

Mrs Joanna Cadman,
Ewhurst Parish Council,
Rumbeams Cottage,
Ewhurst Green,
Nr Cranleigh,
Surrey,
GU6 7RR

17 June 2019

Dear Mrs Joanna Cadman,

Ewhurst and Ellen's Green Neighbourhood Plan

Please find the attached assessment of Shrimplin Brown Site Assessment Report and updated Strategic Environmental Assessment (SEA).

This is following an email received on 28.05.19 from Ian Davis of the Ewhurst and Ellen's Green Neighbourhood Plan Steering Group to undertake the following piece of work:

Housing Land Availability Assessment (HLAA)

- Having regard to the Site Suitability tests of Appendix 1, review the detailed site assessments of Appendix 5. Specifically, could you please review the summary of each site assessment against the criteria of Suitability, Availability and Achievability and draw a conclusion.

Strategic Environmental Assessment (SEA)

- To harmonise the Site Analyses and numerical references with those of the HLAA in order that the site reference numbers and the order of presentation both match.

The above work has been undertaken on the basis of the site assessment criteria (set out in Appendix 1 of the HLAA) and the information provided in the HLAA. A detailed fact checking exercise has not been undertaken, however, any known issues have been identified as applicable.

Please let me know if you require any further information or want to discuss any of the advice given.

Regards,
James Garside

Director

Housing Land Availability Assessment Review

Background

The Waverley Borough Local Plan (2018) identifies a housing target of 100 net additional homes for Ewhurst village between 2013-2032. Some developments have already been granted planning permission and it is understood that this amounts to a total of 115 dwellings which exceeds the requirement set out in the Local Plan. It is recommended that the Steering Group make contact with the Borough Council to determine whether or not further allocations are required through the Neighbourhood Plan to be in general conformity with policy ALH1 of the Local Plan.

Housing Land Availability Assessment (HLAA)

In supporting sustainable development, national planning guidance requires Neighbourhood Plans to carry out a thorough assessment of possible development against clearly identified criteria. In doing so, the Parish Council appointed Shrimplin Brown, a planning and development company, to undertake a Housing Land Availability Assessment (HLAA) to identify and assess possible sites.

In line with Government guidance, the HLAA assessed the deliverability of sites, considering whether they are **suitable**, **available** and **achievable**.

Suitable – *is the site suitable for the development proposed?*

A site is considered suitable if there are no insurmountable physical or environmental factors, taking into account mitigation which might overcome such issues. This may include infrastructure, flood risk, contamination, impacts on environmental sites, vehicle and pedestrian access, accessibility to local services, public transport etc.

Available – *Is the site available for development?*

A site is considered available if the landowner or developer is willing to sell or develop the site at a known point in the future and during the plan period.

Achievable – *Is the site economically viable?*

A site is considered achievable if demonstrated that it is economically viable and where there is a reasonable prospect that the site will be developed for the proposed land use within the plan period.

Methodology

The HLAA firstly identified a pool of possible development sites across the entire parish. A number of sites were initially excluded from the process, for example, sites being less than 0.2 Ha in size, further than 100m from the village settlement boundary, or located in Flood Zone 3 or a protected habitat.

Secondly, site assessment criteria identified by the Parish Council following a consultation with residents were used to assess the **suitability** of sites. The list of criteria (pages 15 - 19) covers the three strands of sustainability (environmental, social and economic), ensuring that the process was thorough and aligned with Government guidance.

The HLAA includes key details of individual sites (i.e. site boundary identified on a map, constraints to development, when the site is available for development and the planning history) and includes a detailed assessment of each site against the suitability criteria. The assessment also considers the potential number of units that could be accommodated on the site, with reference to the density of the surrounding area.

Conclusions

3 sites were concluded in the HLAA as having the potential for development, the reason for which is given below:

- **Land at Sixpenny Buckle, Gransden Close - 4 net additional dwellings**

Suitable - The site is within the settlement boundary and, following the construction of the development at Backward Point, will be entirely enclosed by residential development. It is close to the centre of the village and its amenities.

Available – the site is actively being promoted for development

Achievable - No constraints to development noted

- **Thornhurst Brook Farm, The Street, Ewhurst (south eastern part of site) - 23 net additional dwellings**

Suitable - The south-eastern part of the site is enclosed by residential development to north and east with the recreation ground to south. It is well related to the settlement boundary. The site is viewed within the village context.

Available – Question mark over availability but, since the publication of the report, the landowner has sought to actively promote the site for development.

Achievable – Question mark over suitability of narrow access lane.

- **11 West View, Wykehurst Lane, Ewhurst (eastern site) - 15 net additional dwellings**

Suitable - The eastern site has an (semi) urban character being enclosed by residential development to the north and east and residential gardens to the south and west. It is well related to the village settlement boundary.

Available – Submitted to the Parish Council as a possible development site.

Achievable - Question mark over suitability of narrow access lane

Review of HLAA

I have been asked to review the suitability, availability and achievability conclusions for each site as set out in the HLAA.

Site Ref 1 - Summerbrook Farm, Ockley Road

Suitability – The site is considered unsuitable in the HLAA on the basis that development of the site would have an adverse impact on the setting of the AONB and AGLV, as it does not relate well to the settlement boundary, would have a significant urbanising effect and a negative impact on the intrinsic character and beauty of the countryside.

This appears to be a reasonable assessment. It is evident that development has spread along Ockley Road, however, the character changes beyond Cobblers Brook giving way to a strong rural character. This site represents the transition to a countryside setting with strong boundary planting and the woods visible in the background. The AONB lies to the north and development on a site of this scale is likely to be prominent from views out of the AONB. The site is not well-related to the village and is a significant distance from key village services which would not encourage sustainable transportation. The site is considered unsuitable for these reasons. However, it is not clear why the HLAA considers the site would harm the AGLV. There appears to be no protection to the setting of AGLV through RE3 of the Waverley Borough Local Plan.

Availability – It is presumed that the availability of the site has not changed.

Achievability – the conclusion provided in the HLAA is considered reasonable.

Conclusion– Unsuitable; Available Achievable.

Site Ref 2 - Farthingham House, Farthingham Lane

Suitability – The site is considered unsuitable in the HLAA on the basis that the hedges and fences of the rear gardens along Farthingham Lane provide a clear and established settlement boundary, that the site would not relate well to the Settlement Boundary, would have a significant urbanising effect and a consequent negative impact on the intrinsic character and beauty of the countryside. The site would also have an urbanising effect on the adjacent SNCI and would have a material negative impact on it.

This appears to be based on sound reasoning as there is a clear and established eastern edge to the settlement. Even though the site appears managed and has lost its rural character, development would encroach beyond this established village edge.

The site is also an ecologically sensitive site due to its location in proximity to a SNCI and ancient woodland.

Availability – It is presumed that the availability of the site remains unclear.

Achievability – the conclusion provided in the HLAA is considered reasonable – It is unclear how access to the site would be achieved.

Conclusion– Unsuitable; uncertainty over Availability and Achievability.

Site Ref 3 - Land to rear of Mapledrakes Road, Ewhurst (known as Tree Tops)

Suitability – The site is considered unsuitable in the HLAA on the basis that the hedges and fences of the rear gardens along Mapledrakes provide a clear and established settlement boundary, that the site would not relate well to the Settlement Boundary, would have a significant urbanising effect and a negative impact on the intrinsic character and beauty of the countryside. The site would also have an urbanising effect on the adjacent SNCI and would have a material negative impact on it.

This appears to be based on sound reasoning as there is a clear and established eastern edge to the settlement. Even though the site appears managed and has lots of rural character, development would encroach beyond this established village edge.

The site is also an ecologically sensitive site due to its location in proximity to a SNCI and ancient woodland.

Availability – It is presumed that the availability of the site remains unclear.

Achievability – the conclusion provided in the HLAA is considered reasonable – no known information as to how it is unclear how access to the site would be achieved.

Conclusion – Unsuitable; uncertainty over Availability and Achievability

Site Ref 4 - Land to rear of Tamarisk, Mapledrakes Road

Suitability – The site is considered unsuitable in the HLAA on the basis that the hedges and fences of the rear gardens along Mapledrakes provide a clear and established settlement boundary, that the site would not relate well to the Settlement Boundary, would have a significant urbanising effect and a negative impact on the intrinsic character and beauty of the countryside. The site would also have an urbanising effect on the adjacent SNCI and would have a material negative impact on it.

This appears to be based on sound reasoning as there is a clear and established eastern edge to the settlement. The site has defined rural character and development would encroach beyond this established village edge into the countryside. The site is also an ecologically sensitive site due to its location in proximity to a SNCI and ancient woodland.

Availability – It is presumed that the availability of the site has not changed.

Achievability – it appears that HLAA misinterprets the Borough Council's Strategic Flood Risk Assessment conclusion for the site. The site is identified as 'red' due to the conclusion from the Council's Land Availability Assessment, not flood risk. The site is not within an area of flood risk (Flood Zone 1), albeit adjacent to Flood Zone 2 and 3 and parts of the parish are susceptible to groundwater and surface water flood risk. However, this is unlikely to be an unsurmountable constraint to development. The site is considered achievable for these reasons.

Conclusion – Unsuitable; Available; Achievable.

Site Ref 5 - Land at Firethorn Farm and 44 - 45 Larkfield, Plough Lane

Suitability – The site is considered unsuitable in the HLAA and notes the site as being open, highly visible from the wider landscape and having a harmful urbanising effect on the intrinsic value of the countryside. Whilst this conclusion is not unreasonable, it is noted that an appeal was recently allowed granting planning permission for 49 new dwellings with

the inspector noting that the proposal would not result in material harm to the character and appearance of the area. The appeal decision also states that Waverley Borough Council and Surrey Hills AONB raised no objections to the application in terms of landscape harm and spoiling views from the AONB. Weight must be given to the site's planning history and, on the basis, the site is considered suitable.

Availability – It is presumed that the availability of the site has not changed. Planning permission recently allowed on appeal backs up this position.

Achievability – the conclusion provided in the HLAA is considered reasonable. Planning permission recently allowed on appeal backs up this position.

Conclusion – Suitable; Available; Achievable.

Site Ref 6 - Land South of Cranleigh Road and west of Gadbridge Lane

Suitability – The HLAA finds the site unsuitable due to its sensitive location on the edge of the village with its rural character contributing to the village's rural setting. This conclusion accords with the inspector's findings from a recently dismissed appeal whereby the inspector found that the scheme in question would result in considerable harm to the character and appearance of the area and the intrinsic character and beauty of the countryside.

It is acknowledged that the WBC Land Availability Assessment (LAA) finds the site suitable for development. The LAA is a high-level site assessment process and is not considered to override the NP Steering Group's own site assessment process. The Steering Group has identified a far-reaching and detailed list of site assessment criteria through consultation with local residents against which all sites have been assessed.

Whilst the site is relatively modest and well-contained, it is not well-related to the village core (and would further spread development along Cranleigh Road away from the village) and is located in a sensitive semi-rural area which forms the approach to the village. Ultimately, the HLAA findings are considered robust.

The HLAA did not consider the potential sites against the 'coalescence' site assessment criteria. This site is particularly relevant for this criteria due to the relationship of the settlement with other nearby settlements and so a view will be given. In this case, it is not considered that development of this site would have a significant or harmful impact on coalescence between Ewhurst and Cranleigh given the location of the site, the proximity to Cranleigh and Brookhurst Wood that separates the two settlements.

Availability – It is presumed that the availability of the site has not changed.

Achievability – the conclusion provided in the HLAA is considered reasonable.

Conclusion – Unsuitable; Available; Achievable.

Site Ref 7 - Land to the rear of Blue Cottage and Penlan, Cranleigh Road

Suitability – The HLAA finds the site unsuitable due to its rural character, sensitive location on the edge of the village, the contribution the site makes to the village's rural setting and harm to nearby Sayers Croft (partly Grade II listed) due to the urbanisation of the site. This conclusion accords with Waverley Borough Council's decision on a recently refused planning application for 9 dwellings which is currently subject to an appeal (in progress). WBC found the harm to designated heritage assets as less than substantial harm.

It is also noted that the WBC Land Availability Assessment (LAA) finds the site suitable for development. The LAA is a high-level site assessment process and is not considered to override the NP Steering Group's own site assessment process. The Steering Group has identified a far-reaching and detailed list of site assessment criteria through consultation with local residents against which all sites have been assessed.

Ultimately, the HLAA assessment appears to be based on sound reasoning. Whilst the site is relatively modest and screened by planting, it is located in a sensitive semi-rural area which forms the approach to the village, characterised by low density ribbon development. It is not considered to be well-related to the core of the village albeit it is located near to some village facilities. The site also forms an open setting to the nearby heritage assets (Sayers Croft), albeit it cannot be clarified whether development of the site would harm the heritage assets given the level of information provided.

The HLAA did not consider the potential sites against the 'coalescence' site assessment criteria. This site is particularly relevant for this criteria due to the relationship of the settlement with other nearby settlements and so a view will be given. In this case, it is not considered that development of this site would have a significant or harmful impact on coalescence between Ewhurst and Cranleigh given the location of the site, the proximity to Cranleigh and Brookhurst Wood that separates the two settlements.

Availability – It is presumed that the availability of the site has not changed. This is backed up by the fact that the site is subject to a pending appeal.

Achievability – the conclusion provided in the HLAA is considered reasonable. This is backed up by the fact that the site is subject to a pending appeal.

Conclusion – Unsuitable; Available; Achievable.

Site Ref 8 - Land at Sixpenny Buckle, Gransden Close

It is understood that this site has been withdrawn from the site selection process and so a detailed assessment will not be undertaken. However, the findings of the HLAA are considered reasonable. The site is considered suitable as it forms part of the existing village structure (within the settlement boundary), nearby to village services and facilities and intensification of the site is unlikely to harm the character of the area (including the Conservation Area) given the varied density in this part of the village.

Overall – Suitable; Unavailable; Unachievable.

Site Ref 9 - Mallards Close, The Street

Suitability - The HLAA finds the site suitable. This conclusion is agreed with as it is a sustainable, centrally located site within the village settlement boundary and nearby to village services and facilities. The site is constrained by heritage assets being within the Conservation Area and within the vicinity of listed buildings.

Availability – It is presumed that the availability of the site has not changed but confirmation should be sought from the landowner to determine the site availability.

Achievability – the conclusion provided in the HLAA is considered reasonable. The viability of developing the site is likely to be constrained by the site's sensitive location and no information has been provided to demonstrate otherwise. Discussions with WBC's heritage officer may assist in determining a suitable density which would thus form part of the viability / achievability assessment.

Conclusion – Suitable; Unavailable; Unachievable (subject to the above).

Site Ref 10 - Thornhurst Brook Farm, The Street

Suitability - The HLAA finds the south eastern part of the site suitable. This conclusion is agreed with in part. Having visited the site, the southern part of the site, which is currently managed grassland, is viewed in the context of the surrounding built form and is well-related to the village and its services and facilities. This part of the site would form a logical extension to the village. Whilst the part of the eastern section north of the access track is surrounded by low density development to the north and east, it is sensitively located on a slope and is likely to be prominent in wider views due to its topography. This part of the site is not currently viewed in the context of the village, however, may be able to accommodate some development. In terms of the north/western leg of the site, this is not considered suitable as this part of the site has a defined rural character and is not well-related to the village, being separated from the village to the east.

The site is within proximity to heritage (Conservation Area and listed buildings) and biodiversity assets (ancient woodland and priority habitat) but these are unlikely to be showstoppers to a sensitive development on this site. However, the narrow site access onto the High Street is noted as being a constraint to development and this conclusion is agreed with having visited the site. It may be able to overcome this constraint although no information has been provided to demonstrate this.

Availability – It is presumed that the availability of the site has not changed.

Achievability – the conclusion provided in the HLAA is considered reasonable. The site access is likely to be a constraint to development. It may be able to overcome this constraint although no information has been provided to demonstrate this.

Conclusion – Suitable (in part); Unknown Availability and Achievability.

Site Ref 11 - Land at West View, Wykehurst Lane

Suitability - The HLAA finds the eastern site (11a) suitable, being well-related to the village whilst the western section (11b) is considered unsuitable due to its attractive rural character. These conclusions are agreed with. Site 11a is surrounded by development to the north and east, is viewed in this context and is well-enclosed by natural (trees/hedgerows) and non-natural (access track) defensible boundaries to the south and west in particular. The western part of the site (11b) does not have a natural rural character being a residential garden but, in isolation, is poorly-related to the existing village. Similar to the previous site, the narrow site access is noted as being a constraint to development and this conclusion is agreed with having visited the site.

Availability – It is presumed that the availability of the site has not changed.

Achievability – the conclusion provided in the HLAA is considered reasonable. The site access is likely to be a constraint to development. It may be able to overcome this constraint although no information has been provided to demonstrate this.

Conclusion – Suitable; Available; Uncertain Achievability

Site Ref 12 - Windacres Farm, Church Street, Rudgwick

Suitability - The HLAA finds this site unsuitable on the basis that is a large site set in an attractive countryside setting (consistent with its designation as an Area of Great Landscape Value) and development of the site would have a negative impact on the intrinsic character and beauty of the countryside. This view is agreed with and development of this scale would form a significant encroachment into the AGLV. The site also relates poorly to the settlement of Rudgwick as the surrounding area is low density ribbon development forming the approach to the village with the majority of services and facilities appearing to be much further to the south.

Availability – It is presumed that the availability of the site has not changed.

Achievability – Despite the findings of the HLAA, given the scale of the site, it is unlikely that contamination issues would prevent development of the site or render it unviable.

Conclusion – Unsuitable; Uncertain Availability; Achievable.

Site Ref 13 - Land South of Cox Green Road, Rudgwick (Phase 1)

Suitability - The HLAA finds this site unsuitable on the basis that is a large site set in an attractive countryside setting (consistent with its designation as an Area of Great Landscape Value) and development of the site would have a negative impact on the intrinsic character and beauty of the countryside. This view is agreed with and development of this scale would be prominent from Cox Road and would form a significant encroachment into the AGLV. The site also relates poorly to the settlement of Rudgwick as the surrounding area is low density ribbon development forming the approach to the village with the majority of services and facilities appearing to be much further to the south.

Availability – It is presumed that the availability of the site has not changed.

Achievability – the conclusion provided in the HLAA is considered reasonable.

Conclusion – Unsuitable; Available; Achievable.

Site Ref 14 - Land South of Cox Green Road, Rudgwick (Phase 2)

Suitability - The HLAA finds this site unsuitable on the basis that is a large site set in an attractive countryside setting (consistent with its designation as an Area of Great Landscape Value) and development of the site would have a negative impact on the intrinsic character and beauty of the countryside. This view is agreed with and development of this scale would be prominent from Cox Road and would form a significant encroachment into the AGLV. The site also relates poorly to the settlement of Rudgwick as the surrounding area is low density ribbon development forming the approach to the village with the majority of services and facilities appearing to be much further to the south.

Availability – It is presumed that the availability of the site has not changed.

Achievability – the conclusion provided in the HLAA is considered reasonable.

Conclusion – Unsuitable; Available; Achievable.

Site Ref 15 - Former brickworks, Horsham Road, Ewhurst

Suitability - The HLAA finds this site unsuitable. Whilst the site is previously developed land and does form part of a ribbon development along Horsham Road, it is not well-related to the settlement of Ewhurst and distant from any local services or facilities. It is not a sustainable location for development. The site is also currently in business use and so development for residential use would result in the loss of employment space. The HLAA finds the site harmful to the AGLV. My view would be that development of the site is unlikely to have a harmful impact on the AGLV as it is previously developed land and development of the site could actually improve the existing appearance of the site. The site is also enclosed by surrounding residential development and woodland to the south and so is not prominent in wider views. Furthermore, the HLAA states that development of the site is likely to cause harm to the setting of the ancient woodland to the south. The site is surrounded by ancient woodland, however, there are no national or local policies protecting the setting of trees or ancient woodland. Notwithstanding, the site is a sensitive ecological site due to its proximity to a SSSI and ancient woodland. Not picked up on in the HLAA is that the site is identified as a Mineral Safeguarding Area (MSA) by Surrey County Council (SCC).

National and local planning policy supports the re-use of brownfield sites. This position does not seem to have been reflected in the HLAA. However, for the reasons set out above, the site is not considered suitable for residential development.

Availability – It is presumed that the availability of the site has not changed.

Achievability – It appears that the HLAA misinterprets the Borough Council's Strategic Flood Risk Assessment conclusion for the site. The site is identified as 'red' due to the conclusion from the Council's Land Availability Assessment, not flood risk. The site is not within an area of flood risk (Flood Zone 1), although parts of the parish are susceptible to groundwater and surface water flood risk. However, it is likely that the site has significant contamination constraints due to its former use which could impact on the viability of development. Furthermore, the site is an identified MSA and so is unlikely to be deliverable unless released for this use by SCC.

Conclusion – Unsuitable; Uncertainty over Availability and Achievability.

Site Ref 16 - Smokejacks, Horsham Road, Ewhurst

Suitability - The HLAA finds this site unsuitable. Whilst the site is previously developed land and does form part of a ribbon development along Horsham Road, it is not well-related to the settlement of Ewhurst and distant from any local services or facilities. It is not a sustainable location for development. The site is currently vacant but was previously in employment use. It is unknown whether there is any likelihood of this use returning. The HLAA finds the site harmful to the AGLV. My view would be that development of the site is unlikely to have a harmful impact on the AGLV as it is previously developed land (albeit admittedly the previous buildings/structures have now blended into the landscape) and development of the site could actually improve the site's current appearance. The site is also enclosed by woodland and surrounding development and so is not prominent in wider views. Furthermore, the HLAA states that development of the site is likely to cause harm to the setting of the ancient woodland to the south. The site is surrounded by ancient woodland, however, there are no national or local policies protecting the setting of trees or ancient woodland. Notwithstanding, the site is a sensitive ecological site due to its proximity to a SSSI and ancient woodland. Not picked up on in the HLAA is that the site is identified as a Mineral Safeguarding Area (MSA) by Surrey County Council (SCC).

National and local planning policy supports the re-use of brownfield sites. This position does not seem to have been reflected in the HLAA. However, for the reasons set out above, the site is not considered suitable for residential development.

Availability – It is presumed that the availability of the site has not changed.

Achievability – It appears that the HLAA misinterprets the Borough Council's Strategic Flood Risk Assessment conclusion for the site. The site is identified as 'red' due to the conclusion from the Council's Land Availability Assessment, not flood risk. The site is not within an area of flood risk (Flood Zone 1), although parts of the parish are susceptible to groundwater and surface water flood risk. However, it is likely that the site has significant contamination constraints due to its former use which could impact on the viability of development. Furthermore, the site is an identified MSA and so is unlikely to be deliverable unless released for this use by SCC.

Conclusion – Unsuitable; Uncertainty over Availability and Achievability.

Summary

Overall, the HLAA provides a thorough and robust assessment of the sites considered for development and will form a useful part of the Neighbourhood Plan evidence base.