

From: [Hannah Pearce](#)
To: [Michael Eastham](#)
Cc: [Nathan Turner](#)
Subject: Cranleigh - planning application ref: WA/2023/00294 - response to consultee comments from Housing Officer (re: affordable housing), Manorwood (re: Heritage) and Bellamy Roberts (re: Highways) [Filed 17 May 2023 16:58]
Date: 17 May 2023 16:58:21
Attachments: [Neighbour Response - Heritage - Manorwood \(object\).PDF](#)
[Neighbour Response - Bellamy Roberts LLP - Highway & Transportation Report \(March 2023\).pdf.PDF](#)
[WBC Affordable housing comments.pdf](#)
[Response on behalf of the applicant to Bellamy Roberts Highways Report - prepared by Motion - dated 9 May 2023.pdf](#)
[Response on behalf of the applicant to Manorwood Heritage Report - prepared by RPS - dated 11 May 2023.pdf](#)
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[image003.png](#)
[image005.png](#)
[image007.jpg](#)

Afternoon Michael,

Further to Rachel's recent email, we understand that you are the assigned case officer for the above planning application, and would be grateful for a meeting in the short term, where it would be useful to update you with regards some of the points raised by consultees to date.

In particular, it would be helpful to discuss the comments submitted by Surrey Wildlife Trust, where we have previously provided a rebuttal and have received their further comments following. As a team, we have also reviewed the comments from the Tree Officer, and intend to provide you with a response to that in due course. In the meantime, we suggest it would be helpful for the arboriculturalist acting on behalf of the applicant (Dr Richard Curtis of Aspect Arboriculture) to speak with your Tree Officer – unless you have any reservations of the same? Could you also advise when you anticipate receiving comments from your landscape consultant, which I believe is the only outstanding matter as far as stat consultee comments are concerned?

In the meantime, and as promised to Rachel, we set out below our collated response to those comments received from Bellamy Roberts (in their report entitled Highway & Transportation considerations, dated March 2023, and lodged on behalf of the Knowle Lane Neighbourhood Group), Manorwood (in their report entitled Heritage Impact Assessment and dated April 2023 – also lodged on behalf of local residents) and your Council's Housing Officer (regarding affordable housing matters). All of these are attached for ease of reference.

Accordingly, we respond to each of these matters as follows:

Affordable Housing

The Housing Officer suggests that the affordable housing mix and tenure is an 'in-principle' issue, and a full accommodation schedule has therefore been requested. A recommended mix and tenure has been provided by your Officer, covering first homes, social & affordable rent and shared ownership.

As an applicant team, we would note that the application has been made in outline form – where only access is included for assessment, with the layout of the proposed development to be assessed through reserved matters, at a later date. Accordingly, the proposed layout

plan lodged with the planning application is submitted for illustrative purposes only. Notwithstanding, it has been confirmed in the Planning Statement (and included within the description for development), that the proposal will include 30% of the dwellings as affordable, which is in line with policy requirements – whilst that is an in-principle matter for assessment at this stage, we do not agree that the details of the affordable housing split (in terms of mix and tenure) is an in-principle matter that needs to be determined and assessed at this stage.

It is the intention of the applicant that the exact unit mix and type will be determined at the reserved matters stage, when the proposed layout plans are confirmed and put forward for approval. Indeed, where the layout plans and drawings accompanying the application are indicative only, and the exact quantum of development is to be confirmed (with the description providing for 'up to' 162 dwellings), it would be inappropriate at this stage to provide (and assess) a full accommodation schedule, where such details are unknown.

As noted in the Housing Officers response, planning policy requires the mix of dwelling types, sizes and tenure split to reflect the type of housing identified in the most up to date evidence (where this is currently noted as being the 2021 Housing Affordability Study). That evidence is already up to two years out of date, and – where any outline planning permission would likely be subject to the usual timescales for submission of reserved matters (usually no later than three years from the date of approval of the outline) and implementation (usually no later than two years from the date of approval of the last reserved matters approved) thereafter, it might well be that the proposal is not delivered for another 5 years.

The applicant suggests that it would be more appropriate for the mix and tenure of the affordable housing to be finalised and assessed for appropriateness nearer to the point of delivery of the houses, which would likely coincide with the reserved matters application(s) – and where that mix would provide for the prevailing housing needs at that time. In the meantime, the applicant appreciates the need to provide for some certainty at this stage – but suggests that this can be achieved through a section 106 obligation that requires the submission and approval of an Affordable Housing Scheme – where it is anticipated that this would include for a requirement to provide an accommodation schedule, a site tenure plan and floor plans of the proposed affordable dwellings. The applicant confirms that they would be willing to accept such a planning obligation (which could also define a 30% provision) to any section 106 Agreement pertaining to an approval.

Heritage

The conclusions of the Manorwood report suggest that the proposed development will result in substantial harm to the setting of designated assets comprising Coldharbour Farm and less than substantial harm to the non-designated heritage asset of Redhurst. It is suggested that the special interest of the heritage assets will not be preserved or enhanced.

The heritage consultant acting on behalf of the applicant, RPS Consulting Services, has considered these representations and provided a response to the matters raised (dated 11th May 2023), as attached. That rebuttal letter should be read alongside and in conjunction with the Heritage Statement dated January 2023, prepared by RPS.

In the rebuttal letter, RPS note that:

- The Manorwood report includes factual errors (including the status of Redhurst / Craneswood as a building of merit, and the incorrect application of the superseded

- guidance to inform their assessment of the relevant heritage asset's significance).
- On Redhurst, it is noted that this is not identified by any plan-making or non-plan-making body as a non-designated heritage asset.
 - The report grossly overstates the contribution of the site, as a portion of the assets' wider setting, to the three designated heritage assets' significance.
 - Consequently, Manorwood wrongly concludes that the proposed development will cause a substantial level of harm to the assets' significance. This is a profoundly overinflated conclusion to draw (on the proposed development's level of impact to the historic built environment).
 - It is reiterated that RPS's Heritage Statement correctly concludes that the proposed development will cause no higher than a low level of harm within the spectrum of less than substantial harm.
 - Consequently (and in line with paragraph 202 of the NPPF) the harm to the significance of the three designated heritage assets should be weighed against the public benefits of the proposed development – which have been set out by the applicant in its submissions elsewhere, and are not reiterated here.
 - Overall, clear and convincing justification for this less than substantial level of harm has been provided.
 - By contrast, the flawed analysis and grossly inflated conclusion (in regard to the alleged level of built heritage harm) set out in the Manorwood report does not accurately inform this case and, as such, we suggest this should be rejected by the Council in its assessment (and ultimate decision) of the planning application.

Highways

The conclusions of the Bellamy Roberts report suggests that the proposed development will fail to achieve appropriate visibility for northbound traffic on Knowle Lane (where it is suggested that incorrect 85th percentile speeds have been applied). It also suggests that the capacity analysis at Knowle Lane and the High Street junction was not validated and the proposal will have a server impact on the network, causing traffic delay. We note that there are other comments lodged by third parties raising similar concerns.

The transportation consultant acting on behalf of the applicant, Motion, has considered these representations and provided a response to the matters raised (dated 9th May 2023), as attached. That rebuttal letter should be read alongside and in conjunction with the Transport Assessment and Travel plan dated January 2023, prepared by Motion.

In that response, Motion note that:

- Regarding highway safety and the provision of suitable visibility splays, the correct speed survey data has been provided, which confirms that the SSD calculations set out in the submitted Transport Assessment are correct.
- It is important to note that the County Highways Authority has raised no objections to the application (in this respect or otherwise).
- Regarding the impact on the local highway network, the modelling presented within the submitted Transport Assessment has been validated against queue length surveys.
- By contrast, the analysis presented by Bellamy Roberts of the Knowle Lane / High Street junction does not appear to be based on queue length surveys carried out by

an independent traffic surveillance company, and is therefore misleading.

- Again, it is noted that the capacity assessment of this junction has been considered by the County Highway Authority and no concerns have been raised.
- Overall, it is therefore considered the conclusions of the submitted Transport Assessment remain appropriate, and (in relation to the NPPF), that the proposals would not have an unacceptable impact on highway safety.
- Similarly, the impact on the local highway network would not be 'severe'.

We look forward to discussing the application further with you in due course. In the meantime, we trust that the attached and above is useful in providing our response and for your consideration of the proposals.

Kind regards

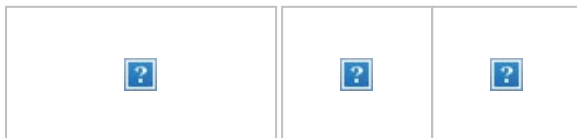
Hannah

Hannah Pearce

Director
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Please note that I work flexibly Monday to Thursday (and do not work on Fridays). I am available for meetings Monday, Wednesday and Thursday – between 9:30am and 5:30pm.



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