



Our Ref: A099161/RR

Date: 25 March 2019

Neighbourhood Plan
Cranleigh Parish Council
Council Office
Village Way
Cranleigh
Surrey
GU6 8AF

Dears Sirs

**CRANLEIGH NEIGHBOURHOOD PLAN
PRE-SUBMISSION (REGULATION 14) CONSULTATION VERSION – FEBRUARY 2019
LAND TO THE SOUTH OF AMLETS LANE**

Introduction

We write on behalf of our client, Farmland Cranleigh Ltd, concerning the recently published pre-submission (regulation 14) consultation version of the Cranleigh Neighbourhood Plan (NP). Our representations on the NP relate specifically to our client's site on land south of Amlets Lane and follows previous representations made at the Site Options (Housing) stage of the NP in August 2018.

Location of Development

Policy CRAN1 relates to the location of development and identifies criteria where development proposals outside the settlement boundaries will be permitted.

Policy CRAN1 should be more flexible in accordance with Policy DM12 of the emerging Waverley Local Plan Part 2: Site Allocations and Development Management Policies. Waverley Borough Council's (WBC) view is that a policy approach which sets out specific forms of development which would be encouraged or constrained in the rural areas would be inflexible and unjustified. As such, WBC's preferred policy approach is to set out the criteria which will apply to all development in rural areas to balance facilitating appropriate development with protecting the character and beauty of rural areas.

Accordingly, we suggest that Policy CRAN1 should be more flexible in accordance with emerging Policy DM12. Policy CRAN1 should also recognise a site's proximity to existing built development and identified settlement boundaries to encourage contiguous development where possible.

90 Victoria Street, Bristol, United Kingdom, BS1 6DP
Tel: +44 (0)117 925 4393 Fax: +44 (0)117 925 4239
Email: Website: www.wyg.com

Registered Office:



creative minds safe hands



Housing Strategy

Section 4.1 of the NP identifies that Cranleigh is required to deliver a minimum of 1,700 new dwellings over the Local Plan period to 2032, as set out in the Adopted Local Plan Part 1 Strategic Policies and Sites (February 2018).

Notably, the government published a Housing Delivery Test: 2018 Measurement and Technical Note on 19 February 2019 (attached at **Appendix A** for reference). Under the housing delivery test's criteria, all authorities under 85% of their housing requirement are required to add a 20% buffer to their five-year housing land supply requirement, instead of 5%.

The recently published 2018 measurement identifies that WBC was at 79% of their housing requirement between 2015 and 2018, with a total of 1,575 homes required and only 1,240 homes being delivered within this time period.

Given the foregoing, the NP should take the above into account in future versions of the NP to ensure that the council's updated housing land requirement, based on a 20% buffer, is met.

Site Allocations

Allocations CRAN4 and CRAN5

We have reviewed the three sites allocated for housing in the NP and would make the following comments in respect of the two allocated school sites: St Nicholas Junior School site (CRAN4) and Cranleigh Infant School site (CRAN5), which are allocated for 75 dwellings and 15 dwellings respectively.

We note that in terms of these two site allocations, Surrey County Council wishes to re-provide an improved Primary School in Cranleigh, which currently operates from these two sites. The NP suggests that the new school will be on nearby surplus land within the existing grounds at Glebelands Secondary School.

We would question whether the two allocated school sites are in fact available and deliverable owing to the fact that they are conditional on a new primary school facility being made available on an alternative site.

A regulation 3 application was submitted in 2017 by Surrey County Council for the construction of a two storey building with associated car parking provision, landscaping, all-weather sports pitch and new access road from Parsonage Road to provide a replacement for Cranleigh Primary School (LPA Ref: WA/2017/0696). There were a number of objections to the proposed development by local residents and notably by Cranleigh Parish Council (CPC).

Furthermore, '*serious concerns*' to the proposed development were raised by the Head of Planning Services at WBC '*in relation to the highway safety and parking implications in what is already a restricted area with limited available parking provision*'. Consequently, the application was withdrawn in November 2017.

We note that a further regulation 3 application was submitted by Surrey County Council in December 2018 for the replacement primary school at Glebelands School (LPA Ref: WA/2018/2044). As with the above application, further objections to the proposed development have been submitted by local residents and again by CPC. The response submitted by CPC includes an objection on a number of matters including; the existing site is best placed for an expanded school, highway safety and parking implications; risk of flooding; impact on residential amenity; and loss of school playing fields at



Glebelands School. This objection is somewhat at odds with the aspirations of the emerging NP for the Glebelands School site and primary school sites.

In addition, the Head of Planning Services at WBC again raised an objection identifying '*serious concerns*' in relation to highway safety and parking implications.

Copies of the consultation responses referred to above from CPC and WBC are attached at **Appendix B** for reference.

In addition to the above, the majority of site allocation CRAN4 is within Flood Zone 3 i.e. has a high probability of flooding. Technical guidance to the National Planning Policy Framework identifies that only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses. Residential dwellings are identified as a 'more vulnerable' use. We also note that in the Site Assessment undertaken by Navigus following the 2015 Call for Sites, it was concluded that this site '*has significant flooding issues, which could be exacerbated by development*'. Owing to flooding matters, Navigus concluded that the site has '*significant constraints*'. Accordingly, it can be concluded that the site at St Nicholas Junior School is not suitable as a housing allocation owing to matters relating to flood risk, particularly given that a site within Flood Zone 1 is available, namely our client's site at Amlets Lane.

Given the foregoing, it can be concluded that there is significant doubt as to whether the site at Glebelands can indeed accommodate a replacement Primary School. As such, it is not certain that site allocations CRAN4 and CRAN5 will be available and/or deliverable for housing development as their redevelopment for housing is conditional on a new primary school facility being made available. In addition, the majority of site allocation CRAN4 is within Flood Zone 3 and so is not suitable as a housing allocation when other sites in lower flood risk areas are available.

Accordingly, the NP should allocate alternative sites, such as the site at Amlets Lane, for housing.

Amlets Lane Site

Our client's site at Amlets Lane is available and deliverable in the short term. For ease of reference, we set out below a summary of the suitability of our client's site for housing development and a site location plan is attached at **Appendix C**. The summary below also makes reference to the Site Assessment of the site at Amlets Lane carried out by Navigus following the 2017/18 Call for Sites (attached at **Appendix D** for reference).

The 1.21 ha site at Amlets Lane offers a prime site for meeting housing need in Cranleigh in a location which would not be a major intrusion into the countryside. The site does not fall within the designated Green Belt, the Surrey Hills Area of Outstanding Natural Beauty (AONB) or an Area of Great Landscape Value (AGLV) and is therefore free from any landscape designation constraints itself. The site assessment undertaken by Navigus states that the site '*is surrounded by green fields*' and '*is remote from the village boundary*'. However, this assessment is incorrect. The site adjoins the recent Cala Homes development, which lies to the south and east, and comprises up to 125 dwellings. There are also existing residential dwellings immediately to the west of the site. As such, the site adjoins existing residential development. Moreover, the site adjoins the revised Cranleigh Settlement Boundary as identified in Figure 8 of the NP and the Waverley Local Plan Part 2: Site Allocations and Development Management Policies Preferred Options document which was out for consultation in 2018. Accordingly, the site is not remote from the village boundary but would offer the opportunity for contiguous development with existing built development and the settlement boundary for Cranleigh.

The site is also within easy walking distance of the shops and services available in the centre of Cranleigh, with access via the public footpath which adjoins the eastern boundary of the site. A safe vehicular access to the site can also be provided onto Amlets Lane, by creating a priority T-junction



with the required visibility splays. Notably, access off Amlets Lane for the adjacent Cala Homes development of up to 125 dwellings was considered acceptable by the Local Planning Authority and Surrey County Council Highways Team.

As we have previously advised in our submission at the Site Options (Housing) consultation stage, a significant amount of work has previously been undertaken in the preparation of supporting documents to accompany a planning application for residential development of the Amlets Lane site. These works include an ecological survey (and subsequent reptile survey report), a transport statement, a landscape and visual impact appraisal, a flood risk assessment, a preliminary infrastructure appraisal and an archaeological assessment. Proposed site layout drawings have also been prepared, which take into account comments received from the council through the pre-application process and work undertaken through the preparation of the supporting documents. The latest proposed site plan is attached at **Appendix E** for reference.

The proposed site plan illustrates that the site can provide the following:

- 10 dwellings (comprising a mix of 2, 3 and 4 beds);
- an overall density of 8-9 dwellings per hectare in accordance with the adjoining Cala Homes development, which reflects the transition from the settlement area to the south into the countryside and the AONB to the north.
- a substantial buffer zone, with a minimum width of 32m, between Amlets Lane and the proposed development so as to retain the rural character of the local area and limit any detrimental impact on the AONB, AGLV and designated 'countryside beyond the Green Belt'.
- a safe vehicular access onto Amlets Lane;
- the provision of adequate off-road parking spaces for each dwelling through the inclusion of garages and driveways;
- a Local Area for Play (LAP);
- the provision of sufficient private amenity space for each dwelling; and
- an acceptable level of residential amenity for both future occupiers of the proposed development and existing adjoining residents.

In summary, the site south of Amlets Lane offers a logical extension to Cranleigh which would be contiguous with existing built development and the revised settlement boundary. Notably, the site is also outside of the Green Belt, AONB and AGLV, thereby reducing the need to develop elsewhere within these designations and has easy walkable access to the shops and services in the centre of Cranleigh. Moreover, the site south of Amlets Lane is not only *suitable* for housing, but significantly it is available and deliverable for development in the short term.

Conclusions

In conclusion, our key representations are summarised as:

- Policy CRAN1 should be more flexible in accordance with emerging Policy DM12 to balance facilitating appropriate development with protecting the character and beauty of rural areas.
- Future versions of the NP should take into account the 20% buffer now required to WBC's five-year housing land supply requirement following the recent publication of the Housing Delivery Test 2018 Measurement.
- Two of the three site allocations (CRAN4 and CRAN5) may not be available or deliverable owing to the fact that they are conditional on a new primary school facility being made available on an alternative site. Moreover, the delivery of the new primary school facility on the identified alternative site is currently subject to significant local objections from local residents, the Parish Council and Local Planning Authority.



- The site at St Nicholas Junior School (CRAN4) is not suitable as a housing allocation owing to matters relating to flood risk, particularly given that a site within Flood Zone 1 is available, namely our client's site at Amlets Lane.
- Our client's site at Amlets Lane is available and deliverable in the short term and is suitable for housing development. As such, our client's site should be allocated for housing in future iterations of the NP and accordingly included within the settlement boundary for Cranleigh.

We trust that the above will be of assistance. Should you have any queries or require any further details please do not hesitate to contact us.

Yours faithfully

A handwritten signature in black ink that reads 'R Robinson'.

Rachel Robinson
Senior Planner



APPENDIX A

Housing Delivery Test: 2018 measurement

ONS code	Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2018 measurement	Housing Delivery Test: 2018 consequence
		2015-16	2016-17	2017-18		2015-16	2016-17	2017-18			
E07000223	Adur	177	177	177	531	39	64	114	217	41%	Buffer
E07000026	Allerdale	132	125	108	365	357	195	462	1,014	278%	None
E07000032	Amber Valley	390	383	363	1,136	431	563	654	1,648	145%	None
E07000224	Arun	610	866	947	2,423	902	616	696	2,214	91%	Action plan
E07000170	Ashfield	437	426	471	1,334	561	582	401	1,544	116%	None
E07000105	Ashford	695	688	753	2,136	1,055	701	591	2,347	110%	None
E07000004	Aylesbury Vale	960	944	1,055	2,959	1,191	1,323	1,414	3,928	133%	None
E07000200	Babergh	220	292	300	812	157	226	331	714	88%	Action plan
E09000002	Barking and Dagenham	1,222	1,236	1,236	3,694	583	583	413	1,579	43%	Buffer
E09000003	Barnet	2,322	2,022	2,203	6,547	1,467	1,793	2,125	5,386	82%	Buffer
E08000016	Barnsley	819	804	857	2,480	706	850	1,009	2,565	103%	None
E07000027	Barrow-in-Furness	29	24	-65	0	87	108	105	300	NA	None
E07000066	Basildon	660	657	773	2,089	816	412	341	1,569	75%	Buffer
E07000084	Basingstoke and Deane	850	850	753	2,453	471	555	828	1,854	76%	Buffer
E07000171	Bassetlaw	342	332	281	955	339	459	551	1,348	141%	None
E06000022	Bath and North East Somerset	443	449	449	1,340	953	1,192	1,439	3,584	267%	None
E06000055	Bedford	898	891	995	2,784	964	1,255	1,371	3,590	129%	None
E09000004	Bexley	335	347	446	1,128	-75	764	314	1,002	89%	Action plan
E08000025	Birmingham	2,500	2,500	2,500	7,500	2,933	1,818	3,368	8,119	108%	None
E07000129	Blaby	265	261	286	812	733	743	588	2,064	254%	None
E06000008	Blackburn with Darwen	282	283	152	717	95	139	279	513	72%	Buffer
E06000009	Blackpool	153	160	94	407	250	-135	292	407	100%	None
E07000033	Bolsover	224	220	222	666	326	293	251	870	131%	None
E08000001	Bolton	716	960	746	2,422	543	423	482	1,448	60%	Buffer
E07000136	Boston	287	281	220	788	152	351	356	859	109%	None
E06000028	Bournemouth	730	730	893	2,353	732	607	631	1,970	84%	Buffer
E06000036	Bracknell Forest	565	553	497	1,614	324	437	442	1,203	75%	Buffer
E08000032	Bradford	1,862	1,870	1,573	5,305	907	1,488	1,642	4,037	76%	Buffer
E07000067	Braintree	273	504	640	1,416	529	291	491	1,311	93%	Action plan
E07000143	Breckland	555	548	533	1,636	617	793	530	1,940	119%	None
E09000005	Brent	1,407	1,525	1,525	4,457	1,217	1,961	1,202	4,379	98%	None
E07000068	Brentwood	302	305	325	933	111	150	213	474	51%	Buffer
E06000043	Brighton and Hove	655	655	655	1,965	680	332	496	1,509	77%	Buffer
E06000023	Bristol, City of	1,530	1,819	1,885	5,234	1,535	2,041	1,625	5,200	99%	None
E09000006	Bromley	641	641	641	1,923	666	890	565	2,120	110%	None
E07000234	Bromsgrove	465	466	445	1,376	477	297	513	1,287	94%	Action plan
E07000095	Broxbourne	373	377	401	1,151	177	287	302	767	67%	Buffer
E07000172	Broxtowe	360	358	321	1,040	101	285	314	700	67%	Buffer
E07000117	Burnley	63	60	68	192	208	201	335	744	388%	None
E08000002	Bury	556	550	529	1,635	335	368	277	980	60%	Buffer
E08000033	Calderdale	849	846	779	2,473	310	326	263	899	36%	Buffer
E07000008	Cambridge	296	309	413	1,018	1,185	1,613	1,145	3,943	388%	None
E09000007	Camden	844	1,120	1,120	3,084	1,092	1,277	894	3,263	106%	None
E07000192	Cannock Chase	245	245	231	722	-6	372	627	993	138%	None
E07000106	Canterbury	500	603	772	1,875	663	413	1,126	2,202	117%	None
E07000028	Carlisle	220	216	188	623	502	541	505	1,548	248%	None
E07000069	Castle Point	285	287	249	821	118	114	163	395	48%	Buffer
E06000056	Central Bedfordshire	1,614	1,589	1,798	5,001	1,626	1,773	2,107	5,506	110%	None
E07000130	Charnwood	761	760	822	2,344	831	943	1,107	2,881	123%	None
E07000070	Chelmsford	679	671	675	2,025	792	1,002	1,008	2,802	138%	None
E07000078	Cheltenham	450	450	412	1,312	358	286	769	1,412	108%	None
E07000177	Cherwell	561	552	564	1,677	1,425	1,102	1,387	3,914	233%	None
E06000049	Cheshire East	1,083	1,058	925	3,067	1,536	1,762	2,311	5,610	183%	None
E06000050	Cheshire West and Chester	632	612	554	1,798	1,827	2,057	2,686	6,570	365%	None
E07000034	Chesterfield	224	220	227	671	206	130	110	446	66%	Buffer
E07000225	Chichester	435	435	435	1,304	553	440	648	1,641	126%	None
E07000005	Chiltern	133	166	231	529	176	238	286	701	132%	None
E07000118	Chorley	422	417	499	1,338	606	517	661	1,784	133%	None
E09000001	City of London	98	94	71	263	77	7	26	110	42%	Buffer
E07000071	Colchester	882	870	831	2,583	1,149	912	1,048	3,109	120%	None
E07000029	Copeland	73	69	26	167	128	152	126	406	242%	None
E07000150	Corby	378	375	431	1,184	369	375	597	1,341	113%	None
E06000052	Cornwall	2,332	2,320	2,193	6,846	2,597	3,074	3,405	9,076	133%	None
E07000079	Cotswold	275	279	304	858	599	754	947	2,300	268%	None
E06000047	County Durham	1,378	1,357	1,297	4,032	1,528	1,398	1,737	4,663	116%	None
E08000026	Cowentry	1,020	1,139	1,300	3,459	1,406	1,129	1,095	3,630	105%	None
E07000163	Craven	142	143	123	408	175	198	221	594	146%	None
E07000226	Crawley	283	281	275	838	556	596	369	1,521	181%	None
E09000008	Croydon	1,331	1,646	1,646	4,624	2,034	2,888	2,067	6,989	151%	None
E07000096	Dacorum	431	431	431	1,293	654	737	587	1,978	153%	None
E06000005	Darlington	207	202	164	572	303	166	573	1,043	182%	None
E07000107	Dartford	580	574	600	1,754	981	1,162	1,031	3,174	181%	None
E07000151	Daventry	616	612	597	1,825	576	581	854	2,011	110%	None
E06000015	Derby	641	631	551	1,822	484	789	787	2,060	113%	None

E07000035	Derbyshire Dales	236	234	176	646	130	173	295	598	93%	Action plan
E08000017	Doncaster	621	602	541	1,764	1,162	1,049	1,208	3,419	194%	None
E07000108	Dover	392	392	481	1,266	752	465	440	1,657	131%	None
E08000027	Dudley	633	636	542	1,811	502	611	723	1,836	101%	None
E09000009	Faling	933	933	1,295	3,162	959	989	1,479	3,427	108%	None
E07000009	East Cambridgeshire	511	503	367	1,380	184	232	306	722	52%	Buffer
E07000040	East Devon	555	566	641	1,762	1,027	724	881	2,632	149%	None
E07000085	East Hampshire	492	492	476	1,460	297	429	792	1,518	104%	None
E07000242	East Hertfordshire	804	794	784	2,382	674	623	504	1,801	76%	Buffer
E07000137	East Lindsey	417	422	352	1,191	323	336	481	1,140	96%	None
E07000152	East Northamptonshire	281	283	338	902	565	461	452	1,478	164%	None
E06000011	East Riding of Yorkshire	1,032	1,021	838	2,891	941	1,138	1,227	3,307	114%	None
E07000193	East Staffordshire	458	451	379	1,288	471	546	702	1,719	133%	None
E07000061	Eastbourne	239	239	269	747	213	203	127	543	73%	Buffer
E07000086	Eastleigh	548	539	530	1,517	456	517	893	1,866	115%	None
E07000030	Eden	121	119	83	322	260	189	175	624	194%	None
E07000207	Elmbridge	225	362	443	1,030	240	267	130	637	62%	Buffer
E09000010	Enfield	759	798	798	2,355	660	954	389	2,003	85%	Action plan
E07000072	Epping Forest	654	661	667	1,982	267	149	564	980	49%	Buffer
E07000208	Epsom and Ewell	381	383	413	1,177	159	346	162	667	57%	Buffer
E07000036	Erewash	368	368	363	1,098	369	179	173	721	66%	Buffer
E07000041	Exeter	382	383	500	1,265	651	450	723	1,824	144%	None
E07000087	Fareham	150	270	327	746	374	356	291	1,021	137%	None
E07000010	Fenland	407	403	389	1,199	269	421	469	1,160	97%	None
E07000112	Folkestone and Hythe	350	350	350	1,050	314	658	489	1,461	139%	None
E07000201	Forest Heath	328	326	288	942	224	336	385	945	100%	None
E07000080	Forest of Dean	265	265	292	822	305	254	263	822	100%	None
E07000119	Fylde	240	238	263	741	308	455	512	1,276	172%	None
E08000037	Gateshead	475	465	433	1,373	231	293	161	685	50%	Buffer
E07000173	Gedling	373	372	409	1,154	162	198	223	583	51%	Buffer
E07000081	Gloucester	350	344	329	1,023	470	497	495	1,462	143%	None
E07000088	Gosport	170	170	170	510	180	166	221	567	111%	None
E07000109	Gravesham	325	325	325	975	180	167	275	622	64%	Buffer
E07000145	Great Yarmouth	301	301	301	902	213	186	207	606	67%	Buffer
E09000011	Greenwich	1,728	1,718	2,119	5,565	1,695	2,384	1,914	5,993	108%	None
E07000209	Guildford	521	514	551	1,585	388	501	299	1,188	75%	Buffer
E09000012	Hackney	1,315	1,599	1,599	4,513	1,237	1,186	1,287	3,710	82%	Buffer
E06000006	Halton	290	278	262	831	536	699	369	1,604	193%	None
E07000164	Hambleton	205	200	170	575	359	544	416	1,319	230%	None
E09000013	Hammersmith and Fulham	447	456	687	1,590	368	977	1,653	2,998	189%	None
E07000131	Harborough	350	365	407	1,121	636	468	580	1,684	150%	None
E09000014	Haringey	1,502	1,502	1,502	4,506	239	719	1,191	2,149	48%	Buffer
E07000073	Harlow	326	329	353	1,008	225	340	281	846	84%	Buffer
E07000165	Harrogate	389	386	282	1,057	257	325	609	1,191	113%	None
E09000015	Harrow	350	379	593	1,322	914	678	717	2,309	175%	None
E07000089	Hart	245	244	208	697	761	628	551	1,940	278%	None
E06000001	Hartlepool	204	185	195	584	527	185	268	980	168%	None
E07000062	Hastings	200	200	200	600	254	157	175	585	98%	None
E07000090	Havant	319	360	357	1,036	584	649	290	1,523	147%	None
E09000016	Havering	1,170	1,170	1,170	3,510	1,012	436	265	1,713	49%	Buffer
E06000019	Herefordshire, County of	600	710	678	1,987	374	260	836	1,470	74%	Buffer
E07000098	Hertsmere	268	268	318	854	384	405	559	1,348	158%	None
E07000037	High Peak	301	296	231	829	159	328	494	981	118%	None
E09000017	Hillingdon	425	425	478	1,328	745	779	894	2,418	182%	None
E07000132	Hinckley and Bosworth	367	364	391	1,122	593	569	423	1,585	141%	None
E07000227	Horsham	779	774	761	2,315	1,208	887	1,172	3,266	141%	None
E09000018	Hounslow	822	822	822	2,466	459	557	911	1,927	78%	Buffer
E07000011	Huntingdonshire	722	707	784	2,213	574	719	746	2,039	92%	Action plan
E07000120	Hyndburn	96	92	60	248	97	145	97	339	137%	None
E07000202	Ipswich	490	490	384	1,364	513	223	164	900	66%	Buffer
E06000046	Isle of Wight	523	523	531	1,577	417	324	371	1,112	71%	Buffer
E06000053	Isles of Scilly	-8	-7	-5	0	2	1	0	3	NA	None
E09000019	Islington	1,178	1,264	1,264	3,706	1,219	1,035	370	2,625	71%	Buffer
E09000020	Kensington and Chelsea	204	227	274	705	316	335	317	968	137%	None
E07000153	Kettering	454	449	447	1,351	547	706	495	1,748	129%	None
E07000146	King's Lynn and West Norfolk	499	500	448	1,447	505	412	401	1,318	91%	Action plan
E06000010	Kingston upon Hull, City of	569	555	399	1,523	549	624	1,341	2,514	165%	None
E09000021	Kingston upon Thames	375	375	631	1,381	249	291	502	1,042	75%	Buffer
E08000034	Kirklees	1,494	1,485	1,537	4,516	1,134	961	1,304	3,399	75%	Buffer
E08000011	Knowsley	259	249	260	768	293	475	626	1,394	182%	None
E09000022	Lambeth	1,195	1,195	1,195	3,585	1,780	1,140	1,544	4,464	125%	None
E07000121	Lancaster	313	317	368	998	515	628	523	1,666	167%	None
E08000035	Leeds	2,750	2,746	2,388	7,885	2,474	2,824	2,283	7,581	96%	None
E06000016	Leicester	1,154	1,154	1,280	3,588	1,131	1,560	1,954	4,645	129%	None
E07000063	Lewes	527	534	542	1,603	286	204	311	801	50%	Buffer
E09000023	Lewisham	1,385	1,385	1,385	4,155	1,531	1,845	567	3,943	95%	None
E07000194	Lichfield	387	380	315	1,082	200	326	573	1,099	102%	None
E08000012	Liverpool	1,269	1,240	1,596	4,105	2,065	3,485	2,382	7,932	193%	None
E06000032	Luton	425	425	425	1,275	624	777	873	2,274	178%	None
E07000110	Maidstone	883	877	883	2,642	521	1,145	1,286	2,952	112%	None

E07000074	Maldon	232	231	216	678	248	257	177	682	101%	None
E08000003	Manchester	2,160	2,128	2,423	6,710	1,735	1,728	3,018	6,482	97%	None
E07000174	Mansfield	259	254	251	765	388	238	234	860	112%	None
E06000035	Medway	1,341	1,322	1,334	3,997	553	661	669	1,883	47%	Buffer
E07000133	Melton	170	170	170	510	141	147	138	426	84%	Buffer
E07000187	Mendip	419	419	419	1,257	481	395	685	1,561	124%	None
E09000024	Merton	320	385	411	1,116	529	445	635	1,609	144%	None
E07000042	Mid Devon	307	306	285	897	352	329	529	1,210	135%	None
E07000203	Mid Suffolk	424	420	430	1,274	304	305	426	1,035	81%	Buffer
E07000228	Mid Sussex	753	754	812	2,319	884	1,060	611	2,555	110%	None
E06000002	Middlesbrough	248	245	245	738	705	547	453	1,705	231%	None
E06000042	Milton Keynes	1,562	1,543	1,482	4,587	1,194	1,229	1,485	3,908	85%	Action plan
E07000210	Mole Valley	353	358	318	1,030	158	207	423	788	77%	Buffer
E07000091	New Forest	717	726	700	2,144	138	351	266	755	35%	Buffer
E07000175	Newark and Sherwood	408	402	424	1,234	396	571	490	1,457	118%	None
E08000021	Newcastle upon Tyne	757	755	943	2,455	1,237	2,396	2,355	5,988	244%	None
E07000195	Newcastle-under-Lyme	254	252	315	821	165	422	232	819	100%	None
E09000025	Newham	2,500	2,410	1,994	6,904	1,749	2,319	850	4,919	71%	Buffer
E07000050	North Dorset	183	185	271	638	220	142	159	521	82%	Buffer
E07000038	North East Derbyshire	257	253	225	735	466	282	396	1,144	156%	None
E06000012	North East Lincolnshire	255	245	214	713	357	276	186	819	115%	None
E07000099	North Hertfordshire	704	699	709	2,111	341	539	281	1,161	55%	Buffer
E06000013	North Lincolnshire	514	505	399	1,418	379	272	386	1,037	73%	Buffer
E07000147	North Norfolk	386	387	401	1,174	486	442	555	1,482	126%	None
E06000024	North Somerset	1,049	1,049	1,022	3,121	569	852	863	2,284	73%	Buffer
E08000022	North Tyneside	551	740	729	2,020	543	908	965	2,415	120%	None
E07000218	North Warwickshire	197	199	172	568	208	326	227	761	134%	None
E07000134	North West Leicestershire	269	268	307	843	842	851	971	2,664	316%	None
E07000154	Northampton	587	577	578	1,742	739	991	881	2,611	150%	None
E06000057	Northumberland	695	678	609	1,981	988	1,530	1,376	3,894	197%	None
E06000018	Nottingham	880	880	880	2,640	947	974	1,393	3,314	126%	None
E07000219	Nuneaton and Bedworth	457	450	367	1,274	424	422	497	1,342	105%	None
E07000135	Oadby and Wigston	53	60	112	225	117	175	107	399	177%	None
E08000004	Oldham	289	446	660	1,394	260	326	313	899	64%	Buffer
E07000178	Oxford	362	375	529	1,266	440	435	373	1,247	99%	None
E07000122	Pendle	227	219	158	603	127	169	145	441	73%	Buffer
E06000031	Peterborough	1,077	1,052	973	3,102	920	1,201	706	2,827	91%	Action plan
E06000026	Plymouth	476	475	562	1,514	1,130	489	1,439	3,058	202%	None
E06000029	Poole	639	640	593	1,872	392	584	300	1,276	68%	Buffer
E06000044	Portsmouth	548	591	718	1,856	432	838	990	2,260	122%	None
E07000123	Preston	294	296	214	805	484	804	738	2,026	252%	None
E07000051	Purbeck	106	109	122	337	232	89	124	445	132%	None
E06000038	Reading	481	486	480	1,447	754	876	763	2,393	165%	None
E09000026	Redbridge	1,124	1,124	1,124	3,370	66	760	468	1,294	38%	Buffer
E06000003	Redcar and Cleveland	159	149	119	428	275	542	431	1,248	292%	None
E07000236	Redditch	34	31	-28	37	181	183	384	748	2046%	None
E07000211	Reigate and Banstead	460	460	460	1,380	535	517	594	1,646	119%	None
E07000124	Ribble Valley	143	138	139	419	300	390	400	1,090	260%	None
E09000027	Richmond upon Thames	315	315	315	945	507	446	379	1,332	141%	None
E07000166	Richmondshire	76	74	9	159	128	249	275	652	410%	None
E08000005	Rochdale	444	442	460	1,346	308	315	799	1,422	106%	None
E07000075	Rochford	251	255	259	764	159	116	299	574	75%	Buffer
E07000125	Rossendale	221	217	185	622	122	195	149	466	75%	Buffer
E07000064	Rother	336	336	336	1,008	246	283	168	697	69%	Buffer
E08000018	Rotherham	639	629	546	1,815	585	605	472	1,662	92%	Action plan
E07000220	Rugby	479	474	440	1,394	534	381	584	1,499	108%	None
E07000212	Runnymede	401	402	394	1,197	433	152	806	1,390	116%	None
E07000176	Rushcliffe	446	443	457	1,346	489	547	569	1,606	119%	None
E07000092	Rushmoor	293	290	217	800	173	364	450	987	123%	None
E06000017	Rutland	111	111	96	319	220	257	251	728	228%	None
E07000167	Ryedale	130	131	144	405	225	293	259	777	192%	None
E08000006	Salford	1,245	1,218	1,268	3,730	1,098	2,482	1,471	5,051	135%	None
E08000028	Sandwell	838	1,346	1,325	3,509	562	883	692	2,137	61%	Buffer
E07000168	Scarborough	180	182	147	509	330	443	452	1,225	241%	None
E07000188	Sedgemoor	505	509	584	1,598	518	597	508	1,623	102%	None
E08000014	Sefton	501	501	563	1,564	-181	644	532	995	64%	Buffer
E07000169	Selby	368	361	318	1,046	439	564	612	1,615	154%	None
E07000111	Sevenoaks	200	501	503	1,205	418	324	388	1,130	94%	Action plan
E08000019	Sheffield	1,820	1,823	1,922	5,565	1,589	2,247	2,304	6,140	110%	None
E06000051	Shropshire	1,024	1,003	1,013	3,039	1,402	1,910	1,876	5,188	171%	None
E06000039	Slough	922	910	690	2,522	789	524	846	2,159	86%	Action plan
E08000029	Solihull	616	623	610	1,849	711	547	751	2,009	109%	None
E07000006	South Bucks	133	330	310	773	85	569	299	953	123%	None
E07000012	South Cambridgeshire	877	860	840	2,577	674	597	729	2,000	78%	Buffer
E07000039	South Derbyshire	697	689	662	2,048	569	820	954	2,343	114%	None
E06000025	South Gloucestershire	1,095	1,085	1,139	3,319	1,107	1,630	1,599	4,336	131%	None
E07000044	South Hams	210	213	240	663	428	326	511	1,265	191%	None
E07000140	South Holland	431	429	349	1,209	293	266	296	855	71%	Buffer
E07000141	South Kesteven	574	565	607	1,746	495	478	448	1,421	81%	Buffer
E07000031	South Lakeland	194	194	160	547	438	253	292	983	180%	None

E07000155	South Northamptonshire	537	536	587	1,661	465	681	832	1,978	119%	None
E07000179	South Oxfordshire	414	415	424	1,253	585	722	939	2,246	179%	None
E07000126	South Ribble	297	289	193	779	430	237	312	979	126%	None
E07000189	South Somerset	596	591	583	1,770	662	621	563	1,846	104%	None
E07000196	South Staffordshire	179	179	194	552	217	230	255	702	127%	None
E08000023	South Tyneside	385	377	323	1,085	387	450	306	1,143	105%	None
E06000045	Southampton	781	787	813	2,381	1,046	997	826	2,869	120%	None
E06000033	Southend-on-Sea	824	824	847	2,495	222	480	521	1,223	49%	Buffer
E09000028	Southwark	1,630	2,155	2,156	5,941	1,436	2,520	816	4,771	80%	Buffer
E07000213	Spelthorne	483	487	424	1,394	308	347	221	876	63%	Buffer
E07000240	St Albans	670	668	649	1,987	396	347	412	1,155	58%	Buffer
E07000204	St Edmundsbury	361	359	331	1,051	472	398	239	1,109	106%	None
E08000013	St. Helens	532	518	454	1,504	575	487	411	1,473	98%	None
E07000197	Stafford	399	391	353	1,143	688	1,010	863	2,561	224%	None
E07000198	Staffordshire Moorlands	188	184	173	544	97	120	132	349	64%	Buffer
E07000243	Stevenage	376	373	366	1,115	153	887	78	1,119	100%	None
E08000007	Stockport	511	874	895	2,280	323	660	738	1,721	75%	Buffer
E06000004	Stockton-on-Tees	593	577	484	1,654	364	924	770	2,058	124%	None
E06000021	Stoke-on-Trent	444	444	478	1,366	501	756	703	1,960	143%	None
E07000221	Stratford-on-Avon	486	480	436	1,402	1,077	1,231	1,347	3,655	261%	None
E07000082	Stroud	458	458	458	1,374	430	356	501	1,287	94%	Action plan
E07000205	Suffolk Coastal	465	465	392	1,322	564	550	582	1,696	128%	None
E08000024	Sunderland	500	488	565	1,553	1,094	908	891	2,894	186%	None
E07000214	Surrey Heath	191	198	247	635	263	221	321	804	127%	None
E09000029	Sutton	363	427	427	1,217	339	706	763	1,809	149%	None
E07000113	Swale	776	776	776	2,328	593	556	572	1,721	74%	Buffer
E06000030	Swindon	1,151	1,231	871	3,253	1,442	1,699	801	3,942	121%	None
E08000008	Tameside	812	803	581	2,196	596	375	484	1,455	66%	Buffer
E07000199	Tamworth	177	173	90	440	66	160	151	377	86%	Action plan
E07000215	Tandridge	425	428	464	1,317	318	222	317	856	65%	Buffer
E07000190	Taunton Deane	482	476	492	1,450	887	983	896	2,766	191%	None
E07000045	Teignbridge	481	483	549	1,513	627	691	722	2,040	135%	None
E06000020	Telford and Wrekin	466	458	484	1,408	1,252	1,214	1,058	3,524	250%	None
E07000076	Tending	616	638	623	1,877	245	658	565	1,468	78%	Buffer
E07000093	Test Valley	317	318	411	1,046	1,041	928	799	2,767	265%	None
E07000083	Tewkesbury	401	397	470	1,269	625	728	945	2,298	181%	None
E07000114	Thanet	703	709	793	2,204	350	389	238	977	44%	Buffer
E07000102	Three Rivers	180	316	437	933	216	144	264	624	67%	Buffer
E06000034	Thurrock	814	815	851	2,480	711	603	857	2,171	88%	Action plan
E07000115	Tonbridge and Malling	634	629	612	1,875	912	886	1,108	2,906	155%	None
E06000027	Torbay	400	400	470	1,270	408	326	414	1,148	90%	Action plan
E09000030	Tower Hamlets	2,961	2,914	3,473	9,348	2,561	4,823	2,010	9,393	100%	None
E08000009	Trafford	794	786	1,021	2,601	379	323	523	1,225	47%	Buffer
E07000116	Tunbridge Wells	549	612	494	1,656	464	479	513	1,457	88%	Action plan
E07000077	Uttlesford	507	502	524	1,533	552	725	969	2,246	147%	None
E07000180	Vale of White Horse	398	396	511	1,305	1,133	1,621	1,604	4,357	334%	None
E08000036	Wakefield	1,041	1,026	927	2,994	1,921	1,816	1,759	5,496	184%	None
E08000030	Walsall	551	783	806	2,140	911	460	758	2,129	99%	None
E09000031	Waltham Forest	760	769	862	2,391	937	1,024	953	2,914	122%	None
E09000032	Wandsworth	1,452	1,448	1,459	4,359	2,645	2,448	2,239	7,332	168%	None
E06000007	Warrington	923	902	792	2,617	595	492	359	1,446	55%	Buffer
E07000222	Warwick	600	600	799	1,999	636	971	1,027	2,634	132%	None
E07000103	Watford	260	260	313	833	245	346	312	903	108%	None
E07000206	Waveney	312	313	299	925	133	243	293	669	72%	Buffer
E07000216	Waverley	551	553	471	1,575	234	408	598	1,240	79%	Buffer
E07000065	Wealden	452	450	499	1,400	518	564	487	1,569	112%	None
E07000156	Wellingborough	293	292	280	865	380	247	274	901	104%	None
E07000241	Welwyn Hatfield	535	544	623	1,701	507	671	314	1,493	88%	Action plan
E06000037	West Berkshire	525	525	394	1,444	625	518	539	1,683	117%	None
E07000047	West Devon	220	287	235	741	154	196	160	510	69%	Buffer
E07000127	West Lancashire	171	165	179	515	296	326	300	922	179%	None
E07000181	West Oxfordshire	437	434	408	1,279	251	518	544	1,313	103%	None
E07000191	West Somerset	91	95	72	258	99	132	103	334	130%	None
E09000033	Westminster	770	886	1,068	2,724	853	1,341	957	3,152	116%	None
E08000010	Wigan	1,000	1,000	898	2,898	639	817	948	2,404	83%	Buffer
E06000054	Wiltshire	1,756	1,737	1,603	5,096	1,842	2,858	2,407	7,107	139%	None
E07000094	Winchester	471	473	439	1,382	412	624	642	1,678	121%	None
E06000040	Windsor and Maidenhead	646	646	553	1,845	596	620	581	1,796	97%	None
E08000015	Wirral	695	680	718	2,093	498	328	704	1,530	73%	Buffer
E07000217	Woking	245	247	217	709	326	399	358	1,083	153%	None
E06000041	Wokingham	721	706	586	2,013	675	967	1,528	3,170	157%	None
E08000031	Wolverhampton	548	552	680	1,780	585	577	812	1,974	111%	None
E07000229	Worthing	200	598	622	1,420	477	347	492	1,316	93%	Action plan
E07000007	Wycombe	597	592	563	1,752	383	867	625	1,876	107%	None
E07000128	Wyre	276	274	272	822	337	498	364	1,200	146%	None
E07000239	Wyre Forest	191	189	201	581	226	262	184	673	116%	None
E06000014	York	766	763	832	2,361	691	378	1,331	2,400	102%	None

Joint plans being measured jointly for the purpose of the Housing Delivery Test: 2018 measurement

E07000144	Broadland; Norwich; South Norfolk	Broadland	1,693	1,676	1,634	5,003	2,059	2,513	2,086	6,658	133%	None
E07000148	Broadland; Norwich; South Norfolk	Norwich	1,693	1,676	1,634	5,003	2,059	2,513	2,086	6,658	133%	None
E07000149	Broadland; Norwich; South Norfolk	South Norfolk	1,693	1,676	1,634	5,003	2,059	2,513	2,086	6,658	133%	None
E07000048	Christchurch; East Dorset	Christchurch	488	500	540	1,528	300	436	405	1,141	75%	Buffer
E07000049	Christchurch; East Dorset	East Dorset	488	500	540	1,528	300	436	405	1,141	75%	Buffer
E07000138	Lincoln; North Kesteven; West Lindsey	Lincoln	976	970	961	2,907	1,177	933	1,135	3,245	112%	None
E07000139	Lincoln; North Kesteven; West Lindsey	North Kesteven	976	970	961	2,907	1,177	933	1,135	3,245	112%	None
E07000142	Lincoln; North Kesteven; West Lindsey	West Lindsey	976	970	961	2,907	1,177	933	1,135	3,245	112%	None
E07000043	North Devon; Torridge	North Devon	638	639	567	1,844	667	806	890	2,363	128%	None
E07000046	North Devon; Torridge	Torridge	638	639	567	1,844	667	806	890	2,363	128%	None
E07000052	West Dorset; Weymouth & Portland	West Dorset	514	520	577	1,611	671	772	633	2,076	129%	None
E07000053	West Dorset; Weymouth & Portland	Weymouth & Portland	514	520	577	1,611	671	772	633	2,076	129%	None
E07000237	Worcester; Malvern Hills; Wychavon	Worcester	894	888	987	2,769	1,828	1,539	1,799	5,166	187%	None
E07000235	Worcester; Malvern Hills; Wychavon	Malvern Hills	894	888	987	2,769	1,828	1,539	1,799	5,166	187%	None
E07000238	Worcester; Malvern Hills; Wychavon	Wychavon	894	888	987	2,769	1,828	1,539	1,799	5,166	187%	None
Development corporations												
E51000001	London Legacy Development Corporation		1,472	1,472	1,472	4,415	853	448	990	2,291	52%	Buffer

Notes:

Housing Delivery Test: 2018 consequences are concurrent (i.e. where the buffer applies, the action plan also applies)

Barrow-in-Furness and Isles of Scilly have zero final housing requirement due to negative household growth projections. Therefore they do not have a Housing Delivery Test 2018 measurement.

All results have been calculated in line with the Housing Delivery Test: 2018 measurement technical note. <https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement>

Housing requirement and homes delivered figures have been rounded to the nearest one decimal place in this spreadsheet. Unrounded figures have been used to calculate the HDT 2018 measurement figure. Therefore the percentages shown may be different to a calculation using the number of homes required and the number of homes delivered in this table. These have been included for context o

The final Housing Delivery Test 2018 measurement result has been rounded to the nearest 1%.

Values for each authority in a joint plan being measured jointly refer to the whole joint plan area



Ministry of Housing,
Communities &
Local Government

Housing Delivery Test: 2018 Measurement Technical note

19 February 2019
Technical note

Introduction

This document sets out the technical process followed in order to calculate the 2018 Housing Delivery Test measurement in line with the published Housing Delivery Test rulebook¹.

This document should be read alongside the Housing Delivery Test rulebook, and aims to offer more transparency into the process as opposed to setting out the policy in detail.

All terminology in this document mirrors that in the Housing Delivery Test rulebook.

The Housing Delivery Test measurement will be published annually by the department. The Housing Delivery Test period covers the previous three financial years; in the case of the 2018 measurement the years are 2015/16, 2016/17 and 2017/18.

In high level terms the Housing Delivery Test compares the net homes delivered over three years to the homes that should have built over the same period (their housing requirement).

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

The calculation is carried out based on published information and data specifically collected by the department from local planning authorities, National Parks and Development Corporations for the purpose of calculating the Housing Delivery Test.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf

Calculating the homes required

To calculate the total net homes required over the three year period the calculations draw on:

- Annual average household growth over a ten year period. This is calculated for each of the test years by authority based on household projections². The household projections used for each test year are: 2012-based in 2015/16; 2012-based in 2016/17; and, 2014-based in 2017/18³;
- Local plan information⁴; both the most recent local plan and the previous local plan. Only local plans which set out an authority's housing requirement are used. Data collected includes: the adoption date, start date, end date, housing requirements including trajectories, joint plan requirements, traveller requirements, and any unmet need which has been given to or taken from other authorities; and,
- Current London Plan annual monitoring targets 2015-2025 by borough⁵.

Given the wide ranging status and characteristics of local plans across England, the exact process to calculate results varied. Below sets out the five steps taken for all authorities and then goes through individual steps taken contingent on the plan status and characteristics which affect the application of the Housing Delivery Test.

For every local planning authority, the steps below were taken:

1. For every local authority annual average household growth over ten years is calculated based on the household projections available as at 1st April in each test year².
2. In some cases annual average household growth may be negative for one or more of the years being tested. In these instances all three years of the household growth including negative values are summed. If the three year summed result is a negative value, this is set to zero. If the

² Household projections as available at the 1st April in each of the corresponding test years. Annual average household growth is calculated by calculating the total household growth between the test year and ten years in the future, then dividing this by ten. For example: For the test year 2015/16 the 2012 based household projections are used. The total household growth over this period is calculated by taking the difference between the number of household in 2015 and 2025. This is converted into an annual average by dividing this total change by ten.

³ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>

⁴ Local plan information was collected by the department from authorities using Delta webform. In some instances, the information as submitted was adapted for the Housing Delivery Test 2018 measurement and decisions about what information to use were decided on a case by case basis. For example, where plans were adopted following the submission of data from local authorities, information has been sourced from the published plans.

⁵ <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-three-londons-people/policy>

sum of the three years of annual household growth is positive (despite one or more negative years), the figure is not changed.

3. Net unmet need is calculated for each authority by summing all the need taken (the authority becomes responsible for delivering this housing) and taking away all need given (the authority is no longer responsible for this housing).
4. To convert this into an annual figure, the number of years the plan covers is calculated by taking the difference between the start date of the plan and the end date of the plan; classifying both the start date and end date as days the plan covers. The total net unmet need figure by authority is then divided by the total plan period.
5. The annual net unmet need for each authority is then added to the annual average household growth for each test year.

In addition to steps 1 to 5, for an authority without an ‘up to date’⁶ local plan the steps below were taken:

1. The housing requirement is based on the household growth plus unmet need figure, set out in an adopted plan, (as calculated in steps 1 to 5 above) for each year).
2. The number of homes required for each year over three year period is based on the lower of the housing requirement (as above) or household growth plus unmet need. In the incidence where a local authority has no up to date local plan, the ‘lower of’ policy does not change the total number of homes required.

In addition to steps 1 to 5, for an authority with an ‘up to date’ local plan for the entire Housing Delivery Test period the steps below were taken:

1. The housing requirement is based on the annual target from the most recent plan for each year. If the local plan includes a stepped requirement then the annual target from the stepped requirement corresponding to the relevant period is used.
2. The number of homes required each year over the three year period is based on the lower of the housing requirement or household growth plus unmet need in each year. For each individual year that the annual target is greater than annual average household growth plus unmet need, the lower figure is used.
3. The final number of homes required sums each year’s lower figure to calculate the three year total number of homes required.

In addition to steps 1 to 5, for an authority with an ‘up to date’ local plan which expired during the Housing Delivery Test period the steps below were taken:

1. The housing requirement is based on the annual target from the most recent plan for each year. If the local plan includes a stepped requirement then the annual target from the requirement corresponding to the relevant period is used, and the steps below are applied in the same way.

⁶ An ‘up to date plan’ for the purposes of the Housing Delivery Test is a plan which is less than five years old, or is older than five years old been reviewed and found not to require updating.

2. If the plan becomes out of date then from this point onwards the housing requirement is based on annual average household growth plus unmet need.
3. If the plan becomes out of date midway through a year, a weighted average for that year is calculated. This means that for as many days that the plan was 'up to date' within a test year, the annual target is used. For the remainder of the year, annual average household growth plus unmet need is used.
4. The number of homes required each year over the three year period is based on the lower of the housing requirement or household growth plus unmet need in each year.
5. In this instance, the housing requirement in a given test year could be:
 - a. The target from the plan (if the plan is 'up to date' for the full year);
 - b. A weighted average of the target from the plan and annual average household growth plus unmet need (if the plan is only 'up to date' for part of the year); or,
 - c. Household growth plus unmet need (if the plan is out of date for the full year).
6. For each individual year that the annual target is greater than annual average household growth plus unmet need, the lower figure is used.
7. The final number of homes required sums each year's lower figure to calculate the three year total number of homes required.
8. Similarly to the above, if an authority adopts a plan which covers the latter part of the Housing Delivery Test period then prior to the period the plan covers, annual average household growth plus unmet need is used. From the point following the plan start date, the housing target from this is used (using the relevant stepped requirement where appropriate). The "lower of" policy is applied in the same way, comparing the housing requirement in each year to annual average household growth plus net unmet need.

In addition to steps 1 to 5, for an authority with a previous plan which was 'up to date' for part of the Housing Delivery Test period and whose current plan was 'up to date' for part of the Housing Delivery Test period the steps below were taken:

1. If the previous plan 'up to date' for part of the Housing Delivery Test period, but the current plan start date encompasses the Housing Delivery Test period that the previous plan covered, the most recent plan is used and the previous plan is not.
2. If the previous plan is 'up to date' for part of the Housing Delivery Test period and this period does not overlap with the current plan, then the previous plan is used for as long as it is valid. After this period the most recent plan is used.
3. If there is a period where there is no plan, then annual average household growth plus net unmet need is used for this period.
4. Where the periods above do not align with a test year, a weighted average for that year is calculated. This means that for as many days that the previous plan was 'up to date' within a test year, the annual target from that plan is used. For the remainder of the year, either the current plan or annual average household growth plus unmet need (depending on the status of the current plan) is used.
5. The "lower of" policy for each year is applied based on the housing requirement and annual average household growth plus net unmet need. For each individual year that the annual housing requirement is greater than annual average household growth plus unmet need, the lower

figure is used. The final number of homes required sums each year's lower figure to calculate the three year total number of homes required.

In addition to steps 1 to 5, for a London borough including Development Corporations with full plan making and decision making powers⁷ the steps below were taken:

1. **London boroughs** are treated the same as the other authorities, except where there is no 'up to date' plan the most recent adopted London Plan annual borough target⁸ is deferred to (in the place of household growth plus net unmet need) rather than household growth for the measure of need. If a London Borough has a previous plan that was 'up to date' for part of the Housing Delivery Test period, then this plan is used for the period it applies for.
2. If the borough plan becomes out of date midway through a year, a weighted average for that year is calculated. This means that for as many days that the plan was 'up to date' within a test year, the annual target is used. For the remainder of the year, the annual borough target from the London Plan is used.
3. If the borough plan includes a stepped requirement then the annual target from the requirement corresponding to the relevant period is used, and the steps above are applied in the same way.
4. The number of homes required each year over the three year period is based on the lower of the housing requirement or household growth plus unmet need in each year.
5. In this instance, the housing requirement in a given test year could be:
 - a. The target from the borough plan (if the plan is 'up to date' for the full year);
 - b. Annual borough target from the London Plan (if the plan is not 'up to date' for the full year); or,
 - c. A weighted average of the target from the borough plan and annual borough target from the London Plan (if the plan is only 'up to date' for part of the year); or,
 - d. A weighted average of the target from the previous borough plan and the weighted average from the current borough plan (if the previous plan is 'up to date' for part of the period, and the current borough plan follows directly from this)
 - e. A weighted average of the target from the previous borough plan and the annual borough target from the current London Plan (if the previous plan is 'up to date' for part of the year and there is no current borough plan to cover the rest of the test year period)
 - f. A weighted average of the target from the previous borough plan, the borough target from the current London Plan and the target from the current borough plan (if the previous plan is 'up to date' for part of the period, and the current borough plan follows indirectly from this meaning the London Plan is relied upon in the interim period)
6. For each individual year that the annual housing requirement is greater than annual average household growth plus unmet need, the lower figure is used.

⁷ There is no 2018 Housing Delivery Test result for Old Oak and Park Royal Development Corporation as they have been recently created and do not have published targets against which to be measured.

⁸ The London Plan figure remains valid for 5 years from the date of adoption, even where the plan is undergoing a revision.

7. The final number of homes required sums each year's lower figure to calculate the three year total number of homes required.
8. **The London Legacy Development Corporation's** housing requirement is based on their DELTA return in the same way as other authorities. Given there is no separately published annual average household growth, the "lower of" policy is not applied. Therefore the target from their local plan is their final number of homes required.

In addition to steps 1 to 5, for authorities covered by a joint plan with a joint requirement the steps below were taken:

1. Where authorities have a joint plan and are being measured jointly for the purpose of the Housing Delivery Test the housing requirement, where the joint plan is 'up to date', the joint plan target is used.
2. If the joint plan becomes out of date during the test period then a weighted average for the year is calculated; using the joint plan target up to this point and from then onwards the total household growth plus net unmet need across all of the component local authorities is deferred to.
3. For each individual year that the joint annual housing requirement is greater than the joint annual average household growth plus unmet need, the lower figure is used.
4. The final number of homes required sums each year's lower figure to calculate the three year total number of homes required.

The housing requirement for travellers:

In addition to steps 1 to 5 and the relevant process depending on local plan status, where applicable the requirement for traveller accommodation⁹ are added to the housing requirement.

This addition takes place prior to the application of the "lower of" policy which compares the housing requirement (containing the travellers housing requirement) and the annual average household growth plus net unmet need, choosing the lower for each year as the number of homes required for that test year.

The travellers housing requirement is calculated through the steps below:

1. The travellers accommodation requirement is based on the travellers annual target from the most recent plan for each year. If the local plan contains no travellers requirement then no adjustment is made.
2. Where there is a travellers requirement and the plan becomes not 'up to date' then from this point onwards the travellers adjustment is no longer made.
3. If the plan becomes not 'up to date' midway through a year, then for as many days that the plan was 'up to date' within a test year, the travellers annual target is used (apportioned based on how many days this was 'up to date'). For the remainder of the year, no travellers housing requirement is added.

⁹ Meeting the definition in the Planning Policy for Traveller Sites (August 2015)

4. If the local plan includes a stepped requirement for the travellers requirement, then the annual target from the requirement corresponding to the relevant period is used, and the steps above are applied in the same way.

Calculating the homes delivered

To calculate the total net homes delivered over the three year period the calculations draw on:

- Net additional dwellings¹⁰ by local authority district, England 2001-02 to 2017-18^{11,12};
- Housing supply; communal accommodation, component flows of by local authority district, England 2015-16, 2016-17 and 2017-18 (published as part of the Net supply of housing release¹¹);
- Number of students in student only household by the number of bedrooms where all students are aged 18 and over, Office for National Statistics based on 2011 census^{13,14};
- Age of Household Reference Person by number of adults in household where all household reference persons are aged 16 and over, Office for National Statistics based on 2011 census^{14,15};
- Data supplied to the department by local planning authorities and National Parks about the number of homes within a local planning authority boundary that were delivered in a National Park, 2015-16, 2016-17 and 2017-18; and,
- Data supplied to the department by the Greater London Authority about housing completions in the London Legacy Development Corporation that was within different local authority boundaries, Residential Completions between 01/04/2017 and 31/03/2018 by Planning Authority from London Development Database.

¹⁰ As defined in the Housing Flow Reconciliation guidance. Net additions measure the absolute increase in stock between one year and the next, including other losses and gains (such as conversions, changes of use and demolitions).

¹¹ The 2017/18 published figure for Thanet has been manually adjusted by MHCLG to remove 84 units incorrectly included in the raw data by the authority. These units were empty homes returning to use and were removed as they did not meet the definition of a net additional dwelling.

¹² <https://www.gov.uk/government/collections/net-supply-of-housing>

¹³ Used to calculate the national average number of adult students living in a student only household where all students are aged 18 and over (2.5).

¹⁴ These tables were specifically commissioned for this purpose, now published by the ONS.

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/housing/adhocs/008207ct07732011censusnumberofstudentsinstudentonlyhouseholdnationaltolocalauthoritylevel/ct07732011censusnumberofstudentsinstudentonlyhouseholdnationaltola.xls>

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/housing/adhocs/008208ct07742011censusageofhouseholdreferencepersonhrpbynumberofadultsinhouseholdnationaltolocalauthoritylevel/ct07742011censusageofhrpbynumberofadultsinhhnationaltola.xls>

¹⁵ Used to calculate the national average number of adults living in a household where all Household Reference Persons are aged 16 and over (1.8).

To calculate the homes delivered, the steps taken were:

1. For each local planning authority, net additional dwellings for the test years are used as the starting point. These are then adjusted in a number of ways.
2. **For each authority** estimate the number of net dwellings that would be freed up from the net additional student and other communal accommodation built over the three year period. This is calculated by dividing each authority's student bedspaces annual net change by the national ratio (2.5) and each authority's other communal bedspaces annual net change by the national ratio (1.8).
3. Adjust the net additional dwellings for each authority by the annual estimate of the number of dwellings which would be required in the absence of the net communal accommodation bedspaces change.
4. **For the local planning authorities whose boundaries overlap with a National Park**, remove the net additional homes delivered in the National Park¹⁶ each year from the net additional dwellings statistics.
5. **For the local planning authorities whose boundaries overlap with the London Legacy Development Corporation**, for the periods that the local planning authority's delivery is based on the London Plan, the net homes delivered in the London Legacy Development Corporation are removed from the net addition dwellings statistics based on the data provided to the department by the Greater London Authority.
6. Borough plans which pre-date the formation of the LLDC do not give a requirement broken down into dwellings in the borough and dwellings in the London Legacy Development Corporation; however the London plan does give separate plan numbers. This means where the borough's requirement is based in the London Plan this will not include the homes to be delivered in the London Legacy Development Corporation however when the requirement is based on their own plan it will include these homes. Therefore the adjustment to net additional dwellings, removing those homes delivered in the London Legacy Development Corporation, should only be applied for the period where the requirement is based on the London Plan. For these periods, neither the requirement nor the net additions include the homes in the London Legacy Development Corporation.
7. If the borough's requirement is based on different sources within a test year (for example, the borough plan and then the borough target from the London plan then the removal of net additions each year is scaled to the proportion of the year that the London Plan is relied upon for the housing requirement.

The final measure of the homes delivered is the sum of the annual net additional dwellings adjusted for National Park and Development Corporation delivery and the estimated net change in the dwelling stock due to the change in communal accommodation bedspaces.

¹⁶ As provided to the department by local planning authorities and National Parks

Calculating the results

The final result for each authority is based on their number of homes required over the three year period and the adjusted net additions over the same period.

In all cases, the requirement for the number of homes is based on the lower of their annual housing requirement (based on the local plan status and characteristics) and annual average household growth adjusted for net unmet need. The lower figure in all years are summed to calculate the number of homes required over the total three year period for the purpose of the Housing Delivery Test.

The annual net additional dwellings adjusted for National Park and Development Corporation delivery and the change in communal accommodation bedspaces are summed to calculate the total number of homes delivered over the three years for the purpose of the Housing Delivery Test.

Comparing these two totals gives the individual Housing Delivery Test result for a given authority, joint plan or development corporation.

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

In cases where the total number of homes required is zero the Housing Delivery Test result is undefined and no consequences apply.

© Crown Copyright, 2019

Copyright in the typographical arrangement rests with the Crown.

February 2019

ISBN: 978-1-4098-5421-0



APPENDIX B

WA/2017/0696
P Roche
Surrey County Council
18/04/2017

Consultation under Regulation 3 for construction of a two storey building with associated car parking provision, landscaping, all-weather sports pitch, and new access road from Parsonage Road to provide a replacement for Cranleigh Primary School with capacity of two forms of entry at infant stage and three forms of entry at junior stage on a single site currently forming part of Glebelands School playing field, at Land At Glebelands School, Parsonage Road, Cranleigh GU6 7AN

Public Notice:	Was Public Notice required and posted: N/A – a County Council application
Grid Reference:	E: 505866 N: 139356
Parish:	Cranleigh
Ward:	Cranleigh West
Case Officer:	Mrs J Dawes
Consultation Date:	15/05/2017
Extended date for comment agreed with case officer	26/05/2017

RECOMMENDATION

That, serious concerns be raised in relation to the proposed access and parking implications in the vicinity.

Site Description

The application site currently consists of the playing fields belonging to Glebelands Secondary School, the existing school buildings lying to the east of the application site. Between the existing school buildings and the application site is a bowls club, which comprises a single storey building with associated bowls green, car park and access from Parsonage Road.

Immediately to the north of the site lies a small stream, beyond which are further playing fields belonging to Cranleigh Preparatory School. To the south of the site is a public footpath, beyond which are the rear gardens of properties fronting onto the Common. A residential area lies to the west, and the Christopher Robin Nursery is located immediately to the east of the access drive.

The land is relatively level, with a well established band of trees running through the middle of the site in a north / south direction.

The application site measures 3.34 hectares.

Proposal

The proposed development includes the development of a new school building with associated access, parking, and landscape works comprising the following:

- Construction of a two storey school building to accommodate a two form entry infant school, a three form entry junior school and a separate independent nursery;
- The provision of a new access from Parsonage Road;
- The provision of a staff car park for 46 spaces with two accessible parking spaces and delivery drop-off area (no parking or drop off area for children / parents is to be provided);
- All weather sports pitch;
- External landscape area including trim trail, outdoor learning area and hard and soft play areas.

The school building would take a linear form, positioned in a north to south axis and would be located within the eastern half of the site, immediately to the west of the Bowls Club. The all weather pitch would be on the western side of the site.

Access to the site would be via a new access road along the southern boundary of the adjacent bowls club, linking to Parsonage Road.

Relevant Planning History

There is a lengthy planning history at the wider Glebelands site, however the most relevant of which includes:

SCC EIA Case 017-012	Screening Opinion request for proposed development of a new primary school with associated external works and car parking provision	EIA not required 6 th March 2017
WA/2014/1456	Installation of tarmac	WBC : No objection

SCC 2014/0119	surfaced extension to staff car parking, 34 spaces, hard standing for bike shelter and tarmac path.	28/8/2014 SCC 24/10/2014 Granted
WA/2014/0110	Erection of enclosed entrance shelter adjoining sports hall, installation of two timber clad storage containers each with a timber clad shingle clad lead roof.	
WA/2013/0355	Erection of a cricket pavilion	Full Permission 1/05/2013
WA/2012/1638	Erection of a cricket pavilion	Full Permission 06/12/2012
WA/2008/0381 SCC 2008/0024	Consultation under Regulation 3 for the construction of single storey flat roofed extension to existing day nursery building to provide children's centre facilities	WBC No objection 24/04/2008 SCC 24/04/2008 Granted
WA/1997/0064	Erection of a detached building to provide a day nursery	Full Permission 19/06/1997

Planning Policy Constraints

Public Footpath
 Southern Gas Networks - GPL
 Countryside beyond Green Belt
 Neighbourhood Plan Designation
 Ancient Woodland 500m buffer
 River bank within 20m
 Flood zone 3
 Flood zone 2
 River bank within 8m
 Adjacent to a Conservation Area

Development Plan Policies and Proposals

Saved Policies C2, HE8, D1, D4, D5, D6, D7, D8, CF3, M1 and M4 of the Waverley Borough Local Plan 2002.

Draft Local Plan Part 1 Strategic Policies and Sites 2016 Policies: RE1, TD1, NE1, NE2, NE3, SP2, ALH1, ST1

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all applications for planning permission to be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The adopted Local Plan (2002) therefore remains the starting point for the assessment of this proposal.

The National Planning Policy Framework (NPPF) is a material consideration in the determination of this case. In line with paragraph 215 due weight may only be given to relevant policies in existing plans according to their degree of consistency with the NPPF. The report will identify the appropriate weight to be given to the Waverley Borough Local Plan 2002.

The Council is in the process of replacing the adopted 2002 Local Plan with a new two part document. Part 1 (Strategic Policies and Sites) will replace the Core Strategy that was withdrawn in October 2013. Part 2 (Non-Strategic Policies and Site Allocations) will follow the adoption of Part 1. The new Local Plan builds upon the foundations of the Core Strategy, particularly in those areas where the policy/approach is not likely to change significantly. The Council approved the publication of the draft Local Plan Part 1 for its Pre-submission consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on 19 July 2016. The consultation period commenced in August 2016 and closed on 3 October 2016. On the 21st December 2016 the Council submitted the draft Local Plan Part 1 for Examination. In accordance with paragraph 216 of the NPPF, weight can be given to the draft Plan, but the degree to which it can is determined by the stage the Plan has reached and the extent to which there are any unresolved objections to it. It is considered that significant weight can be given to the Draft Plan following its publication on Friday 19 August, given its history of preparation thus far, the iterations of it and the extent of consultation and consideration on it to date. The weight afforded to the Draft Local Plan will increase as the Plan progresses through Examination and onto its adoption in 2017.

Other guidance:

- National Planning Policy Framework (2012)
- National Planning Practice Guidance (2014)
- Climate Change Background Paper (2011)

- Open Space, Sport and Recreation (PPG17) Study 2012
- Statement of Community Involvement (2014 Revision)
- Strategic Flood Risk Assessment (2015/2016)
- Planning Infrastructure Contributions SPD (2008)
- Cycling Plan SPD (April 2005)
- Council's Parking Guidelines (2013)
- Vehicular and Cycle Parking Guidance (Surrey County Council 2012)
- Waverley Local Plan Strategic Highway Assessment (Surrey County Council, 2016)
- Surrey Design Guide (2002)
- Cranleigh Village Design Statement (2008)

Consultations and Parish Council Comments

Cranleigh Parish Council - Objection

Committee members are very concerned about this application.

- Members strongly object to the construction plan hours of 7.30 am – 6pm. It must be outside of school drop off and pick up times and not before 8am on a Saturday morning, as there are residential properties bordering the site.
- Surrey County Council are wilfully ignoring the safety issues of the road by placing the entrance of the school on a dangerous corner which lacks space to accommodate the increased volume of traffic.
- The existing drop off and pick up points are inadequate as they are fully used by the buses and coaches for the schools and by the residents of Sarus Place and surrounding roads having to use this area for parking as insufficient parking was provided for the residents. With doubling the students entering this area the safety issues will increase.
- The playing fields to be provided are insufficient for the potential 600 children that will attend the school along with the 60 nursery children. The area provided comes below the recommended guidelines.
- The initiatives in place, for example the walking bus which only takes place during June and July, will give inaccurate figures as to those attending school by foot.
- The bat survey is insufficient, due to it not being completed to the requirements expected i.e. number of visits and the months the visits took place.

The Committee would like to highlight the comments made to Surrey County Council:

Committee Members are extremely concerned for the safety of the infant school children, due to the positioning of the school in a busy residential road where the entrance is proposed to be placed on the corner of Parsonage Road. The road appears to be wide enough for two cars but with no paved path area for parents and children to access the school.

The plans clearly show a lack of consideration for infant school children aged 5-11 and indeed nursery-aged children gaining safe access, with no clear paved entrance and no amount of parking for parents or a drop off system. The nearest car park is at least a 15-minute walk with young children, across a highly-congested high street. Also, the impact of adding 100 more children into the area which is already very busy has not been sufficiently considered. Noting that a nursery is also included at site with children aged 2-5.

Concerns were raised as to the knock-on effect to local businesses due to the increased congestion of the High Street at school drop off and pick up times, with the pedestrian light usage being increased due to the proposed location of the school and additional children attending the school.

Members highlighted their concerns that the site has flood zones 2 and 3, with the flash flooding of the High Street and surrounding areas during the Cranleigh Carnival 2016 after a short spell of heavy rain. Committee Members recommend that this is considered.

The Committee would have liked the plans to be presented to them by Surrey County Council.

Representations

This is a Regulation 3 application and this Council is a consultee. The County Council undertakes all consultations with interested parties and statutory consultees.

Notwithstanding the above however, this Authority has received copies of letters of objection which raise the following concerns:

- Whilst school building, playing pitch and staff parking have been considered, no thought has been given to the huge increase in numbers of school children travelling to and from and arriving at the school;
- The impact of 3 schools will now be concentrated in Glebelands area;

- The schools currently have a lower population than the future expectation;
- The existing infants school has available parking for parents;
- There is no provision for parent parking in the new application to drop of infants; also no drop off area;
- The impact of additional housing could double the number of children at Glebelands;
- Proposal puts new and existing school attendees at risk when travelling to and from school;
- The Councils have a duty of care to ensure safe arrival and departure of children attending the schools;
- Cars already park all over the roads and land in front of neighbouring properties;
- Implications for parking on the High Street and the Common, obstructing access to properties and driveways on the Common;
- Implications as to the use of footpath from the Common – cars slowing to let children out, additional signage; lighting provision; implications for paving and levelling of path given that it is below level of adjacent gardens; narrow width of path with trees in the way will limit ability to pass; flooding implications from footpath and unclear as to the provision of new fencing along the footpath;
- Site is partially in Flood Zones 2 and 3;
- Proposal is in the wrong location;
- Air, light and noise pollution;
- Design and structure is out of keeping with the Conservation Area of the Common;
- Mitigation measures lack detail;
- Over 40% of pupils travel more than 1.5 km, therefore how realistic will alternative means of travel be?;
- Concern that residential access routes would be blocked, causing obstruction and nuisance to residents – what sanctions would be put in place;
- Shame to lose playing field – existing sites should be redeveloped;
- Increased urbanisation of Cranleigh;
- Out of hours community usage as a general purpose community centre – implications for access, parking and noise and disruption and impact on residential amenities;
- Raising funds from renting out the premises should not be at the expense of residents;
- Monies raised from the sale of existing premises should provide money to make proposal sustainable;
- Proceeds from disposal of playing fields should be reinvested into improving sports / education facilities;
- Support for a school but not a community centre;

- Implication of viewing mound and dipping pond close to residential properties;
- Noise implications from construction of the pitch and fencing surround – a blight on rural landscape;
- Building is unimaginative urban building, which does not fit comfortably within its setting;
- Lighting should not be left on all night, and the pitch should not be floodlit;
- Insufficient detail as to the colour and layout of the proposed pitch;
- Cost of grounds maintenance;
- Flooding has occurred in adjacent gardens not just along the northern boundary of the site – what mitigation is to be put in place? Implications for properties to south – increased impermeable surface cover and hence run-off;
- Mesh boundary fencing would be unsightly and not suitable for the Conservation Area;
- Large delivery vehicles and emergency vehicles will struggle to navigate the narrow lane;
- Limited soft landscaping of car park area;
- Design of building and classrooms pays no regard to the children growing older and moving on;
- Footpath runs along boundaries of residential properties, lit paths will encourage loitering and thus a security risk;
- There are already many buildings used by the community in Cranleigh;
- Existing schools need to be rebuilt – but not relocated;
- On site Key Stage 1 drop off should be a planning condition to be retained in perpetuity;
- Should be a residents only parking scheme introduced for Rowland Road residents;
- Congestion and inconsiderate parking has damaged the area, caused by the concentration of schools in a small area;
- Landscape buffers to residential properties should be provided, implications for exhaust fumes, noise etc;
- The application has a wealth of information which is difficult to capture – should be more dialogue with local residents.

Submissions in support

In support of the application the applicant has submitted a wealth of information and studies. The planning statement however, concludes that the proposals have been developed following a detailed feasibility study and design process which has included community consultation and pre-application discussions.

- The principle of a school at this site is supported through national and adopted Local Plan policies;
- The proposals will provide a range of planning benefits for the site and the surrounding area, complying with relevant national and local planning policies;
- The proposals will provide future capacity to meet the need for school places in the local area;
- A detailed site selection and appraisal process has been undertaken to explore viable alternative sites and the most appropriate layout within the selected site;
- Proposals are design led and have evolved through contextual analysis and pre-application discussions with officers to ensure a high architectural design quality as influenced by the site topography and setting;
- Proposed development and associated mitigation measures aim to promote active and sustainable travel to and from the School, and minimise the traffic impacts of the development;
- The proposal seeks to retain and enhance features of ecological value and biodiversity to create a sustainable and attractive low impact development;
- The proposed development will utilise sustainable and energy efficient building techniques and aims for a very good BREEAM rating;
- Flood risk has been fully considered and the proposed development includes a detailed flood risk mitigation and drainage strategy.

The Design and Access Statement notes:

The proposal to amalgamate the infant and junior schools, nursery school and Speech Language and Communication Needs Centre will provide a total pupil base of 608 children between the ages of 2 and 11 years. The statement concludes that the proposal would provide the necessary educational infrastructure to support the delivery of additional houses as outlined in the Waverley Borough Local Plan.

The new building would contribute to the creation of a sustainable community, which is safe, attractive and inclusive and where the high quality design of the new development would make a positive contribution to the area.

The design has been formulated after careful assessment of the building and its relationship to its surroundings.

Furthermore, the proposed design and layout would not prejudice the provisions of sports in the area and would respect the residential amenities of neighbouring properties.

The Transport Statement notes:

- Proposal will create an additional 210 pupil spaces. The increased numbers are not expected to have a material impact on the capacity of the local highway network and the junctions surrounding the School site.
- The Surrey Parking Strategy identifies that school run parking is an issue around many schools across Surrey, although it is a concentrated problem for a relatively short period of time. The County Council's Safer and Smarter Travel Team works with schools across the county to promote School Travel Plans which are designed to promote sustainable travel and reduce the reliance on the use of cars for the school run;
- The Vehicle and Cycle Parking Guidance 2012 developed as part of the parking strategy recognises that in relation to school car parking that 'Operational requirements (broadly defined as staff and visitors) should be provided for only, together with an overflow parking area for community uses. Parent parking, pupil parking and drop off / pick up areas should not be provided as this is a disincentive to travelling by sustainable modes;
- Parking in the wider area is under moderate pressure during the morning peak period, although less constrained in the afternoon;
- Parking beat surveys identify that residual capacity for parking in the wider area exists and is sufficient to accommodate demand generated by residents, staff members and parents during drop off and collection periods;
- The majority of pupils and staff travel to existing schools by car;
- The public footpath located to the southern side of the school will be paved and have a minimum width of 2m, although the north- south section would remain as existing;
- The proposed school would have 62 cycle spaces, 54 allocated for pupils and 8 for staff;
- The expansion of the school will generate 84 additional car trips which results in 168 two way vehicle movements in the morning and afternoon peak periods. The threshold value of 60 two way movements per peak is typically used as the threshold value for assessing if the development will have a material impact on the local highway network. Although given that vehicles are likely to arrive from different directions they are unlikely to impact on one particular junction;
- The proposed car park will provide 48 staff car parking spaces (an increase over the existing), a drop of area for SEN pupils and mini buses, and increased provision for cyclists / scooters;

- Off site measures include improvements at the junction of Parsonage Road with Cranleigh Bowl Club access road and local widening of existing footpath on the western side of the Bowl Club access road;
- Parking occupancy analysis identified that the predicted demand can be accommodated in the wider area, although there may be short term parking stress;
- Accident records indicate that no school related accident has occurred in the last three years, and the increase in pedestrian and vehicle movements are unlikely to result in an increase in accidents;
- Promotion of demand management measures are proposed to mitigate parking demand, including staggering start and finish times between infant and junior schools, encouraging attendance at breakfast clubs and after school facilities and continuation of distance based admissions policy;
- Promotion of non car modes of travel and safety through the School Travel Plan.

Determining Issues

Principle of development

Lawful use of the land and loss of existing playing field / sports pitch

Location of development and impact on the Countryside beyond the Green Belt and landscape character

Highway and parking implications

Impact on visual amenity

Impact on residential amenity

Impact on Heritage Asset

Flooding Implications

Biodiversity and compliance with Habitat Regulations 2010

Accessibility and Equalities Act 2010, Crime and Disorder and Human Rights Implications

Environmental Impact Regulations 2011 (as amended)

Pre Commencement Conditions

Working in a positive/proactive manner

Planning Considerations

Principle of development

The site is located within the Countryside beyond the Green Belt, outside of any defined rural settlement boundary, where the countryside shall be protected for its intrinsic character and beauty. The NPPF states that as a core planning principle, the intrinsic character and beauty of the countryside shall be recognised.

In relation to the provision of educational establishments, the NPPF attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Great weight should be given to the need to create, expand or alter schools to meet the requirements of communities and to widen the choices available in education. Policy CF3 of the Local Plan states that proposals for new or additional educational establishments will be supported subject to their impact on the character of the area and their compliance with other relevant planning considerations.

Lawful use of the land and loss of existing playing field / sports pitch

The application site relates to land which is currently part of the wider playing fields for Glebelands Secondary School. Whilst it is noted that the proposal will seek to erect a large school building on a large part of the site, thereby reducing the extent of play fields, the remaining site would provide for an all purpose weather pitch.

It is noted that paragraph 74 of the NPPF notes that 'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.'

It is assumed that Sport England will be consulted on the application. It is also noted that Sport England's policy is to oppose any application which will result in the loss of playing field land unless it meets with one or more of their exception criteria. It is understood that the existing field upon which the development is proposed is an underutilised part of the school's playing fields, some distance from the existing school buildings and obscured from view by the Cranleigh Bowls Club. The main playing pitches are located to the east of the site, and proposed drainage improvements to the existing provisions would enhance the ability to use the existing facility. It is also noted that the site would be open to the wider community in terms of the sports facilities and sports hall.

The proposed all weather surface will contribute to the shortfall of junior pitches within the Borough. It is therefore considered that loss of the existing playing field would be replaced by a community facility, including the indoor hall and all weather artificial sports pitch which, together with the proposed drainage improvements to the retained Secondary School playing pitches, would outweigh the loss of the playing field in this instance.

Location of development and impact on the Countryside beyond the Green Belt and landscape character

The site is located within the Countryside beyond the Green Belt outside any defined settlement area. The NPPF states that, as a core planning principle, the intrinsic character and beauty of the countryside shall be recognised. Policy C2 of the Local Plan states that building in the countryside, away from existing settlements will be strictly controlled. The Government's White Paper "The Natural Choice: securing the value of nature" published June 2011 states that as a core objective, the planning system should take a strategic approach to guide development to the best location, to protect and improve the natural environment including our landscapes.

It is recognised however, that the site does not lie within an area designated for its higher level of landscape quality. Nevertheless the site is an area of open undeveloped land which helps to contribute to the semi rural setting of the village and the adjacent Conservation Area. Clearly the proposed development would alter the character of the immediate locality.

Notwithstanding the impact on the countryside however, it is acknowledged that the NPPF attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Great weight should be given to the need to create, expand or alter schools to meet the requirements of communities and to widen the choices available in education. Policy CF3 of the Local Plan states that proposals for new or additional educational establishments will be supported subject to their impact on the character of the area and their compliance with other relevant planning considerations.

Highway and parking implications

The NPPF outlines that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. In considering developments that generate significant amounts of movements, Local Authorities should seek to ensure they are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Plans and decisions should take account of whether improvements can be taken within the transport network that cost-effectively limits the significant impact of the development.

The NPPF states that development should be located and designed where practical to create safe and secure layouts which minimise conflicts between

traffic and pedestrians. Policy M4 of the Local Plan requires developments to include safe, convenient and attractively designed pedestrian routes linking to existing or proposed pedestrian networks, public open space, local facilities and amenities or, public transport.

With reference to car parking provision, the NPPF supports the adoption of local parking standards for both residential and non-residential development. The Council has adopted a Parking Guidelines Document which was prepared after the Surrey County Council Vehicular and Cycle Parking Guidance in January 2012. Development proposals should comply with the appropriate guidance as set out within these documents.

It is noted that the application has been accompanied by Transport Assessments and Travel Plans. Whilst the contents of the reports are noted, concern is expressed that the proposal seeks a considerable increase in pupil numbers of 210 school spaces, not including the proposed separate nursery, which does not appear to have been taken into account in the relevant surveys. The potential increase in traffic generated by proposed housing on the existing school sites has also not been taken into account, although it is acknowledged that there is no planning permission in place for such development.

The site lies immediately adjacent to a medium sized secondary school in an area where there is limited parking availability. Given the nature of the application and the fact that the surveys acknowledge that the majority of pupils and staff travel by car, and the fact that parents would not be able to drop children off but would in the large majority of cases need to park and take their children into school, serious concerns are expressed in relation to the parking stresses and conflicts which are likely to result. Car parks in the vicinity are also acknowledged to be pay and display car parks, even for short periods of time such that they would not offer a viable option for parents.

Whilst noting that the County Council's strategy actively seeks to restrict parking for parents and pupils to encourage more sustainable means of travel, in reality this is not always possible and the reliance on the car will be likely to continue. The parking implications are considered to be critical in this instance and whilst the Transport Assessment has concluded that the proposed development would not have a significant impact on the local highway network, the County Council is respectfully asked to ensure that the highway implication of the development and associated parking are fully assessed and views of the Highway Authority are taken into account.

Concern is expressed that the proposal underestimates the parking implications of the proposed development and the consequential implications

for existing residents, road junctions and the capacity of the High Street, with cars backing up at junctions.

It is also noted that the existing access from the School onto Parsonage Road is relatively narrow and has a right angle bend within it limiting views. Given the access to the school would be immediately adjacent to the access road it is unclear as to how the safety of children, in the volume proposed as the main entrance to the school would be secured.

In relation to the provision for cyclists, the NPPF states that in order to make the fullest possible use of cycling, development should be located and designed where practical to create safe and secure layouts which minimise conflicts between traffic and cyclists. Policy M5 of the Local Plan accords with the NPPF in requiring developments to include, where possible, safe and convenient cycle routes which can connect to the Borough-wide cycle network.

It is acknowledged that the proposal seeks to significantly increase the level of cycle parking spaces within the school. Whilst this is laudable, it is relevant to note that the proposal is for a junior school serving children aged 4 – 11 and as such it would realistically only be a small proportion of students that would be able to safely access the school by bike, particularly given the nature of the roads and the catchment of the school.

It would appear that there are only two entrances to the school, one from Parsonage Road and one from the footpath to the south of the site onto the Common. It is noted that this is relatively narrow in width and is bounded by residential garden fences. Concern is expressed that the footpath is narrow and would not have the capacity to accommodate the potential increase in pedestrian traffic. The width for example would cause issues for people with buggies or even young children on bikes to pass each other. It is noted that trees are also currently within the footpath. The footpath exits onto the Common where there is no available parking and concern is expressed that the use of this footpath may create problems of unauthorised parking on the Common, and the consequential implications for local residents.

It is understood that the school, through promotion in the School Travel Plan seeks to encourage alternative means of travel to the school, however given the catchment and the age of the children there will always be a large proportion of pupils which would travel by car as indicated by the parking surveys. Working parents are also unlikely to walk to school when time is of the essence.

It is also noted that the schools are proposing staggered hours, however for those parents with children at both parts of the school this would effectively extend the time required to pick up and drop off their children. It is also worthy of note that young children will often need to be delivered to and collected from classrooms and would not therefore be 'dropped off', thereby also extending the length of time that cars may be parked. The County Highway Authority is, therefore, respectfully asked to robustly examine the transport and parking implications of the scheme.

Concern is also expressed that the proposal has not taken into account the cumulative implications were the existing Glebelands site be at full capacity or expanded at some time in the future.

Furthermore, it is noted that some of the surveys were undertaken in the spring, where the weather and the amount of daylight is likely to be better than in the middle of the winter when it is more likely that more vehicle journeys will be made.

In view of the above and having taken into account the views of Local Members who have knowledge of existing traffic and parking pressures within the vicinity it is considered that strong concerns remain at the ability of the site to accommodate the scale of development proposed without adversely affecting the local highway network and the amenities of existing residents in relation to access, parking and associated disturbance and congestion.

Impact on Heritage Asset

Paragraph 128 of the NPPF states that 'Local Planning Authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made to their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'.

Paragraph 129 of the NPPF states that 'Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage assets conservation and any aspect of the proposal.

The NPPF defines 'significance' as the value of a heritage asset to this and future generations because of its heritage interest. That interest may be

historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Paragraphs 131 states that, 'in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness'.

Paragraph 132 states 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a Grade II listed building... should be exceptional'.

Paragraph 133 states that 'Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- The nature of the heritage asset prevents all reasonable uses of the site; and
- No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- Conservation by grant funding or some form of charitable or public ownership is demonstrably not possible; and
- The harm or loss is outweighed by the benefit of bringing the site back into use.

Paragraph 134 states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.'

The NPPG 2014 provides guidance under the Section titled 'Conserving and Enhancing the Historic Environment'. Whilst not a policy document, it does provide further general advice to policies in the NPPF.

Pursuant to the decision of the High Court in Barnwell Manor Wind Energy, the Decision Maker should give considerable importance and weight to the setting of the Listed Building. If the harm is found to be less than substantial, it does not follow that the S66 duty can be ignored, although this would lessen the strength of the presumption against the grant of planning permission.

Pursuant to the decision of the Court of Appeal in Forge Field Society, the finding of harm to the setting of a Listed Building or a Conservation Area gives rise to a strong presumption against planning permission being granted. If harm is identified then the decision maker should acknowledge that there is a presumption against permission.

In this instance the designated Heritage Asset is the Cranleigh Conservation Area. Cranleigh Conservation Area is split into 6 distinct character areas, of which the adjacent Conservation Area is called the Common (north). This area is characterised by the large area of open space surrounded by dwellings constructed in the Surrey vernacular, of a variety of sizes and scale. The area is also characterised by the Lime trees that line The Common.

It is expected that the County Council will take into account and fully assess the impact of the proposed development on the adjacent Conservation Area.

Impact on visual amenity

The NPPF attaches great importance to the design of the built environment as a key part of sustainable development. Although planning policies and decisions should not attempt to impose architectural styles or particular tastes, they should seek to promote or reinforce local distinctiveness. Policies D1 and D4 of the Local Plan 2002 accord with the NPPF in requiring development to have high quality design and to be well related in size, scale and character to its surroundings.

The proposed development would have a significant impact on the visual amenities of the area given that the site is currently undeveloped and an open playing field. Whilst the proposed building is orientated in a north / south direction to minimise the potential impact on local residents, it would nevertheless have a significant presence. Whilst it is appreciated that the building is relatively functional in its appearance, the inclusion of a very shallow pitch roof keeps the overall height down. The building however does

not reflect local distinctiveness and it is considered that the design of the buildings could be improved.

Notwithstanding this concern it is appreciated that the building would functionally relate to the site and would keep the proposed built form close to the existing Bowls Club.

Impact on residential amenity

The NPPF identifies that within the overarching roles that the planning system ought to play, a set of core land use planning principles should underpin both plan-making and decision making. These 12 principles include that planning should seek to secure a good standard of amenity for all existing and future occupants of land and buildings. These principles are supported by Policies D1 and D4 of the Local Plan and guidance contained within the Council's SPD for Residential Extensions.

Residential properties lie immediately to the south of the proposed site, and within Parsonage Road adjacent to the proposed new access road. Given the proximity of the proposal to existing properties, and the resultant increase in pedestrian movements along the boundaries of existing properties it is envisaged that the proposal would have a direct impact on the amenities of those neighbours. Currently the land to the rear of properties fronting the Common are open undeveloped playing fields, and it is noted that due to the distance from the main school buildings, these are not particularly well used areas of the existing school. Therefore the proposal to erect a large, two storey building capable of accommodating some 540 pupils and 47 staff would have an impact on the amenities of these residents. Furthermore the increased traffic and pedestrian movements to and from the site and the implications on the surrounding road network and the adjacent footpaths, needs to be fully considered in determining the application.

It is noted that the proposed building has been orientated in a north / south direction to minimise the impact of the built form and any degree of overlooking of adjacent residents, although the proposed staff car parking area would be closest to the neighbours and all access to the school, other than staff in vehicles, would be directed along the footpath immediately adjacent to existing gardens. It is also noted that the proposal seeks to erect close board fencing to assist in protecting the amenities of existing residents. It is expected that the County will fully assess the noise implications of the proposed development on local residents.

As indicated above, it is also anticipated that local amenities may be adversely affected in terms of parking and increased congestion in the

immediate road network. Due consideration should also be given to the hours of operation outside of school hours and any implications for external lighting in terms of footpaths, car parks and all weather pitches and the disturbance that this may cause.

Flooding Implications

Paragraph 103 of the NPPF states that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, it should be made safe without increasing flood risk elsewhere. Development should only be considered appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

- within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; and
- development is appropriately flood resilient and resistant.

In a Written Ministerial Statement on the 18th December 2014, the Secretary of State for Communities and Local Government set out the Government's expectation that sustainable drainage systems (SuDS) will be provided in new developments, wherever this is appropriate.

Decisions on planning applications relating to major developments should ensure that SuDS for the management of run-off are put in place, unless demonstrated to be inappropriate. Under these arrangements, local planning authorities should consult the relevant Lead Local Flood Authority (LLFA) on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The SuDS should be designed to ensure that the maintenance and operation requirements are economically proportionate. This policy came into effect on the 6th April 2015 and from the 15th April 2015, the LLFA in respect of surface water drainage and SuDS will be Surrey County Council.

The NPPG states that whether SuDS should be considered will depend on the proposed development and its location, for example where there are concerns about flooding. SuDS may not be practicable for some forms of development. New development should only be considered appropriate in areas at risk of

flooding if priority has been given to the use of SuDS. When considering major development, SuDS should be provided unless demonstrated to be inappropriate. Whether a SuDS system is appropriate to a particular development proposal is a matter of judgement for the Local Planning Authority and advice should be sought from relevant flood risk management bodies, principally the LLFA.

The Department for Environment, Food and Rural Affairs (DEFRA) has published non-technical standards for SuDS (March 2015) which will be taken into account by the LLFA and local planning authorities in assessing the acceptability of SuDS schemes.

It is assumed that the views of colleagues responsible as the Lead Local Flood Authority and the views of the Environment Agency will be taken fully into account, particularly given that part of the site lies within Flood Zones 2 and 3. It is further noted however that local residents have also indicated that there is a potential for other parts of the site to flood and this should also be taken into account.

Tree Implications

The NPPF states that planning permission should be refused for development resulting in the loss or deterioration of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development clearly outweigh the loss. Policies D6 and D7 broadly support the aims of the NPPF stating that the Council will protect significant trees and groups of trees and hedgerows through planning control.

It is noted that there are some large trees and well established trees within the site, which are not only important from within the site but also form part of the backdrop to the setting of the Conservation Area and help to create the semi rural character of the locality. In determining the application, the views and consideration of the Council's own tree and landscape officers should be taken fully into account.

Biodiversity and compliance with Habitat Regulations 2010

The NPPF requires that when determining planning application, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately

mitigated, or, as a last resort, compensated for then planning permission should be refused.

In addition, Circular 06/2005 states 'It is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before planning permission is granted.'

The application property does not fall within a designated SPA, SAC, SNCI or SSSI. It is not within 200m of ancient woodland although it is close to a water course with a stream running to the north of the site. Having regard to this, it is recommended that full account is taken of the views of the Surrey Wildlife Trust and Natural England.

Accessibility and Equalities Act 2010, Crime and Disorder and Human Rights Implications

The County Council shall ensure that full account is taken of the need for the building to be readily accessible to all, particularly given that the proposal would be open to the public out of school hours.

Environmental Impact Regulations 2011 (as amended)

The proposal is considered not to be EIA development under either Schedule 1 or 2 of the EIA Impact Regulations 2011 (as amended) or a variation/amendment of a previous EIA development nor taken in conjunction with other development that is likely to have a significant environmental effect.

Conclusion

Whilst the principle of a new school is fully appreciated and understood, serious concerns are raised in relation to the highway safety and parking implications in what is already a restricted area with limited available parking provision. The Borough Council would ask that the highway access and parking issues are fully and robustly examined to ensure that the amenities of the area and highway safety is protected.

In view of the above the County Council be advised that serious concerns are raised in relation to the proposed access and parking implications in the vicinity.

Case Officer

Signed: Jo Dawes Date: 6th June 2017

Agreed by Team or DC Manager.....Date:.....

Time extension agreement in writing seen by signing off officer:

Yes ☐ No ☐ N/A ☐

For Certificate of Lawfulness applications: Use/Operations/Matter

Agreed by Legal services.....Date.....

Agreed by Development Control Manager or Head of Planning Services
.....

This report has been agreed under the delegated authority by the Head of Planning Services.

Decision falls within(*number reference*) of the Scheme of Delegation
..... (initialled by Authorising officer)

Copy to Policy for SPA or infrastructure contributions?

Pass File to Enforcement

Is there an extant Enforcement Notice in place for the same or similar development served no more than 2 years previously?

Does this application need to be referred to the Secretary of State in line with Town and Country Planning (Consultation) Direction 2009?

Notify Environmental Health Team of decision (send copy)

Is this subject to a legal agreement?

If yes, is there a signed copy on file?

Notify Legal Services of decision if approval and if subject to legal agreement (send copy)

FAO
County Planning Officer
Surrey County Council
County Hall
KINGSTON-UPON-THAMES
Surrey
KT1 2DT

Elizabeth Sims
Head of Planning Services

Our ref: Plan/Stan/SCC3

When calling please ask for:

Nicola Martin

Direct line: 01483 523427

Calls may be recorded for training or monitoring

Date: 18 January 2019

Dear Sir

TOWN AND COUNTRY PLANNING ACT 1990 - WA/2018/2044

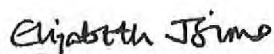
Consultation under Regulation 3 for construction of a two and single storey building with associated car parking provision, landscaping, all-weather sports pitch and new access from Parsonage Road to provide a replacement for Cranleigh Primary School with capacity of two forms of entry at Infant stage and three forms of entry at Junior stage on a single site currently forming part of Glebelands School playing field. Glebelands School, Parsonage Road, Cranleigh,

The above application was considered by the Council under the delegated powers of the Head of Planning, when it was decided that an objection be made subject to the following:-

Whilst the principle of a new school is fully appreciated and understood, serious concerns are raised in relation to the highway safety and parking implications in what is already a restricted area with limited available parking provision. The Borough Council would ask that the highway access and parking issues are fully and robustly examined to ensure that the amenities of the area and highway safety is protected.

In view of the above, the County Council be advised that serious concerns are raised in relation to the proposed access and parking implications in the vicinity.

Yours faithfully



Elizabeth Sims
Head of Planning Services



E-MAIL FROM CRANLEIGH PARISH COUNCIL

To: Planning Team
Position: Planning Technician, Eastern Area Development Control
Organisation: Waverley Borough Council
E-mail: planconsult@waverley.gov.uk
From: Louise Glazier

45, The Mount, Cranleigh, Surrey, GU6 7LU

WA/18/2041 Erection of extensions and alterations to roof including installation of roof lights.

NO OBJECTION.

WA/18/2044 **Glebelands School, Parsonage Road, Cranleigh, Surrey, GU6 7AN**
Consultation under Regulation 3 for construction of a two and single storey building with associated car parking provision, landscaping, all-weather sports pitch and new access from Parsonage Road to provide a replacement for Cranleigh Primary School with capacity of two forms of entry at Infant stage and three forms of entry at Junior stage on a single site currently forming part of Glebelands School playing field.

OBJECTION – Members agreed to repeat the points sent to SCC that was discussed and agreed at the Cranleigh Parish Council Meeting.

- The existing site was best placed for an expanded school.
- The access road was restricted and not appropriate for the traffic generated by a school of this size.
- No extra parking was being provided.
- There is no drop off/collection point.
- The plans allocate places for nearly double the number of pupils which will result in extra traffic.
- There will be additional traffic movements from the houses built on the existing primary school sites.
- The height of the school building had increased significantly and would be very prominent. It is over bearing and would result in overlooking of neighbouring properties.
- The risk of flooding on the site and cumulative impact off site.
- Loss of amenity for neighbouring properties.
- Noise from the site.
- Loss of school playing field for Glebelands which is forecast to increase in size due to significant local development.
- Impact on residents of Rowland Road and the high likelihood of parking on adjacent grassed areas which would need to be protected.
- Impact on the Common and Conservation Area of traffic movements, especially those using the alleyway from the High Street as a short cut to the site.
- The impact of the movement in this concentrated area of large numbers of people 2 times per day five days a week.

- Plans do not include for additional housing in Dunsfold and potential extra pupils at Glebelands School and resulting additional traffic movements.
- Impact on traffic movements to and from St Cuthbert Mayne School also should be considered.
- Concentrating parking in one area as opposed to the two school sites which currently disperses parking more evenly.
- Reduced parking due to new development.
- The Planning Statement including Statement of Community Involvement Nov 2018 Point 3.5 is incorrect," *The school bus, coach and car drop off would not take place within the application site but would take place on the existing lay-by bays along Parsonage Road, mirroring the arrangements currently used for the existing Cranleigh Primary School.*"
The proposed arrangements do not mirror the current arrangements as people currently park in the Church Lane car park to drop off at the infant school, which will no longer be available and there will also be some reduction of the parking bays due to the residential development on the junior school site. This statement glosses over the pressure from an increase in cars from significantly increased pupil numbers which this reduced parking arrangement is expected to accommodate in an extremely small area which will have additional pressure from an increase in pupil numbers at Glebelands School as well.
- Cranleigh is in a rural location and our schools draw pupils from a wide catchment, where it is recognised the use of the car is high.
- Of paramount importance is the safety of our children and being able to access their school safely.

WA/18/2054 19 Treleaver, Smithwood Avenue, Cranleigh, Surrey, GU6 8PS

Erection of an extension following demolition of existing extension.

NO OBJECTION.

WA/18/2055 7 Morels, Rowly Edge, Cranleigh, Surrey, GU6 8PU

Erection of single storey extensions and alterations to garage door.

NO OBJECTION.

WA/18/2071 Land South Of High Street Between Alfold Road And, Knowle Lane, Surrey

Approval of reserved matters for phase 2.2 for the erection of 130 dwellings with associated access, parking, drainage and landscaping works following the outline approval WA/2016/1625 for the erection of 425 dwellings. This is a subsequent application under the EIA Regulations and is accompanied by a statement of conformity (revision of WA/2017/2391)

OBJECTION – Members noted that the room sizes have been upped to National Standards. Members agreed to repeat their previous comments:

Members agreed that it appears the overall flood risk strategy for the site is no longer being followed, as given in the outline permission, bearing this in mind this area is the most vulnerable to flooding.

The term *broadly in accordance with recommendation of the approved outline flood risk assessment reference 50600576* is of great concern to the Parish Council, bearing in mind this area of the total development is the most vulnerable to flooding.

Members would like clarification on the height the land would be increased to, as suggested on page 2 of the drainage report.

In addition, the developers have seen fit to encroach on the tree RPA's, when there is so much land available for development.

WA/18/2074 Land Centred Coordinates 504755 139827 East Side, Guildford Road, Surrey

Erection of 40 dwellings (including 14 affordable dwellings) with new vehicular accesses and associated works.

OBJECTION – Members agreed this application is premature as the adopted WBC Local Plan Part 1 has met the short-term need for housing, so there is no need for more developments to be approved.

DW/18/0042 Aston, Woodlands Close, Cranleigh, Surrey, GU6 7HP

The erection of a single storey rear extension which would extend beyond the rear wall of the original house by 2.37M for which the height would be 3.63M and for which the height of the eaves would be 2.63M.

NO OBJECTION.

WA/18/2090 1, Cox Way, Cranleigh, Surrey, GU6 7FZ

Erection of a conservatory.

NO OBJECTION.

WA/18/2053 2, Mount Road, Cranleigh, Surrey, GU6 7LT

Certificate of lawfulness under section 192 for erection of dormer extension and alterations to roof to provide habitable accommodation.

It was agreed to consider application WA/18/2053 at this point in the meeting.

(One declaration of interest - Cllr B Freeston left the meeting)

NO OBJECTION.

WA/18/2096 2, Mount Road, Cranleigh, Surrey, GU6 7LT

Erection of a single storey extension following demolition of existing single storey extension.

(One declaration of interest)

OBJECTION – Members questioned if the proposed extension contravened the 45% rule with respect to windows in the neighbouring property. Due to the pitched angle of the proposed roof there would be a loss of light to the neighbouring property, which would cause a loss of amenity to the neighbouring property, making the proposed extension overbearing and dominant.

(Cllr B Freeston returned to the meeting)

NMA/18/0157 Land Comprising Of 5 Fields South Of, Amlets Lane, Surrey

Amendment to wa/2017/1362 for a change to plot 118 & moving substation.

NOTED.

WA/18/2078 11, Manfield Park, Cranleigh, Surrey, GU6 8NU

Change of use to class B8 (storage or distribution) together with associated external alterations.

NO OBJECTION.



APPENDIX C

Ordnance Survey® information.
© Crown copyright. All rights reserved.
Licence number AR100007392

Amlets Lane, CRANLEIGH

- KEY
- TPO Trees
 - Highway Boundary
 - Site Boundary



CLIENT		SITE CONSTRAINTS		FEASIBILITY CONSTRAINTS		NORTH		REV.		DESCRIPTION		DATE		INITIALS		PROJECT		DRAWING	
FARMLAND CRANLEIGH LTD.																Land South of Amlets Lane Cranleigh, GU6 7DH		Existing Site Plan	
																		DATE	
																		Sept. 2016	
																		DRAWN	
																		MRA	
																		CHECKED	
																		CHQ.16.12064-01	



APPENDIX D

Cranleigh Neighbourhood Plan site assessments

N25 Land to south of Amlets Lane



1. Background information

Site location and use	
Site location	Land to south of Amlets Lane, GU6 7DH
Gross area (ha)	1.21 ha
SHLAA site ref (if applicable)	

Context	
Surrounding land uses	Green belt beyond Amlets Lane, mainly fields, some scattered larger housing
Is the site: <u>Greenfield</u> <u>Brownfield</u> <u>Mixture</u> <u>N/K</u>	<u>Greenfield</u>
Existing/previous use	Greenfield land
Site planning history <i>Have there been any previous applications for development on this land? What was the outcome?</i>	Whilst no applications submitted, the site has been the subject of pre-application discussions with planning officers in 2016 and 2017 – the site promoter is planning to submit site based on the lack of 5-year land supply at Waverley.

2. Availability

Availability		
	Yes/No	Comments
Is the site landowner(s) willing to submit the site for development (if known)? <i>If the site is not available for development, then do not proceed with the rest of the assessment</i>	Yes	Landowner is the sole owner of the site
Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners?	No	
Is there a known timeframe for availability?		Within five years

3. Suitability

Suitability			
Where is the site located in relation to the built-up area of the nearest settlement?	Clearly outside the settlement		
What is the size of the nearest settlement?	A main centre	Cranleigh Village	
How would development of this site relate to the surrounding uses?	Neutral	The site is surrounded by green fields and poorly located to the village. There is, however, a new housing development currently being constructed to the east/south east of the site and this site would adjoin that.	
How is the site currently accessed? Is it accessible from the highway network? Can the network support the potential level of traffic that would be created?	A new vehicular/ pedestrian access would be required to be provided off Amlets Lane. The site promoter has undertaken an initial review which demonstrates that a priority T-junction can be taken from Amlets Lane. This would allow adequate junction spacing together with the required visibility splays. There is a development by Cala Homes in the process of being constructed to the east/south east of the site also accessed off Amlets Lane. It will be necessary to engage with Surrey CC Highways Team to determine whether the volume of traffic that the site will produce can be supported by the network.		
Pedestrian accessibility to High Street?	The site is remote from the High Street. There are no pavements along Amlets Lane, which is a narrow rural road (national speed limit). There is an existing footpath that runs along the eastern boundary of the site but which falls outside the site itself. This footpath connects to the village.		
Environmental considerations			
What is the distance from the edge of the site to any of the following:	Distance	Comments	

Sites designated as being of European importance ¹	<u>>800m</u>	12,180m
Sites designated as being of national importance ²	<u>>800m</u>	4631m
Sites designated as being of local importance ³	<u>400m-800m</u>	591m

Community facilities and services		
What is the distance to the following facilities (measured from the site centre):	Distance	Observations and Comments
Village / local centre / shop	<u>>800m</u>	1,044m
Public transport (with at least a half hourly service during the day)	<u>400m-800m</u>	479m
School(s)	<u>>800m</u>	Primary - 938m Secondary – 960m
Health centre facility	<u>>800m</u>	1.268m
Open space/ recreation/play facilities	<u><400m</u>	368m
Does the site have the potential to provide additional open space/recreation/ community facilities?	<u>No – site is poorly located and too small</u>	The site is remote from the village and is too small to provide additional facilities to benefit the wider community.

Historical considerations		
Proximity of site to the following sites/areas:	Proximity	Comments
Archaeological sites	<u>Site is not on or adjacent to an archaeological site</u>	
Scheduled ancient monuments (SAMs)	<u>Site is not on or adjacent to a SAM</u>	
Listed buildings	<u>Site does not contain or adjoin a listed building</u>	
Conservation Area	<u>Site is not adjacent to or within the setting of a Conservation Area</u>	

¹ Special Areas of Conservation, Special Protection Areas, Ramsar sites

² Sites of Special Scientific Interest, Ancient Woodland

³ Local Nature Reserves, Sites of Nature Conservation Importance

Other key considerations		
		Comments
What proportion of site is in fluvial flood risk zone 3 (highest risk)?	<u><25%</u>	0%
What proportion of site is in fluvial flood risk zone 2 (medium risk)?	<u><25%</u>	0%
Is the site at risk of surface water flooding?	No	No
What proportion of site is Grade 1 or 2 (highest value) agricultural land?	<u><25%</u>	0%
What proportion of site is Grade 3 (valuable) agricultural land?	<u>25%</u>	100%
Significant infrastructure crossing the site, i.e. power lines, pipelines?	No	None
Impact on Public Rights of Way (PROWs)	<u>None</u>	None

Physical characteristics	
Characteristics which may affect development on the site	Comments
Topography <i>Flat/plateau/steep gradient</i>	Flat
Landscape impact <i>Would development harm landscape character or setting?</i>	Amlets Lane is fairly narrow and very rural in character. The Green Belt boundary lies to the north of the Lane and there could be visual impact from the north. There is, however, a new housing development to the east/south east, which adjoins the settlement boundary and could unlock this area for development. Access to the site, however, is off the narrow, rural Amlets Lane.

Other considerations		
Extent to which the site contributes towards other Neighbourhood Plan objectives		Comments
Will the site generate a significant amount of additional traffic travelling through the High Street?	<u>Possibly</u>	Whilst there is a footpath that leads to the village centre, it is likely that the majority of movements to the village centre will be by car because of the remoteness of the site. With 9 dwellings proposed, this could represent at least two cars per dwelling, meaning that the site might generate an additional 18 cars.
Does the site have the potential to provide improved public parking to serve Cranleigh village?	<u>No potential and poorly located</u>	The site is too remote from the village centre and does not have sufficient space.

Does the site have the potential to support commercial activities, including start-ups?	<u>No potential and no support by site promoter</u>	The site is poorly located and proposed purely for residential use.
---	--	---

4. Summary

Conclusions	
Site number/name:	N25, Land to south of Amlets Lane, Cranleigh
<i>Please tick a box</i>	
The site is appropriate for development	<input type="checkbox"/>
The site has minor constraints	<input type="checkbox"/>
The site has significant constraints	<input checked="" type="checkbox"/>
The site is unsuitable for development	<input type="checkbox"/>
Potential housing development capacity (estimated as a development of 30 dwellings per hectare)	9 dwellings of which: 4x 4-bedroom 4 x 3-bedroom 1 x 3-bedroom
Estimated development timeframe	Within 1 year
Explanation/justification for decision to put forward site for consideration as a sustainable option	The site is remote from the village boundary and bounded to the north by Green Belt. It does however now adjoin a new development, which might enable its development to be more viable although the highway capacity would need to be determined with Surrey County Council.
Infrastructure requirements? <i>e.g. highways, water, education</i> All utilities infrastructure would need to be provided to serve the site.	
Other issues? None	



APPENDIX E




Amlets Lane, CRANLEIGH

Application Site Area	1.35Ha
-----------------------	--------

Proposed Units
2no. 2 Bed Houses
4no. 3 Bed Houses
4no. 4 Bed Houses

Total 10 no. Units



CLIENT FARMLAND CRANLEIGH LTD.			<div>NORTH</div> 	REV.	DESCRIPTION	DATE	INITIALS	<div> CHQ Architects Ltd The Millings, 44 Whitehorse Street, Baldock, Hertfordshire SG7 6QQ Telephone: (01462) 895110 Email: design@chq-architects.co.uk www.chq-architects.co.uk</div> 	PROJECT Land South of Amlets Lane Cranleigh, GU6 7DH	DRAWING Proposed Site Plan	
				ISSUE	PLANNING	DATE April 2017				DRAWN MRA	
						SCALE 1:1000@A3				CHECKED	
						CHQ.16.12064-PL03					
GENERAL NOTES All drawings are subject to full site survey. All dimensions are to be checked on site.		SCALE 