



Our Ref: A093418

Your Ref:

Date: 11.02.16

F.A.O. Jo Dawes
Planning
Waverley Borough Council
The Burys
Godalming
Surrey
GU7 1HR

Email: joy.maccoughlan@wyg.com

Dear Jo Dawes,

Re: Cranleigh Church of England Primary School, Cranleigh, Surrey

Town and Country Planning (Environmental Impact Assessment) Regulations 2011, as amended by the
Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015
European Directive 2011/92/EU to be amended by Directive 2014/52/EU

Environmental Impact Assessment – Request for a ‘Screening opinion’

Further to our pre-application discussions on 16.12.15, on behalf of our Client Surrey County Council, please find the submission of information seeking a formal ‘screening opinion’ under the above Directives and Regulations to confirm that an environmental statement would not be needed to accompany the forthcoming outline planning application (access and layout to be considered) for the proposed residential redevelopment of the current Cranleigh C of E Primary School (Infant and Junior School currently on separate sites at Parsonage Road and Church Lane) and the site occupied by Mulberry Living, Bloggs Way.

We attach the following information regarding the current scheme, revised further to our pre-application discussions on 16.12.15, for your consideration:

- Site location plan
- Site layout plan and schedule of accommodation
- Contextual section drawings showing perspectives across street frontage and parts of the site
- Figure 1 – C01A Cumulative impacts plan

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- Appendix A – Details of residential applications submitted within a 2 kilometre radius of Cranleigh since 2012
- This planning letter

As you already know, although the finer details of the proposed development are currently being worked on, it is however considered that the scheme has now reached a stage whereby the Council can assess and deliver a robust screening opinion. Moreover, as the scheme is further developed it is highly unlikely that the proposal will increase beyond the scale and quantum outlined under this submission.

The Proposed Development

The Site: Land at Cranleigh C of E Primary School (at Parsonage Road and Church Lane) and Mulberry Living, Bloggs Way - Cranleigh, Surrey

Site Area: 2.484 ha in total

Existing Uses: The land currently comprises three land parcels with two used for education and one for siting of portakabin (currently let to Mulberry Living Ltd - private community healthcare company - as centre and ancillary offices). Site 'A' comprises the current Junior School on Parsonage Way together with the portakabin at Mulberry Living accessed via Bloggs Way. Site 'B' comprises the current Infant School accessed from Church Lane.

Proposed Development: In summary, the development will comprise the erection of 98 dwellings with 220 car parking/garaging spaces and open amenity space of up to 6,666 m² in total and gardens of up to 6,878 m². The proposed dwellings will comprise a mix of 1&2 bedroom apartments, 2, 3 and 4 bedroom houses. (see schedule of accommodation) Site 'A' will accommodate c 78 dwellings and Site 'B' c 20 dwellings. The proposal will provide c 31 affordable housing units. Site 'B' will be accessed via Parsonage Road with Bloggs Way closed to vehicular traffic but with pedestrian link maintained together with a direct existing pedestrian link to the High Street being opened up. The proposal will include the opening up of an existing vehicular access on Dewlands Lane and closure of Church Lane to vehicular traffic with pedestrian link retained at Site 'B'.



Requirement for Environmental Impact Assessment

The aim of Environmental Impact Assessment (EIA) is to ensure that when deciding whether to grant planning permission which is likely to have significant effects on the environment, local planning authorities do so in the full knowledge of the likely significant effects upon the environment.

However, EIA only applies to certain types of projects which are likely to have significant impact upon the environment. Following the procedure set out by the 2011 Regulation's and as reinforced by the guidance of the NPPG (Paragraph: 07 Reference ID: 4-017-20140306 onwards), in this instance we believe it is not necessary for an EIA to be undertaken as explained in more detail below.

The development is clearly not Schedule 1 development and the site is not located within a 'sensitive location', as defined by the 2011 Regulations. ('Sensitive' locations are those that fall within a Site of Special Scientific Interest, European sites, National Parks, the Broads and Areas of Outstanding Natural Beauty, World Heritage Sites, scheduled monuments).

It does however fall within **item 10(b) 'Urban development Projects' of Schedule 2**, the meaning of which has been held to include residential development. The site area and number of units proposed exceeds that set out in column 2 Schedule 2 of the 2011 EIA Regulations. However, **neither the site area nor number of proposed units exceeds the threshold criteria in column 2 Schedule 2, as revised under the 2015 EIA Amendment Regulations with this part being brought into force in April 2015**, being less than 150 houses and less than 5 hectares.

The NPPG makes clear at **Paragraph: 018 Reference ID: 4-018-20140306** that when screening Schedule 2 projects, the local planning authority must take account of the selection criteria in Schedule 3 of the Regulations and ultimately only a very small proportion of Schedule 2 development will require an assessment. Not all of the criteria will be relevant in every case and



each case should be considered on its own merits in a balanced way with regard to whether a project is likely to have significant environmental effects. The NPPG provides a tabulated set of indicative thresholds and criteria and an indication of the types of impact that are most likely to be significant for particular types of development which should also be considered.

Accordingly, it is necessary to take into account the relevant selection criteria set out in Schedule 3 to determine if EIA is required. The selection criteria for screening Schedule 2 developments fall under three headings – Characteristics of development; Location of development; and Characteristics of the potential development.

Characteristics of the Development

Schedule 3 refers to:

- a) the size of the development,
- b) cumulation with other developments,
- c) use of natural resources,
- d) the production of waste,
- e) pollution and nuisances, and
- f) the risk of accidents, having regard in particular to substances or technologies used.

Having regard to the proposed development, it is considered that the size of the development and cumulation with other developments is the most significant of these criteria in this instance.

a) The size of the development

The comparative breakdown of existing hardstanding, built footprint, open space against the proposed hardstanding, built footprint, open space and gardens are set out below:

<i>Existing</i>		<i>Proposed</i>	
Hardstanding	1.0097ha	Hardstanding	0.6225 ha
Built form footprint	0.3959ha	Built form footprint	0.5077 ha
Open space	1.0791ha	Open space	0.6666 ha
		Gardens	0.6878 ha

The existing total floor area on the 2.48 ha sites comprise 4,810 sq m and proposed total floor area of 8,638 sq m. The proposed development would provide a large increase in floor space on account of an increase in first and second floor accommodation with a slightly larger footprint



overall but it would achieve a reduction in the building/hardstanding to open space ratio, in the form of a large number of smaller individual buildings spread across the sites with gardens in contrast to the large amalgamated mass of the existing school buildings and hard playground areas. At the same time a core open space area with play experiences would be proposed for each of Sites 'A' and 'B', linking to other areas of open space on the sites. The sites, in particular the Junior School site, with existing low level of current built form given their urban context, represent an opportunity for more efficient urban renewal.

In the wider context, the land is located centrally and sustainably well within the identified settlement area of Cranleigh, surrounded by existing development. Site 'A' falls partly within and partly immediately adjacent to the 'town centre' area identified in the Waverley Borough Local Plan 2002 which has a built-up character containing a mix of retail, offices and residential development to the south. Both Sites 'A' and 'B' are also each bounded to the east and west by significant areas of residential development also falling within the settlement boundary, as well as other mixed uses. To the north of Site 'A' stands a secondary education facility with extensive grounds and to the north of Site 'B' lie residential estates the Cranleigh cemetery.

Bearing in mind the existing site usage and urban context and surroundings the proposed development will introduce only a moderate increase in floorspace and it is therefore highly unlikely that it will generate significant impacts either in isolation or cumulatively. Trips generated in relation to the re:provided school use will alter little as the Primary school is to be re-provided a short distance away also on Parsonage Road. Home to State School trips generated by the pupil yield of the new housing would be likely to be undertaken on foot bearing in mind such close proximity to both Primary and Secondary schools. The TA shows that there will be a net decrease in trips generated from the sites.

With regard to building height, the proposals include some flatted accommodation of three storeys along the central part of the Parsonage Road frontage and within the centre of the Junior School site; some second floor accommodation is proposed within the roofspace of some town houses within the site. This increase in height will likely be discernible locally but will be absorbed into the locality as other buildings within the surroundings are also of three storeys in height or comprise large institutional buildings, bearing in mind also the width and depth of the land. The



visual and townscape impact of the proposed development in relation to the surroundings and to the heritage value of the immediate surroundings needs to be assessed in technical documentation to accompany the application. However this is a matter relevant to the determination of the planning application and is not of such significance that it should fall to be considered under an EIA.

b) Cumulative impact

The EIA Regulations require consideration of the cumulative impact of proposed developments. We set out below our approach to the cumulative assessment of residential schemes within the locality.

Methodology

Our methodology has been to review significant proposals containing residential development submitted to Waverley Borough Council over the last 4 years. We have defined significant proposals as those with more than 50 dwellings. Having discussed the search area with officers at Waverley Borough Council and bearing in mind the central sustainable urban location of our Client's proposals, the appropriate search area identified in this instance is a 2 kilometre radius of the settlement area of Cranleigh. We attach at Figure 1 the 2 kilometre radius applied. We attach at Appendix A the list of development proposals that fall within the 2 kilometre radius over the 4 year period.

At the current time the six known schemes, amounting to 1138 dwellings in total (NB some of which may not be implemented should appeals be unsuccessful), comprise the following:

- Two of the six schemes (203 dwellings) within the 2 kilometre area have been approved, one at Swallow Tiles, Bookhurst Road on the eastern side of Cranleigh has been implemented for 58 units; the other for 145 dwellings at Amlets Lane remains unimplemented;
- Two are pending determination (390 dwellings) - 125 dwellings on land at 106 & Chantreys Bungalow & Land to south west of Horsham Road / 265 dwellings on Land at west Cranleigh Nurseries and north of Knowle Park between Knowle Lane and Alfold Road, Cranleigh



- Two have been refused (545 dwellings) – one currently at appeal by P.I. for 425 dwellings at land south of High Street between Alfold Road and Knowle Lane /one for 120 dwellings on land at Hewitts Industrial estate

The combined likely environmental effects and cumulative impact of these schemes are considered likely to revolve around traffic generation (impact on the A281), noise, air quality, visual/landscape and flooding/drainage which we have considered within this letter.

Transport

Transport will be the subject of detailed assessment in technical documentation to accompany each planning application. In the Cranleigh Schools case the Transport Assessment prepared by Motion concludes that the proposals will lead to an overall net decrease in vehicular trips and will therefore not lead to any adverse impact upon the transport network locally, in contrast there will be a net benefit in relation to this development which would be an asset when reviewing cumulative impact of current proposals as a whole. It is therefore considered that our Client's scheme will not therefore add to the cumulative impact in transportation terms.

Visual/landscape impact

The majority of the six schemes fall on open countryside outside the Cranleigh settlement boundary in contrast to our Client's proposal. In contrast our Client's residential redevelopment proposals would not add either individually or cumulatively to the impact upon the open countryside landscape around Cranleigh. The only current scheme within the Cranleigh settlement boundary is not contiguous with our Client's land. There would be no visual relationship or cumulative landscape impact with any of the other schemes sufficient to generate significant environmental impact in this respect.

Noise/Air Quality

As there is net decrease in vehicle movements from our Client's scheme, and given the residential nature of the proposals, it is considered that the development will not lead to significant post-construction noise and air quality effects as an individual site such as that its cumulative contribution would be minimal. The application site does not lie within an AQMA (<http://uk-air.defra.gov.uk/aqma/>January 2015). EPUK air quality assessment guidance states that



assessment may be required for; 'Proposals that would significantly increase the number of HGVs by say 200 movements or more per day'. It is not envisaged that the proposed development will generate 200 HGV movements per day. The perception of sound level is subjective, but as a general guide a 10dB(A) increase can be taken to represent a doubling of loudness, whilst a change in the order of 3dB(A) is generally considered to be just perceptible. Guidelines for the Environmental Assessment of Road Traffic (1993) state that: *'Typically, a halving or doubling of flow produces a 3dB(A) change in noise level'. A reduction in traffic flows is anticipated from the Cranleigh Schools proposals which would be a net benefit in cumulative terms, not generating the need for EIA due to likely significant environmental effects.*

There is the potential for construction activities to generate noise and dust emissions, but standard and proven construction methodologies are available to minimise these temporary adverse effects e.g. BS 5228:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites. No significant air quality or noise effects are therefore envisaged.

We are also aware of the Dunsfold Aerodrome application validated on 18.12.15 ref WA/2015/2395 which lies some 5 kilometres to the south-west of Cranleigh and to the west of the A281 running between Guildford and Horsham. The Dunsfold Aerodrome application seeks the following development:

- Part Outline proposal for a new settlement with residential development comprising 1,800 units (Use Class C3).
- 7,500sqm care accommodation (Use Class C2).
- A local centre to comprise retail, financial and professional, cafes/restaurant/takeaway and/or public house up to a total of 2,150sqm (Use Classes A1, A2, A3, A4, A5).
- New business uses including offices, and research and development industry (Use Class B1a and B1b) up to a maximum of 3,700sqm; light and general industry (Use Class B1c and B2) up to a maximum of 7,500sqm; storage and distribution (Use Class B8) up to a maximum of 11,000sqm; a further 9,966sqm of flexible commercial space (B1(b), B21(c), B2 and/or B8).
- Non-residential institutions including health centre, relocation of existing Jigsaw School into new premises and provision of new community centre (Use Class D1) up to a maximum of 9,750sqm.
- A two-form entry Primary School.
- Open space including water bodies, outdoor sports, recreational facilities, canal basin and nature conservation areas.
- Public transport routes, footpaths and cycle ways and landscaping



- Removal of three runways.
- All related infrastructure including roads, car and cycle parking, energy plant and associated equipment, water supply, telecommunications, drainage systems and waste water treatment facilities.
- Part Full application for the demolition of 8,029sqm of existing buildings and the retention of 36,692sqm of existing buildings, for their future use for a specified purpose as defined by the Use Classes as specified in the schedule of buildings and their uses.
- Temporary use of Building 132 for a construction headquarters

The Dunsfold Aerodrome is considered to be a stand-alone scheme in the form of a new settlement with supporting infrastructure in the form of retail and community facilities included as part of the scheme with new highway links. The scale of the application required an ES submission which set out detailed mitigation at section 18.1 where significant impacts were considered likely to arise in relation to ecology and landscape. (see Appendix 2) It also took into account cumulative impact of a number of applications in the vicinity of Dunsfold together with the majority of the applications that we have considered in our 2 kilometre area around Cranleigh. The submitted ES concluded that even for the scale of development proposed at Dunsfold that *'the EIA has shown that, with the proposed mitigation measures in place, many potential negative impacts associated with the construction and operation of the new settlement can be avoided or minimised. A number of positive impacts will also occur.'*

In terms of criteria (c) and (d), use of natural resources and production of waste, the proposal will have no adverse use of natural resources nor produce waste of a nature that would otherwise be expected from an urban development of this nature. With regard to criteria (e), pollution and nuisances, we feel the proposal will not lead to any significant variation in vehicular emissions and noise as set out above.

Finally, the proposal does not involve the use of new technologies or substances that would place the local or wider environment at risk of accident.

Mitigation

The revised Regulations permit proposed mitigation to be taken into account in consideration of impact at EIA screening stage. We have assessed our proposals in the light of the current residential applications under consideration within a 2 kilometre radius of Cranleigh. We find that the likelihood of significant cumulative environmental effects resulting from the contribution of



our Client's proposed development would be negligible. In addition mitigation will be proposed as part of the application submission which will address any minor impacts found in ecological, heritage and other terms.

Location of Development

Schedule 3 states the environmental sensitivity of geographical areas likely to be affected by development must be considered with particular regard to:

- a) existing land use,
- b) relative abundance, quality and regenerative capacity of natural resources in the area, and
- c) absorption capacity of the natural environment
- h) landscapes of historical, cultural or archaeological significance.

a) Land use

The existing and historical land use of the site is that typical for suburban or edge of town centre locations. The proposed development does not seek to introduce uses which would be out of keeping with such a location being residential accommodation in common with surrounding development and entirely in keeping in this context in terms of environmental impact.

b) Regenerative capacity

In terms of regenerative capacity, the development will achieve the regeneration and renewal of the site, which is situated in an established urban area. The development will not have any significant impact upon natural resources or place significant pressure upon the regenerative capacity of natural resources in the area.

c) Absorption capacity of the natural environment

The WYG Engineering FRA and Drainage Report shows that the development will not have any impact upon the flow, capacity or condition of any watercourse; that drainage for the development can be satisfactorily designed without significant adverse impact on the locality; and would not increase the risk of flooding with use of mitigating SUDs techniques as appropriate - all matters which can be addressed within the scope of the determination of a planning application without the need for ES in this instance. The significance of environmental impact is low for a minor scheme even cumulatively taken with the other recent applications in the vicinity as these also propose individual mitigation where appropriate.



With regard to the third criteria, Schedule 3 identifies what may be considered to be environmentally sensitive landscapes. These include: wetlands; coastal zones; mountain and forest areas; nature reserves and parks; areas designated by Member States; areas in which the environmental quality standards laid down in EU legislation have already been exceeded; densely populated areas; and landscapes of historical, cultural or archaeological significance.

Clearly most of these sub-criteria do not apply to the proposed development. The site does not lie within 5km of the Thames Basin Heaths Special Protection Area. The Ecological Report by WYG Ecology indicates that there are no statutory designated sites located within 2km of the sites and the nearest non statutory designated sites are located 1.44 and 1.45 km from the site. The report notes that it is highly unlikely that any of these designated sites would be directly or indirectly adversely affected by the proposals. The likely impacts upon ecology are not of a significance to justify an EIA. The recommendations of the report can be addressed within the planning application submission including the need for a bat licence prior to demolition of the Caretaker's house (confirmed bat roost), and the preparation of a Construction Environmental Management Plan (CEMP) has been recommended to conform to standard practice, together with the provision of ecological enhancements as mitigation.

The land falls outside the Surrey Hills AONB and would not be particularly visible from surroundings within the AONB being located in the heart of built up part of Cranleigh. In terms of the impact upon the existing densely populated area, the development is of a character that is in keeping with the pattern and mix of uses already within the town centre. Although the physical scale of the building will be new it is not considered that it would generate any significant impact in the context of assessing whether the development requires EIA.

h) Landscapes of historical and archaeological importance

Minor parts of both sites 'A' and 'B' fall within an Area of high Archaeological potential and adjoin the Cranleigh Conservation Area and curtilage of Listed Buildings and Locally Listed Buildings. The Heritage Assessment undertaken by Watermans has found that some parts of the sites may not have been disturbed since the medieval period although it is also known that a WWII bomb destroyed the original School at Site 'B'. The report found moderate adverse significance of effect, resulting in an overall impact of slight adverse for these aspects of the site in evidential



terms and minor or slight overall adverse impact in historical, aesthetic and communal terms which it recommended can be mitigated by an archaeological watching brief for any below ground finds and photographic record of above ground buildings of minor archaeological historical interest. The report identifies the historic and communal value of the land to be low and that the proposed Development is not expected to have more than a negligible impact. Issues arising from these designations are not considered to be significant in EIA terms and the matters can be appropriately addressed by means of the submission of a Heritage Statement accompanying the planning application and the adoption of its recommendations by appropriately worded conditions.

Characteristics of the Potential Impact

Schedule 3 requires the potential significant effects of development must be considered having regard to:

- a) the extent of impact (geographical area and size of the affected population),
- b) the transfrontier nature of the impact,
- c) the magnitude and complexity of the impact,
- d) the probability of the impact, and
- e) the duration, frequency and reversibility of the impact.

It is evident that the proposed development, which is an urban development project of a type in keeping with its relatively densely populated urban location adjacent to Cranleigh town centre, is will not have any significant environmental effects which would trigger these criteria.

Conclusion

The conclusions set out in this letter are reinforced by the 'EIA Annex: indicative screening threshold' criteria set out in paragraph 58 (ID: 4-0058-20140306) of the NPPG, wherein it advises EIA is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination. It goes on to state that sites which have not previously been intensively developed are also unlikely to require EIA where the area of the scheme is less than 5 hectares; or it would provide a total of no more than 10,000 m² of new



commercial floorspace; or the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).

This review has worked through the screening process and concluded that:

- The development is of a type described in schedule 2
- The development site is not within a sensitive area
- The development is above the 2011 EIA Regulations applicable threshold and is therefore a schedule 2 development, however it is below the amended threshold brought into effect in April 2015 by the 2015 EIA Directive
- It is clearly below the advisory indicative screening thresholds set out in the NPPG
- The development is not considered likely to have significant environmental effects
- The development is not an EIA development

Taking all of these matters into consideration we do not consider that a formal Environmental Statement is required. We would therefore request, in accordance with Regulation 5(1), that the Council adopt a negative screening opinion accordingly confirming that the proposed development would not be EIA development; and this be provided in writing within 21 days of the date of this letter.

I trust the content of this letter is clear and helpful and look forward to hearing from you shortly. If you require any further information or clarification please contact me.

Yours Sincerely,



Joy MacCoughlan
Associate Director
Planning

For and on behalf of WYG