play space provision, appropriate facilities for the storage of waste and private clothes drying facilities.
- 8.77 Policy DM5 of the Local Plan (Part 2) 2023 sets out that all development should demonstrate that they provide adequate internal and external space in order to ensure an appropriate living environment for future occupiers and meeting the Nationally Described Space Standard is a minimum requirement. In addition, external space should be provided; where an area of private garden is proposed for the exclusive use of a dwelling house, this should be at least 10m in depth and the width of the dwelling. This latter aspect has been complied with in the masterplan layout.
- 8.78 As this is an outline planning application with only the principle and access being considered the details of the houses proposed and floor layouts and sizes are not currently known. There is though every intention to comply with the national space standards.

## Impact on neighbouring dwellings

8.79 Chapter 12 of the NPPF entitled “ Achieving well designed and beautiful places” sets out in paragraph 135 (f) that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users [52](#) ; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

8.80 Policy DM5 of the Local Plan part 2 addresses ‘safeguarding amenity’ and sets out a series of requirements, there being two main ones with 5 sub sections that address

- Meet as a minimum the nationally described space standards
- Provide an area of external amenity space for each dwelling
- Where communal amenity space is provided instead of private gardens, 20 square metres per dwelling should normally be provided
- Private balconies should have a depth of 1.5m and width of 2m (minimum)
- An areas of private garden should have a depth of 10 metres and at least the width of the dwelling

8.81 In the 2018 officer report for 20 dwellings the officer correctly identified that only one house could be directly impacted by the development and that was Ruffold Lodge, which is located immediately adjacent to the access road leading to Ruffold Farm. This is circled red on the aerial photograph below.



8.82 The officer noted in the relevant section of the report:-

*“The primary elevation of this dwelling is its southern elevation, which fronts directly onto the access road into the site with the front door of the dwelling opening directly onto the access road. The ground floor windows within the southern elevation are into primary living accommodation including the kitchen, living room and a bedroom. Furthermore the garden for this dwelling lies to the west of the site and is separated from the access by a low fence which provides limited, if any, screening from external views. “*

8.83 Whilst these concerns and reason for refusal were noted; there are several mitigating factors, which are

- The applicant owns the land, Ruffold Farm and Ruffold Lodge, as well as the land the subject of this application.
- The new access way into the proposed development is further west of Ruffold Lodge when compared to the 2018 refusal, which was directly opposite the lodge building
- Ruffold Lodge has been included within the red line application site boundary and therefore we are happy to consider its future use with the housing development, should there remain concern as to its residential use, as currently shown.

8.84 As part of this proposal we are happy to incorporate any measures deemed necessary by the Council to overcome any concerns as to impacts on Ruffold Lodge. However and ultimately both the land (subject of this application) and Ruffold Farm and Ruffold Lodge are within the control of the same owner.

### **Trees**

8.85 Paragraph 187 (b) of the NPPF recognises “the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem

services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”

- 8.86 A comprehensive tree survey was carried out by Arbtech over two days on 5 and 6 September. A total of 47 No. individual trees, and 07 No. groups of trees and 05No. hedges were surveyed as part of this exercise.
- 8.87 As part of the process it was identified that 6No individual trees and 3No groups of trees will require removal as part of this proposed scheme.

Table 5: Number of individual trees to be removed			
U	A	B	C
1	0	1	4

Table 6: Number of groups to be removed			
U	A	B	C
1(0)	0(0)	0(1)	2(1)

() = partial removal of a group

- 8.88 The Executive summary of the Arbtech report concludes that the overall quality and longevity of the amenity contribution provided for by the trees and groups of trees within and adjacent to the site will not be adversely affected as a result of the local planning authority consenting to the proposed development. It is considered that any issues raised in this report, or beyond the scope of it, can be dealt with by planning conditions.

## Ecology

- 8.89 Chapter 15 of the NPPF sets out the Government's planning policy with regard to the natural environment. Paragraph 187 of the NPPF states that 'planning policies and decisions should contribute to and enhance the natural and local environment by...' (inter alia):
- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
  -

minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; · preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

- 8.90 Paragraph 193 advises on the principles that should be applied when determining applications.
- 8.91 Paragraph 194 “The following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation; b) listed or proposed Ramsar sites; and c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites”.
- 8.92 The following local plan policies are considered also relevant
- Policy NE1 Biodiversity and Geological Conservation
  - NE2 Green Blue Infrastructure
  - NE3 Thames Basin Heaths Special Protection Area
- 8.93 A Preliminary Ecological Baseline Assessment was carried out on 17 June 2024 and was published in September 2024 and updated in January and March 2025. The assessment identified key ecological constraints associated with the proposed development and input into the scheme design to minimise ecological impacts where possible. It also set out what is required to be complied with in respect of conservation legislation and identified further survey work to be undertaken.

8.94 The survey work required included the following:-

- Great Crested Newt and laboratory analysis
- Badgers survey
- Bat transect survey
- Botany report
- Reptile surveys
- Bat PRA report
- Dormice survey
- Breeding bird surveys

8.95 This work has been ongoing since early summer 2024 and as part of this submission we are able to provide the badger report and bat PRA. Newts, reptiles and dormice and breeding bird surveys are under way from last year but need to be completed in early June 25. The reports when received will be shared with the Council in order to complete the ecology data.

8.96 The main conclusions from the PEA was as follows:

- Three non-designated sites for nature conservation were recorded within 2 km of the Site.
- Priority Habitat Deciduous Woodland and Priority Habitat and Irreplaceable Habitat Wood-pasture and Parkland, were recorded on and adjacent to the Site
- The Irreplaceable Habitats (veteran trees, and wood-pasture and parkland) must be retained on Site as a priority. Other higher value habitats including priority deciduous woodland, mixed scrub and other neutral grassland should also be retained as much as possible to minimise BNG loss and retain habitat connectivity.

8.97 Upon completion of all the survey work an 'Ecological Impact Assessment' report will be prepared which will identify any necessary mitigation measures.

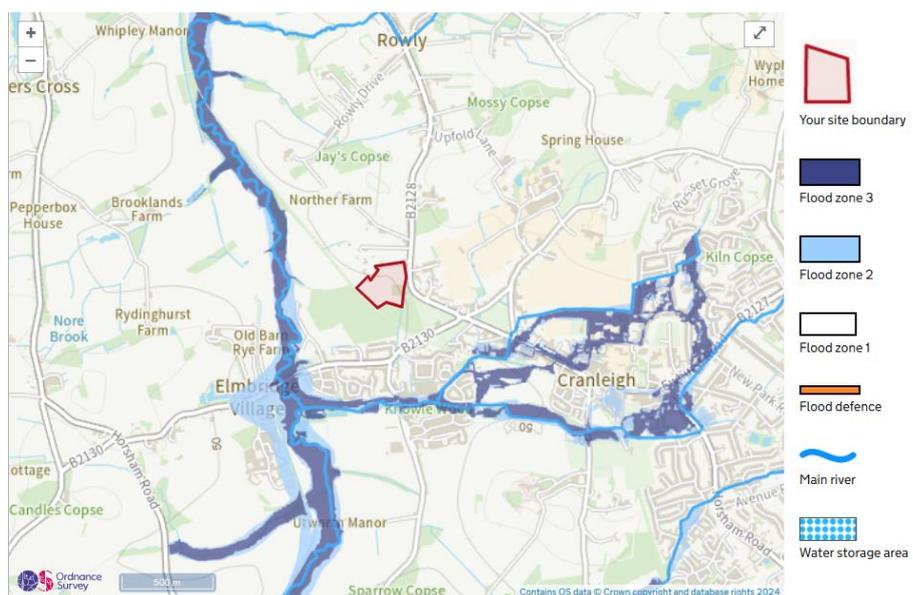
## Biodiversity

8.98 Within Section 98 of the Environment Act 2021, there is provision for achieving a 10% Biodiversity Net Gain (BNG) within a development, with the particulars being covered under Schedule 14 of the Act. Paragraph 193 of the NPPF sets out the principles that should be applied to habitats and biodiversity.

8.99 The applicant is committed to providing the necessary 10% gain and the Statutory Biodiversity Metric has been completed to demonstrate at least 10% BNG either within the Site or within land in control of the applicant or via an offsetting provider once adoption of the Biodiversity Mitigation Hierarchy has been demonstrated. The initial review has shown that the BNG target has not been achieved with the current design plans so alternatives will likely be considered at the detailed design stage, including the option for off-site compensation or the purchase of statutory credits to achieve 10% BNG

## Drainage and flood risk

8.100 The application site is within flood zone one and therefore not at risk from fluvial flooding.



- 8.101 Policy CC1 of the LPP1 seeks to support development which contributes to mitigating and adapting to the impacts of climate change, including measures that provide appropriate flood storage capacity and address issues of flood risk through the application of Policy CC4, which requires sustainable drainage systems (SuDS) for major developments. A site-specific Flood Risk Assessment will be required for sites within or adjacent to areas at risk of surface water flooding as identified in the SFRA. There should be no increase in either the volume or rate of surface water run-off leaving the site. There should be no property or highway flooding, off site, for up to the 1 in 100 year storm return period, including an allowance for climate change. Policy FNP1 of the FNP seeks to ensure, amongst other things, that development is not at an unacceptable level of flooding itself and will not result in any increased risk of flooding elsewhere, and will not result in unacceptable levels of water pollution.
- 8.102 As there are two sources of flood risk – Local watercourse and surface water runoff – it is necessary to determine flood water levels at the site for the desired return periods emanating from these sources. Consideration has also been given to the site flooding from ponding and overland flow within the site.
- 8.103 A Strategic Flood Risk assessment was carried out by Capita Symonds in 2010 which was district wide and has been used and incorporated into the flood risk advice received by the appointed consultant (EWE Associates limited).
- 8.104 The Littlemead Brook is to the south of the site and the Environment Agency flood data shows a low risk from this watercourse. It should be noted that due to being flood zone 1 and using the flood risk vulnerability and flood zone compatibility table no exception test was necessary.

- 8.105 The total site is currently considered 100% permeable. The residential development (following completion) will be increased to 29% of the total site area which is approximately 1.34 hectares.
- 8.106 Importantly and in respect of past flooding the Flood Risk report says “A search on the British Hydrological Society Chronology of British Hydrological Events website<sup>1</sup> found no record of past flooding within the area close to the proposed development site.”
- 8.107 A local watercourse located directly adjacent to the south east corner of the site The watercourse at the downstream end of the site is approximately 1.2m deep with a bed width of 0.5m and a bank top width of 5m. The local watercourse appears to have a small catchment area limited to the adjacent highway and the agricultural areas directly adjacent.
- 8.108 The surface water plans provided by the Environment Agency consider that the local watercourse is low risk to the site as there is no indication of the site being flooded from the watercourse and therefore a low risk to the site. It is proposed to ultimately discharge any surface water flows generated by the development of the site which cannot drain via infiltration to existing local watercourse located to the south east of the site which eventually flows into the Littlemead Brook to the north
- 8.109 The drainage strategy will include
- 16 pipes to represent the proposed system
  - 1 hydro-brake (25.8l/s peak)
  - 1 pond
  - 1 outfall into the existing local watercourse with no surcharging

8.110 Sustainable urban drainage will be provided by a single large attenuation pond

8.111 Turning to mitigation measures, the FRA recommends the internal ground floor of any residential buildings proposed for construction within the site are elevated at least 300mm above the 1 in 100 year plus climate change pond level of 50.161mOD, hence a level of 50.461mOD. It is further recommended that the internal ground floor of any residential buildings proposed for construction within the site are elevated at least 150mm above the adjacent finished external ground level to mitigate against any localised flooding resulting from surface water run-off.

#### **Loss of any agricultural land**

8.112 In the 2018 application the case officer was concerned that the application did not contain any details pertaining to the operation of Ruffold Farm other than to state that the land had been left fallow.

8.113 There was concern as to the agricultural classification of the land. It was considered there was insufficient information to adequately address the point and therefore it was considered contrary to a 2002 local plan policy that is no longer save or relevant. Reason 2 of the decision notice stated  
*“Insufficient information has been submitted detailing the Agricultural Land Classification of the land, therefore it has not been demonstrated that the proposal would not result in the loss of the best and most versatile land, contrary to retained Policy RD9 of the Local Plan 2002.”*

8.114 The relevant policy context now is paragraph 187(b) of the December 2024 NPPF. This says:-

(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

8.115 Policy DM15 of the Local Plan (Part 2) states that development should recognise the benefits of areas of best and most versatile agricultural land. Where it can be demonstrated that significant development of agricultural land is necessary, areas of poorer quality should be preferred to those of higher quality.

8.116 Reading Agricultural Consultants were instructed to assess the land and the proposal and these following findings are taken for their report which was published in August 2024.

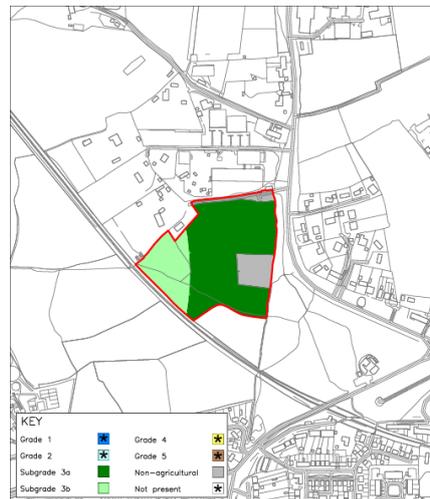
- The report noted that the land a warm and moderately wet climate and moderately large crop moisture deficits. The number of Field Capacity Days (FCD) is larger than is average for lowland England (150) and is unfavourable for providing opportunities for agricultural field work
- The bedrock geology for the site is the Weald Clay Formation. This formation comprises dark grey, thinly bedded mudstones and mudstones with subordinate siltstones, fine to medium grained sandstones, limestones and clay ironstones
- slowly permeable, fine silty over clayey, fine loamy over clayey and clayey soils. Profiles are typically assessed as poorly drained in Wetness Class
- Five soil profiles were examined using an auger and one topsoil sample sent to the laboratory for testing
- Agricultural land quality at the site is limited by soil wetness to either Subgrade 3a or 3b. There is one soil type present.

8.117 The findings were as follows

**Table 2: ALC areas**

Grade	Description	Area (ha)	%
Subgrade 3a	Good quality	3.2	67
Subgrade 3b	Moderate quality	1.0	21
Non-Agricultural		0.6	12
Total		4.8	100

8.118 Diagrammatically the split between subgrade 3a and subgrade 3b is as follows. It should be noted that the grey areas on the drawing indicate groups of trees.



8.119 The land that forms this application is not part of any agricultural holding, and no agricultural activities have taken place on the land for many, many years. Over many years now the land has simply been cut for hay, once and sometimes twice yearly.

### **Air Quality**

8.120 Air quality and climate change are closely interrelated with many common air pollutants. It is noted that Waverley BC additionally in March 2021 a Clean Air Strategy for Waverley was adopted. It aims to reduce nitrogen dioxide and fine particulate levels across the borough. Importantly the land at Ruffold Farm is not subject to any 'air quality' special measures.

### **Sustainability and renewable energy**

8.121` Paragraph 161 of the National Planning Policy Framework (Dec 2024)

*“The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”*

8.122 Achieve Green have prepared an Energy and Sustainability report to support this submission. The development will seek to achieve a target CO2 reduction of 75% relative to the Building Regulations 20132 (equivalent to a target CO2 reduction of 44% relative to the Building Regulations 2021), through the application of the energy hierarchy.

8.123 It is worth listing the main considerations from the Executive Summary. These are:-

- These combined energy efficiency measures lead to a projected reduction in CO2 emissions equivalent to 20% of the base case.
- This development will seek to achieve a reduction in CO2 emissions equivalent to 45% of the baseline through the installation of air source heat pumps and photovoltaic arrays.
- The total projected reduction in emissions resulting from energy efficiency measures and the installation of renewable technology is 65% compared to the regulated emissions from a building designed to just meet Building Regulations (2021) Part L1

8.124 The key energy efficient design features are as follows:

- Low U-values, including triple glazing.
- Airtight construction.
- Mechanical ventilation with heat recovery.
- Heating and Domestic Hot Water via heat pump system.
- Solar photovoltaic installation.

8.125 From the figures set out above we consider that we will exceed the expected target of the Future Homes Standard when this comes into effect in 2025.

## Utilities

8.126 We have undertaken an initial look at existing and proposed utilities for the land at Ruffold Farm. A short report has been prepared in conjunction with the application submission and the main pointers are as follows:-

- There is no gas connection to the land and there is no intention to provide one in the future
- Electricity will be the source for heating and hot water. The distribution network provider is UK Power Networks
- Both supply and removal of waste water is provided by Thames Water. By way of a Pre application letter in December it was established that there would be sufficient capacity for up to 70 houses.
- Surface water within the subject site will be self-managed and discharged by pumping to the nearby watercourse

8.127 We are confident that we are well placed to provide the necessary utilities and infrastructure to support this development of 70 units.

### **Waste and recycling**

8.128 Policy TD1 (section 5) of the Local plan part one is the relevant policy and requires new development to be of a high quality and inclusive design and to maximise opportunities to improve the quality of life and health and well-being of future residents. This includes appropriate facilities for the storage of waste (including general refuse, garden, food and recycling).

8.129 The 22 unit apartment block closest to the entrance to the development contains a dedicated bin and bike store. The remaining individual 48 houses allow for bin storage within the curtilage for each residential property. These measures accord with the aforementioned policy.

### **Section 106 legal agreement**

8.130 Policy ICS1 of the Local Plan (part 1) 2018 states that infrastructure considered necessary to support new development must be provided either on- or off-site or by the payment of contributions through planning obligations and/or Community Infrastructure Levy.

8.131 The three tests as set out in Regulation 122(2) require s106 agreements to be: (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and, (c) fairly and reasonably related in scale and kind to the development. If all other aspects of the application were deemed to be acceptable, then the following contributions to be secured by way of a s106 agreement.

8.132 Clearly should the application be found to be acceptable in principle then we will need to agree heads of terms. These are likely to be as follows:-

- Affordable housing 30%
- Deliver the play areas, open space and SuDS and a management plan in relation to their future management
- Education contributions

- Highway improvements – pedestrian connectivity (uncontrolled crossing with tactile paving, new footway construction and widening of footways, plus bus stop improvements)
- Contributions towards a car club

8.133 Paragraphs 56 to 59 of the NPPF (December 2024) addresses the use of planning conditions and section 106 legal obligations. All of the above obligations are considered necessary, directly related to the development and fairly related in scale and kind and therefore comply with the necessary regulations as set out in the relevant paragraphs of the NPPF.

## 9 The Planning Balance

9.1 The starting point is that the Council cannot demonstrate a 5 year supply of housing. In published committee reports it refers to just over 1 years supply.

9.2 Paragraph 11 of the Framework states that planning permission should be granted unless, (i) policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusal or, (ii) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

9.3 As referred to earlier in this statement and reiterating the quote from a council spokesperson the Council now finds itself in a “perpetual tilted balance”

9.4 This significant shortfall means that the presumption in favour of sustainable development set out in paragraph 11 d) of the Framework, as set out above is engaged. This is often referred to the tilted balance.

9.5 Further the Waverley Development Plan is out of date and there is no indication of a new local plan emerging in the foreseeable future. It is acknowledged that the Cranleigh Neighbourhood Plan is in date.

9.6 Turning to the identified harms.

- The site is outside the identified settlement area for Cranleigh
- It is not an allocated site.
- There will be some impact on the local landscape and urbanising effects on the immediate area.

9.7 These harms attract moderate weight.

9.8 The benefits of the scheme are as follows:-

- The provision of 70 houses; 30% of which will be affordable units which would offer a meaningful choice of house sizes and tenures to future households
- A range of highways infrastructure improvements proposed that would make the site access safe but also optimise the site in sustainability terms to help reduce the future reliance by residents on private vehicles.
- The site is well-located for local services and employment opportunities and would allow residents to access them without reliance on a private car
- Areas of open space and play space and link to the Downs Link
- Economic benefits through the construction phase

9.9 We consider substantial weight should be given to the valuable contribution of up to 70 dwellings that the scheme would make to the housing supply relative to Waverleys significant shortfall.

9.10 The adverse impacts would not significantly and demonstrably outweigh the aforementioned benefits. Accordingly, the presumption in favour of sustainable development forms a consideration of such materiality that it indicates that planning permission should be granted notwithstanding any conflict with the development plan.

## **10 SUMMARY AND CONCLUSIONS**

- 10.1 Nationwide there is an undeniable housing shortage crisis. At the local level Waverley Borough Council have consistently failed to provide for a five year supply of housing. Over the last 12 months this figure has decreased to just over 1 year supply and possibly lower still. This figure is significant, considerable and serious and because of this the tilted balance is clearly engaged.
- 10.2 It should also be noted that it is not just market homes that are required. Affordable homes are required as well. There is a serious shortfall in the borough for affordable homes. 21 affordable homes would be secured with this scheme.
- 10.3 Waverley Borough Councils local plan is out of date as are the most important policies. Whilst the evidence gathering for a new local plan is underway it is common knowledge at the earliest the new plan would be adopted is 2027, some three years away and that is without any hitches or show stoppers.
- 10.4 The land the subject of this application is not constrained in that the majority of the site is countryside beyond the Green Belt. Only the access way is in Green Belt. It is not within the Surrey Hills National Landscape or an Area of Great Landscape Value (AGLV). It is also not within or close to a Conservation Area. It is also within flood zone 1, where there is a low probability of flooding. The land is though very close to the Cranleigh settlement area, and very close to local service and amenities.

- 10.5 Importantly officers in respect of the earlier 2018 application (WA/2018/1636) made it clear that they were satisfied that the proposal would not represent isolated development in the countryside. Further when they assessed the access point and any harm to the green belt they concluded the proposed access point would not be inappropriate development in the green belt. On both these points it is considered the same applies here albeit for a larger site area and larger number of houses.
- 10.6 As the site is adjacent to the built-up urban area boundary and has existing development adjoining its boundaries, it is considered that new development would have a minimal impact upon the open countryside, and would make a logical extension to the Cranleigh settlement area and provide for much needed market and affordable housing. The land is also deliverable immediately which will greatly assist meeting the Boroughs housing need.