

**WA/2008/0788**  
Dunsfold Park Ltd  
04/04/2008

Part outline application for a new settlement of 2,601 new dwellings comprising 2,405 independent dwellings, 150 sheltered housing/warden accommodation and 96 student accommodation; Erection of buildings to provide the following (the maximum amount of floor space is given in brackets) A1 Shops (1,035m<sup>2</sup>); A3 Restaurants/Cafes (230 m<sup>2</sup>); A4 Public House (115 m<sup>2</sup>); A5 Take Away (115 m<sup>2</sup>); B1a and B1b Business use including Offices and Research and Development (9,440 m<sup>2</sup>); B1c and B2 Light and General Industrial use (6,099 m<sup>2</sup>); B8 Storage and Distribution (7,624 m<sup>2</sup>); C1 Hotel (7,015 m<sup>2</sup>); D1 Non-Residential Institutions including health centre, two schools, place of worship, museum and community centre (9,906 m<sup>2</sup>); D2 Assembly and Leisure use including sports centre (2,185 m<sup>2</sup>); Monument; combined heat and power plant; together with associated works following demolition of 8, 029 m<sup>2</sup> of existing buildings and removal of runways. Part full application for the Change of Use of 36,692 m<sup>2</sup> of existing buildings as specified, retention of aviation use solely for helicopter flights including air ambulance service, use of land for outdoor sports and recreational facilities.

**Land At Dunsfold Park, Stovolds Hill, Cranleigh GU8 4BS**

Grid Reference:

E: 502730 N: 136270

Parish :

AlfoldDunsfold

Ward :

Alfold, Cranleigh Rural and Ellens Green Chiddingfold and Dunsfold

Case Officer:

Ian Ellis

16 Week Expiry Date

25/07/2008

Neighbour Notification Expiry Date

30/05/2008

**NOTE: This Briefing Note has been prepared prior to the Technical Briefing Meeting on 3 September to inform Councillors about this major planning application.**

**The Note does not comment on the overall acceptability of the scheme. This would be inappropriate at this stage, primarily because the Technical Briefing Meeting, like a Members site visit, is part of the information gathering process and not a decision-making meeting. The debate on the merits of the development and the issues raised can only take place when officers can present a full analysis and their recommendation at the Planning Committee.**

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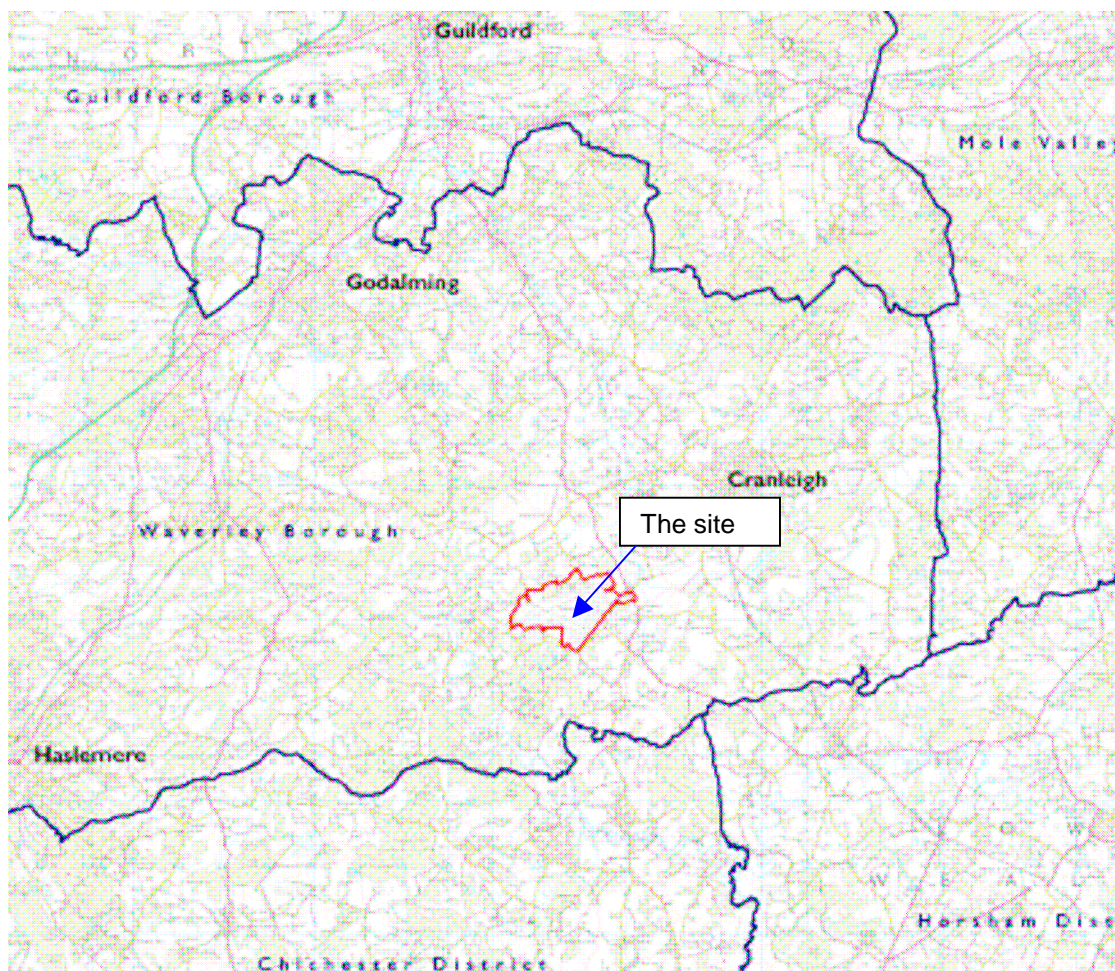
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## 1.0 Background

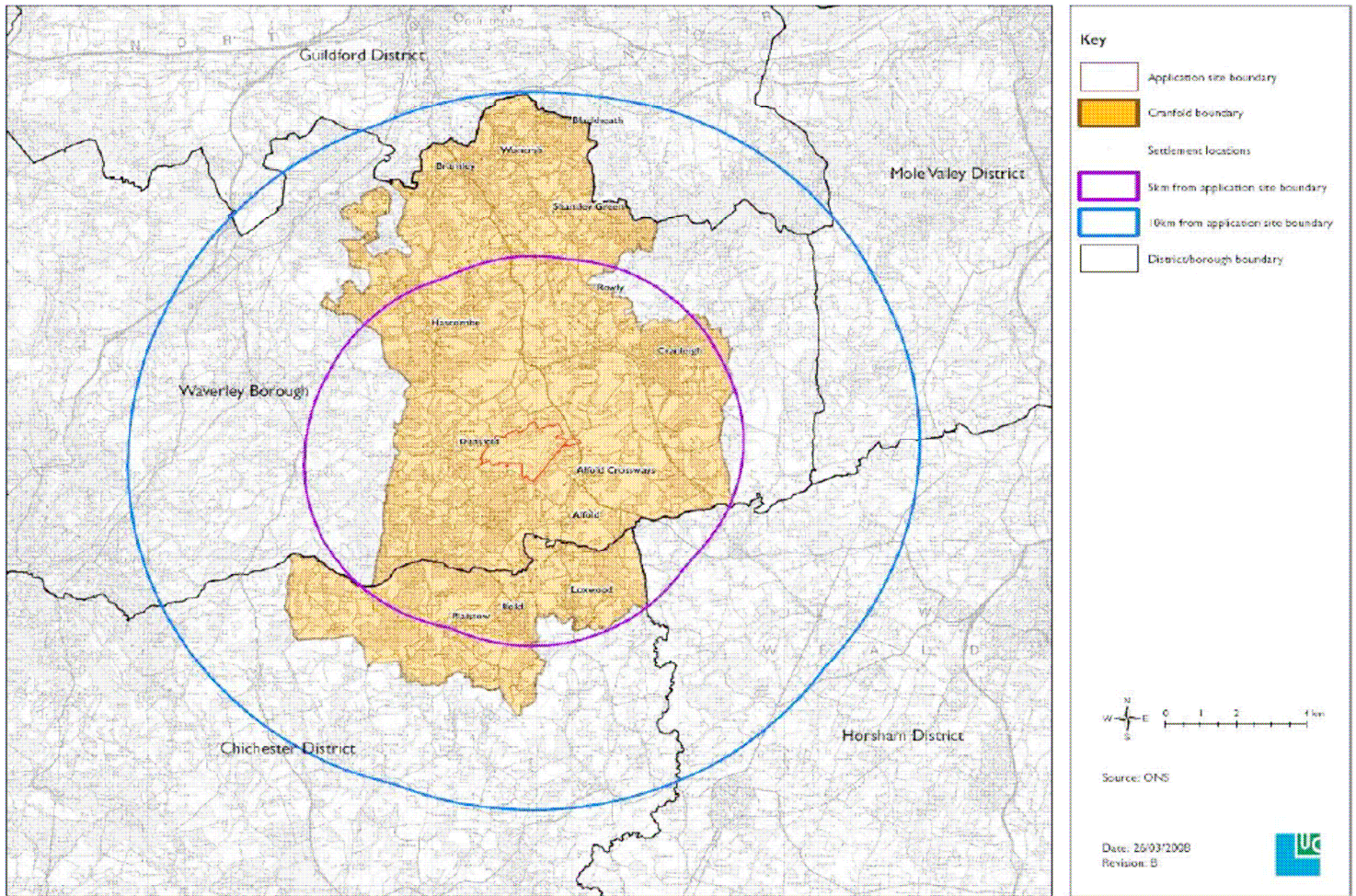
- 1.1 The site lies mostly within Alfold parish and partly within Dunsfold parish. It is also close to the county boundary between Surrey and West Sussex and the adjacent districts of Chichester and Horsham. The map below shows the wider context.



**Map 1. The application site and administrative areas**

- 1.2 The application concerns the creation of a new settlement allied to the substantial employment development within the former aircraft manufacturing buildings at Dunsfold Aerodrome.
- 1.3 The applicants have used the term “Cranfold” to refer to the wider locality around the application site embracing a number of villages. This cluster of villages, the applicants argue, are the ones that may be affected by Dunsfold Park and which tend to look to Cranleigh for shops and services. The applicants argue that the proposals are designed to promote greater self-containment within Cranfold.
- 1.4 “Cranfold” is shown on the map on the following page.

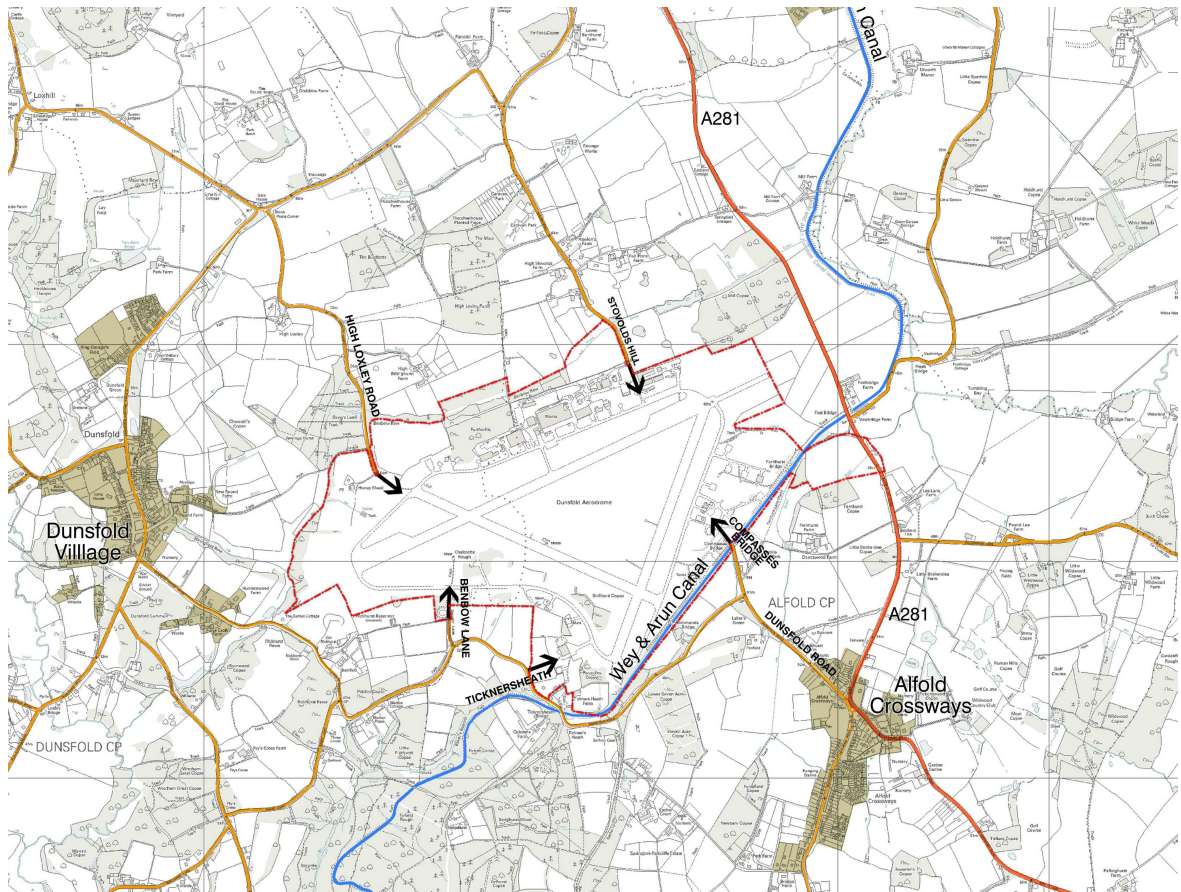




**Map 2 The applicant's "Cranfold" area.**

## 2.0 Site Description

- 2.1 The site is located in a rural area east of the village of Dunsfold on a former aerodrome. It extends to some 248ha (613 acres). The nearest large settlements are Guildford (11miles to the north), Godalming (9.4miles to the north), Cranleigh to the north-east (4.3miles) and Horsham (11.3miles) to the south-east.
- 2.2 Map 3 below shows the location site in the context of its immediate surroundings. The site is situated close to the A281 that runs to the east. The nearest railway line is the London to Portsmouth line to the west of the site, with the nearest station by road being Godalming. Currently vehicular access to Dunsfold Park is through either of two entrances – the main entrance at the northern end of the site off Stovolds Hill that gives access to the B2130 Godalming to Cranleigh Road and to the A281 north, and a secondary entrance at the southern end of the site at Compasses Bridge that gives access to the A281 south at Alfold Crossways. A third vehicular access at Tickner's Heath, on the Dunsfold Road, is not in general use but has been used in connection with special events.



**Map 3. The application site and its immediate surroundings**

- 2.3 Two other potential points of access join the local road network to the Dunsfold Park boundary, at High Loxley Road and Benbow Lane. However, these are currently fenced off and no access to or from the site is possible. Close to the north western boundary there exists a pedestrian path to Dunsfold Village that connects to the southern section of High Loxley Road.

- 2.4 The Wey and Arun Canal runs northeast to southwest within the eastern boundary of the site.
- 2.5 The surrounding land is largely arable with extensive pockets of woodland and established field boundaries. Land to the immediate west of the site boundary (Dunstable Common) is designated as Registered Common Land. There are other types of land use e.g. designated sites (such as those for nature conservation) and community facilities. This part of the Borough is low-lying, relatively level and a mixture of farmland, woodlands, isolated dwellings and small settlements. The Surrey Hills AONB lies to the north.
- 2.6 Dunstable Park itself consists of:
- the open airfield with its runways, perimeter track and surrounding grassed areas;
  - a large complex of buildings to the north;
  - a cluster of smaller buildings and hard standing areas to the east;
  - the remainder that has a more rural character with grassed areas, copses of trees, woodlands and occasional buildings and hard standing areas.
- 2.7 The main access to the aerodrome and buildings to and from the highway network is via Stovells Hill that leads to the B2130 and then to the A281. There is a second access from Alfold Crossroads via the Compass Gate entrance to the buildings on the southeast side of the site. There are a number of footpaths running through the adjoining rural areas but none cross the aerodrome.
- 2.8 Although the site is registered with the International Civil Aviation organisation as an aerodrome, and is colloquially referred to as "Dunstable Aerodrome", the activities that may take place on the site are constrained by the relevant planning permissions. For the avoidance of any doubt the site does not operate as an aerodrome; only aviation activities that are ancillary to the principal uses may take place.



### 3.0 Proposal

3.1 The proposal is a hybrid planning application whereby outline permission has been sought for all new construction (all matters reserved, including access from the A281) and full permission is sought for the change of use of those existing buildings that are to be retained. The application is accompanied by 20 detailed reports the titles of which are set out in appendix A.

3.2 The essential point of the proposal is to create a mixed-use sustainable community. The main elements of the proposal include:

- Development of 2,601 houses and flats (made up of 2,405 Use Class C3 dwellings and 196 C2 units in residential institutions (46 for students and 150 for elderly residents). 910 of the dwellings will be provided as affordable homes.
- Development of a village centre including local shops, cafes and restaurants, public house, hotel, a primary school, sports centre, place of worship, community centre, health care and other services to meet day-to-day needs.
- Employment development totalling 59,854m<sup>2</sup> floor space made up of existing employment floor space of 36,692m<sup>2</sup> and new 23,162m<sup>2</sup> of new floorspace. The uses would fall within Class B1, B2 and B8.
- New vehicular access via a roundabout junction on the A281
- Aviation museum
- Retention of the balance of the site as open space and enhancement of the landscape for biodiversity, recreation and amenity.
- Combined Heat and Power plant fuelled by renewable woodland produce linked measures to reduce energy and water consumption.
- Waste treatment plant on site producing recyclable/recoverable material.
- Relocation of Surrey Air Ambulance
- New premises for the Jigsaw special school

3.3 The proposal also involves the following:

- Closure of the airfield except for use by the Surrey Air Ambulance and Police.
- Re-use and refurbishment of the infrastructure on the site and recycling of the materials in, for example, the extensive areas of runways and hardstandings in the construction of the development.
- A land use and transport strategy designed to reduce the need to travel and to maximise the opportunities and incentives to travel by sustainable modes.

3.4 The applicant explains that the proposal would create a balanced community that:

- Builds on the existing and future employment potential offered by the site.
- Promotes the sustainable development, in social, economic and



environmental terms, of the wider Cranfold area.

- Supports the economic development of the wider region which is the engine of the UK economy.
- Manages the demand for resources.
- Delivers innovative technologies for energy, transport and waste to reduce the environmental footprint of the development.
- Creates a diverse housing stock that offers choice for new residents, a broad social mix and opportunities for mobility between tenures.
- Develops housing that performs to the highest feasible environmental standards.
- Makes no call on public funds for the delivery of the development.
- Enhances the natural qualities of the site which sits adjacent to very important landscape features.
- Minimises negative impacts on the surrounding areas and communities

3.5 In land area terms the table below shows how the available land would be used by the principal uses.

Use	Area (ha)	% of site	Notes
Gross Residential Area	80	32.3	Excluding peripheral landscape, Business Park and mixed-use district.
(Of which Net Residential Area	57	23.0	Excluding peripheral landscape, business park, mixed-use district and community facilities; including small open spaces and access roads.
(Of which Community Facilities	23	9.3	Includes roads, public open spaces, School, Museum, Shops, Energy and Utilities Centre
(Of which Runway Park	8	3.2	
Business Park	26	10.5	Includes mixed-use district.
<b>TOTAL BUILT AREA</b>	<b>105</b>	<b>42.3</b>	
<b>PERIPHERAL LANDSCAPE</b>	<b>143</b>	<b>57.7</b>	Excluding Runway Park
<b>TOTAL SITE AREA</b>	<b>248</b>	<b>100</b>	

**Table 1 Principal use areas**

3.6 The proposed residential development is made up of a variety of types and tenures embracing market price and affordable homes, accommodation for students and the elderly. The affordable housing represents 35% of the total number of dwellings. The applicants estimate that, in total, housing at Dunsfold Park across all tenures would accommodate some 6,094 people. The gross density of the housing is approximately 32.5 dwellings per hectare and the net density 45.6 dph.

3.7 The housing element of the proposals is explained and amplified in two key documents volume 5: Housing Strategy and volume 6: Housing Land Supply Assessment (amended). The size and mix of development is explained in the table below.

	Open market	Inter-mediate	Social	Institutional (Student and Elderly)	TOTAL	%
Studios				46	46	1.8%
1 Bed Flats	208	80	87	100	475	18.3%
2 Bed Flats	215	75	75	50	415	16.0%
2 Bed Houses	237	58	70	0	365	14.0%
3 Bed Houses	330	63	130	0	523	20.1%
4 Bed Houses	335	50	130	0	515	19.8%
5 Bed Houses	170	25	67	0	262	10.1%
Sub- Totals	1,495	351	559	196	2,601	100.0%
TOTAL %	57.5%	15.3%	21.5%	5.8%	100.0%	

**Table 2 Housing sizes and mix**

- 3.8 The affordable housing would be provided through a trust without public subsidy that will own the units and sub-contract the management of the affordable housing to a Registered Social Landlord. All tenancy agreements will be in the standard form of that RSL. The social rented units will be let at Housing Corporation target rents.
- 3.9 The details of the how employment space is to be developed are set out in volume 11 Economic Development, Shops and Services Strategy statement. The site currently accommodates some 44,721 m2 of mixed industrial, office and distribution floorspace. This will evolve over the period of the Master Plan (which is expected to be implemented over about ten years) through:
- 8,029 m2 being demolished to remove buildings located outside the main industrial area and to remove obsolete premises;
  - This will leave 36,692 m2 of existing space being retained in the long term.
  - Capacity within the existing industrial area will be used to add up to 15,247m2 of additional industrial space, much of it to accommodate firms relocating from elsewhere in the locality.
  - Diversification of the property offer will be achieved by developing up to 7,915 m2 of B1 (a/b) space adjacent to both the industrial and residential areas.
- 3.10 The resulting total of employment space, excluding that in the village centre and the on-site utilities, would be up to 59,854 m2 with total employment on the site expected to be about 2,000 employees. In 2006 Dunsfold Park was home to 80 businesses employing 638 people. The potential workforce of some 2,000 people would be in the sectors set out in the table over the page.

All floorspace figures are gross external	2008			2020		
	Sq.m	Employment Density (sq.m per worker)	Workforce	Sq.m	Employment Density (sq.m per worker)	Workforce
Existing Floorspace	44,721	70.1	638	36,692	46.0	815
Additional Floorspace (Industrial Area)				15,247	33.2	459
Additional Floorspace (Mixed-Use District)				7,915	20.0	396
Village Shops and Services						330*
<b>TOTAL</b>	<b>44,721*</b>	<b>69.5**</b>	<b>638</b>	<b>59,854</b>	<b>N/A</b>	<b>2,000</b>

\* See Appendix B for breakdown of employment in village shops and services;

\*\* Does not include open storage;

\*\*\* Does not include 402 sq.m vacant space as of February 2008 survey, as per English Partnerships guidance.

**Table 3. Employment levels**

3.11 Access and Transport is addressed in three volumes; Vol 7 Transport Strategy, Vol 8 Transport Assessment and Vol 9 Travel Plan. The aim of the transport strategy is to provide residents and employees with viable alternative options to the private car for their transport needs. This would be achieved through:

Internal transport measures:

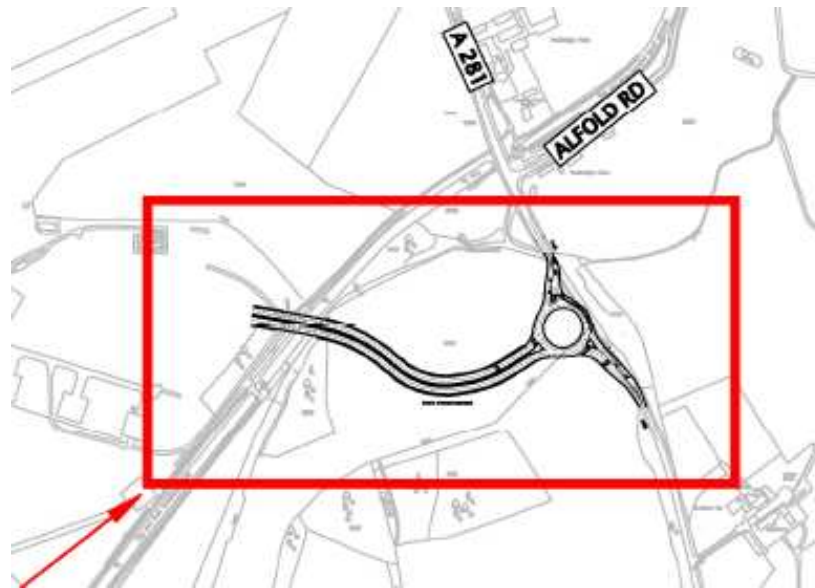
- Car Restrained Area;
- Comprehensive pedestrian and cycle network;
- Bicycles (and appropriate parking) provided with all households
- along with cycle hire service for visitors/employees;
- Parking restrictions and 'parking barns';
- Community Neighbourhood Electric Vehicles;
- Local Bus Service integration;
- Neighbourhood Electric Delivery Vehicles and Central Deliveries
- Centre;
- Transport 'Hub';
- Transport Coordinator;
- Social Networking Database for Dunsfold Park; and
- Individualised Travel Marketing.

External transport measures:

- Commuter Bus services;
- Electric Vehicle promotion;
- Social Network and Car sharing database;
- Cycle & Walk links;
- Car User Charging;
- Workplace Travel Plans; and
- Workplace parking levy.

3.12 The proposal also involves the construction of a new access road from the A281 to the new settlement. This would take the form of a new roundabout south of the present junction of Alfold Road with the A281 and would be a short length of

dual-carriageway into the site. This would be the only access for commercial vehicles.



**Map 4. New vehicular access and roundabout to A281**

- 3.13 The existing vehicular access via Compass Gate would be retained for buses and private vehicles and two further accesses to Stovolds Hill and Tickners Heath Road would be provided for buses and emergency vehicles only. In addition to those routes previously mentioned cyclists and pedestrians would also have access/exit routes via High Loxley Road, Benbow Lane and the Wey and Arun Canal towpath.



## **4.0 Relevant Planning History**

- 4.1 The following summarises the planning history of the site as a whole and omits individual buildings or uses applications. Dunsfold Aerodrome was established in WWII as a Canadian airfield. Planning permission was given in 1958 for the aerodrome to be used for the erection, repair and flight-testing of aircraft (HM/R9831).
- 4.2 That permission was refined in 1980 by placing it on a limited timescale (to yr 2000) and restricting the number of employees (WA/1980/0697). The permission was varied in 1996 to allow the production, repair and flight-testing of aircraft until 2020 (WA/1996/1334). It was again refined in 1998 to allow the use to continue on a permanent basis (WA/1999/1913) and again in 2000 to allow use of the site by organisations other than BAE (WA/1999/1913 to 1925)
- 4.3 Around 2000 BAE Systems plc, the main occupier of the site for many years, vacated the site and a 999-year lease was subsequently granted to Dunsfold Park Limited in 2002. A suite of planning permissions granted in 2000 required the site to remain in single occupation but this was subsequently changed to being managed by a single company.
- 4.4 Temporary permission was given in 2003 to change the use of the land and buildings to B1, B2 & B8 including outdoor storage together with air flight capability ancillary to those uses (WA/2002/2046). That permission was varied in 2005 to extend it to 2010 and varied again to extend such uses to 2018 (WA/2007/0372). Air related movements are limited to 5,000 per annum and must relate to i) the assembly, repair or flight testing of aircraft and ii) movement of staff and customers associated with companies at Dunsfold Park (WA/2004/0880 and 2007/0372).
- 4.5 Air flight capability at Dunsfold Park is currently controlled by the conditions on planning permissions WA/2004/0880 and WA/2007/0372).

## **5.0 Development Plan Policies and Proposals**

- 5.1 The relevant policies of the Regional and Development Plans are set out and summarised in Appendix C. They will be referred to in detail in section 10 Planning Considerations below.
- 5.2 The only adopted planning policy relating specifically to Dunsfold is Policy DN9 of the Surrey Structure Plan 2004. This states:

*"With the exception of Dunsfold Aerodrome, the development of new airfields or the re-opening of disused airfields will not be permitted." The explanatory text states "The development of new airfields, or the re-opening of existing ones, will not be permitted as there is sufficient capacity at both Fair Oaks and Redhill for additional flying activity. The only exception is Dunsfold. The Local Planning Authority will prepare an area action plan for the site, which will indicate whether future aviation use is considered appropriate. If the site is promoted for aviation, then light aviation use is considered as being the most suitable option, provided any adverse impacts are sufficiently controlled."*

- 5.3 The adopted Local Plan contains no specific policies for the site but envisaged that supplementary planning guidance would be prepared at a future date (paras 7.50 – 7.55). The Council's Local Development Scheme envisages that a Dunsfold Aerodrome Acton Area Plan but commencement depends upon resources becoming available.

## **6.0 National Planning Policy Statements and Guidance**

- 6.1 These are set out and summarised in Appendix D. Where relevant they are referred to in further detail in section 10 below.

## **7.0 Site Specific Environmental Constraints**

- 7.1 As befits a large site the planning and environmental constraints are numerous and include the following:
- Countryside beyond Green Belt
  - Small part within the Area of Great Landscape Value but otherwise the AGLV borders the site to the north, west and south.
  - Site of Nature Conservation Importance on part of the site and adjoining
  - Long distance footpath (part)
  - Small part of the site is an Area of High Archaeological Importance
  - Wealden Heaths I Special Protection Area (SPA) 5km

## 8.0 Summary of Consultation responses and Parish Comments

### Statutory and non-statutory consultations

- 8.1 The full consultation responses are set out in full in Appendix F and summarised below.
- 8.2 **Government Office for the South East (GOSE) have issued a direction** that the Council do not grant planning permission for the development or grant or deem permission for any development of the same kind on any land which forms part of or includes the site of the said proposal without the Secretary of State for Communities and Local Government authorisation.
- 8.3 **South East England Regional Assembly (SEERA) considers that** on the basis of the information provided, the proposed development would materially conflict with Policies Q1 and H5 of RPG9 and prejudice the implementation of the Regional Spatial Strategy (RPG9 and Alterations) and the borough council should not grant planning permission. The proposal also materially conflicts with the objectives of Policies CC8a and H3 of the draft South East Plan and its release would prejudice the emerging Core Strategy DPD of the Local Development Framework.
- 8.4 **South East England Development Agency (SEEDA)** recognises that the local planning authority will need to determine the application in accordance with the Development Plan unless material considerations indicate otherwise. It is noted that there is no planning policy context for development at this site at either local or regional level. The SE Plan Panel report did not support the development because of its location and that it would be difficult to secure the level of self containment which would otherwise overcome the disadvantages of its location. As a result SEEDA recognises that the Council may conclude that the application is not in accordance with the development plan.
- SEEDA welcomes the innovative transport, energy, waste and water initiatives in the scheme proposal and recognise that in terms of a mixed-use development it does meet many of the RES sustainability objectives (Objective 3). No objection is raised to the continued use of the site for employment purposes and of job growth up to a similar figure as previously.
- 8.5 **Surrey Economic Development Partnership** No comments received.
- 8.6 **Surrey County Council Strategic Planning** conclude that the proposals for a new settlement at Dunsfold Park fail to comply with the spatial strategy of the saved Surrey Structure Plan, 2004, which requires proposals for sustainable development to be properly located primarily as part of the management of change and the regeneration of urban areas. Proposals are also to be located so as to contribute to satisfying identified local housing needs for existing communities in an appropriate way thus ensuring such communities also benefit from affordable housing, improved services and transport provision.

Objection is therefore raised under the spatial strategy of the Surrey Structure Plan, as given under saved Policies LO1 and LO2 concerning the proper location

of development and the more efficient management of urban areas respectively. Objection is also raised as a consequence under saved Policy LO4 concerning the protection of the countryside, and saved Policy LO5 concerning the need for limited development within rural settlements to ensure meeting the local community's social, economic and recreational needs. Objection is also raised under saved Policy LO7 concerning the acceptability of increased economic activity on the site leading to employment growth and commuting that would run counter to the spatial strategy of the Structure Plan.

In the County's view, it is also unlikely that a concentration of affordable housing units within this part of Waverley will be the most acceptable option for dealing with local needs assessments within the Borough. This matter is for the Borough to determine under the Local Development Framework process. Objection is therefore also raised under saved Policy LO6 concerning general housing provision, and under saved Policies DN10 and DN11 concerning the most appropriate mix of dwellings and affordability.

Neither would the proposals comply with the emerging regional strategy under the South-East Plan. The Examination Panel specifically found against by a new settlement at Dunsfold Aerodrome. The Secretary of State's Proposed Modifications to the draft Plan are awaited. The County would not anticipate a radical modification to the spatial strategy of the draft Plan so as to accommodate proposals for a new settlement in Waverley.

In the County's view, circumstances affecting the Borough, including local housing needs, are not likely to make it critical that housing provision on the scale proposed at Dunsfold Park should be considered as a preferred option within the Borough's Local Development Framework process. It is likely that the Borough would need to pursue more appropriate options, as a consequence of the assessment of urban areas and existing infrastructure capacity and needs, so as to comply more closely with the emerging South-East Plan requirements.

It is also the County's view at the current time that the proposed development would be heavily dependant on travel by private car. Notwithstanding the submitted Transport Strategy, the County's view is that the proposed development would therefore be contrary to Government policy and saved Policy LO1 concerning accessibility. It has also not been adequately demonstrated that proposed improvements to transport infrastructure in the vicinity of the site are appropriate to serve a development of the scale and nature proposed, contrary to saved Policies DN1 and DN2 concerning highway infrastructure and the movement implications of development respectively.

The proposals also are not likely to succeed in bringing forward other necessary infrastructure to underpin the Structure Plan and emerging South-East Plan to ensure proper spatial planning within Waverley. In particular, a solution will need to be reached on educational provision. Satisfactory agreement would therefore be required concerning educational and libraries provision, to obviate objection under Policy DN1 concerning general infrastructure provision.

Nevertheless, taken in isolation from spatial and regional planning policies affecting the County, and subject to the comments above, the proposals seek to



satisfy the requirements of Government and local policy regarding the need to promote environmental sustainability to a significant degree. On balance, the proposals potentially can also comply with the policies of the County's Waste Plan concerning the proper treatment of waste. Further details would need to be submitted in order to justify any need for waste importation in order to meet the requirements of Policies WD7 and WD8 of the Surrey Waste Plan.

Should the Borough Council be minded to permit the proposals as an exceptional case on the basis of the environmental benefits of development, departure procedures would need to be a consideration.

**8.7 Surrey County Council Highways and Transportation** object and recommend refusal on the following grounds:

- 1) The proposed development of 2,601 homes, extension of the existing employment uses and creation of other uses in this very rural location would be heavily reliant on travel by the private car contrary to Central Government Policy expressed in PPS1, PPS3 and PPG13, and Development Plan Policy LO1 of Surrey Structure Plan 2004, Policy M1 of 2002 Waverley Local Plan.
- 2) It has not been adequately demonstrated that the limited proposed improvements to transport infrastructure in the vicinity of the development are appropriate to serve a development of this scale and nature, nor that further improvements could be implemented that would mitigate the adverse impacts of a substantial increase in travel demand in this very rural location.

It is further advised that in the event that the deciding authority considers there are other planning interests of acknowledged importance that outweigh the above fundamental objections, and that Planning Permission should be granted, a package of transportation mitigation measures that might partially lessen the travel impact of the development should be imposed as a pre-requisite. This should be delivered through an appropriate legal agreement that includes Surrey County Council as signatory.

**8.8 Waverley Borough Council Planning Policy** comment and object to the proposal on the grounds that this is a very significant development, which is of more than local significance. As it stands, a development of this size/type is not promoted either through regional planning policy, the County Structure Plan or the Local Plan. The proposal conflicts with Local Plan Policy C2. The policy states that outside settlements the countryside will be protected for its own sake. It also states that building in open countryside away from existing settlements will be strictly controlled. Having regard to this, and the absence of any strategic designation or identification of this site for this type of development, the policy conflict is very clear.

There are also the locational considerations. Policy M1 promotes developments that are major trip generators in the main settlements, which are relatively speaking the most accessible by public transport, walking and cycling. Clearly this mixed-use proposal is intended to provide a settlement with a core of necessary services/facilities. However, these will not cover all needs and the

relatively remote location of the site is clearly another factor affecting the principle of development, as identified by the SEP EIP Panel.

There is no shortfall in housing delivery to the extent that it must be addressed by a development of this scale, which represents over 50% of the anticipated SEP requirement for the period 2006-2026. The current uses and the status of the various planning approvals on the site are material considerations. This is a significant site and it contains a large amount of floorspace. However, this, in itself is not sufficient justification to support what is otherwise a very significant development in a rural location, where no regional/local need has been identified for the development.

- 8.9 **Waverley Borough Council Housing** (revised comments following meeting on 8 July awaited)
- 8.10 **Waverley Borough Council Environmental Health** raise no objection but point to the fact that many of the potential negative impacts and all of the potential negative cumulative impacts. These are both during the construction phases and/or once the development is completed.
- 8.11 **Waverley Borough Council Leisure Services** comments awaited
- 8.12 **Waverley Borough Council Arboriculture Officer** raises no objection and comments that the overall scheme of creating a new settlement the extent of tree/hedgerow loss associated with these works would appear relatively low in terms of landscape impact. The proposal can be feasibly undertaken without having a significant detrimental impact on the principal landscape features and habitats of the local area.

Proposed new landscape planting could enhance and mitigate the loss in this respect and combined with proposed implementation of management plans for significant woodlands that are currently neglected, potentially would have a positive long term effect.

- 8.13 **Commission for Architecture and the Built Environment**  
We encourage the bold vision behind this proposal for an exemplary new sustainable settlement. However, we think it will be challenging to make a convincing case for a new settlement of this scale in this location. It is unfortunate that the local authority has yet to adopt an Area Action Plan to establish an agreed vision for the site to assist in discussions with the landowner and key stakeholders. We are disappointed that the proposed masterplan fails to demonstrate a strong conviction about how Dunsfold Park should be planned to reflect the site's heritage and its physical context to match the client's visionary approach to sustainable energy and waste management. We urge the design team to put forward a plan that reflects a 21st century model for sustainable living, instead of a conservative image of pre-war housing. A more successful plan could emerge from revisiting the building typology of vernacular revival buildings currently envisaged for the site, which we feel is at odds with the vision for this place as a green 'village of the future'.

Further, we are not convinced that sufficient provision has been made for future expansion. Phasing and procurement will also be critical in determining the success of this new settlement. In light of the above concerns, we think planning permission should be refused for this proposal in its current form.

- 8.14 **Environment Agency** raise no objection subject to the imposition of a number of conditions concerning Flood Risk; Ecological Conservation; Groundwater Protection and Water Resources.
- 8.15 **Thames Water Authority** raise no objection subject to conditions being imposed regarding waste water infrastructure, water supply and surface water drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system. They also express concern about the sewerage treatment capacity of Cranleigh STW to cope with the demand anticipated from this development.
- 8.16 **Southern Water** does not wish to comment.
- 8.17 **Natural England** comment that provision of accessible natural greenspace within the development meets Natural England's Accessible Natural Greenspace Standards (ANGst) and should be subject to long-term management of these areas through a section 106 agreement. They consider that the development would have a negative impact on the landscape character of the locality. They consider that the mitigation for protected species is appropriate. Potential lighting impact should be considered, particularly in relation to the bat species.
- 8.18 **Surrey Wildlife Trust** comment that the proposed development is adjacent to a large number of important habitats, including Sites of Special Scientific Interest (SSSI) and 11 Sites of Nature Conservation Importance (SNCI) within 1km. The Trust is concerned that a development of this size and type will have a significant effect on these habitats and animals in the vicinity. The development would represent a significant increase in human presence in the area and consequently disturbance to wildlife and habitat. Additional traffic, pollution incidents, fly tipping and pet activity can all have a significant adverse affect on wildlife. The area has been surveyed and several species of legally protected species have been found on site including, bats, badgers and great crested newts. In addition various Red Data Book and Biodiversity Action Plan (BAP) Priority Species and Habitats would also be affected. If the development were granted it would be essential that all the mitigation proposals contained in the Ecology Section of the Environmental Statement (ES) be conditioned.

8.19 **Surrey County Council Education** comment that as well as securing nursery provision, and provision of a site plus 2FE primary school, with scope to expand to 3 FE a financial contribution of about £6.5M would be required for secondary education provision. Without these provisions the development would not be acceptable.

8.20 **Surrey County Council Social Services** No comments received.

8.21 **Surrey Constabulary** consider that this proposed development will undoubtedly impact on the existing community and has the very real capacity to increase criminality and antisocial behaviour levels in the ward. In order to mitigate and address the potential increase of crime and incident impact on the levels of local Policing in a normally quiet and rural area there should be provision and financial contributions towards:

- An extra NSO and PCSO with a clear contract for these Officers not to be in that area when operationally required elsewhere.
- A suitable vehicle.
- A purpose built office and garage to allow for a base on site. This could be attached to a public building such as a community hall. Ancillary support equipment, such as a link to the police computer systems.
- An outside emergency phone link to our command centre
- Any additional CCTV and monitoring equipment that may be identified as assisting Policing during discussions with the management organisation.

8.22 **Surrey Fire and Rescue** No comments received.

8.23 **Sport England** supports the proposal and the submitted Open Space, Recreation and Access to Nature Strategy for the new settlement. Additionally, Sport England support the use of the parkland to provide outdoor sports provision to include a number of football, cricket and rugby pitches, a bowling green, tennis courts and a sports pavilion, which is proposed to cater for all ages and the disabled. These areas will provide the new community with both formal and informal areas for sport. The design layout and the creation of cycle ways, both on and off site, and pedestrian corridors is encouraging, as this will help promote healthy lifestyles by supporting cycling and walking and creating accessibility to facilities. They consider the proposals should also include a swimming pool space.

Provided the above points in relation to planning contributions and maintenance of the proposed sport and recreation facilities are secured, Sport England would wish to support the planning application.

8.24 **Surrey Primary Care Trust** wish to be actively involved in any residential development discussions before decisions are made. They are not sure if the effect on health is understood and would like around £3 to £4million as a section106 contribution.

8.25 **National Air Traffic Service** has no safeguarding objections to this proposal.

8.26 **West Sussex County Council** object since from the transport evidence provided, the application will result in a projected increase in motor traffic on the A281 from the



County boundary of approx 30% or more. This is likely to result in an unacceptable reduction in the level of service on this road, which forms part of the West Sussex Strategic Road Network as defined in the West Sussex Transport Plan Figure 6.11. This increase in local traffic and reduction in level of service is incompatible with our LTP objective to manage our strategic road network to maintain its efficiency and effectiveness and to encourage HGVs and larger distance traffic to use it.

The County Council also make a number of comments and criticisms about the traffic assessment that has been carried out and the omission of the commitment for significant development at Broadbridge Heath, which is also on the A281 axis.

- 8.27 **Chichester District Council** are concerned as to the prematurity of the application, ahead of the production of Waverley Borough Council's Core Strategy. It is considered the proposed development, so close to the Boundary to Chichester District, is likely to impact on the District and its residents. There is concern as to the pressure on the existing services and infrastructure in the area, particularly highways, such as the B2177 going through Loxwood and Billingshurst. The proposal for 2,601 dwellings will be unable to support the development of a sustainable settlement, leading to concern that future residents may need to travel outside the development for a number of facilities, putting pressure on nearby facilities in the north of the Chichester District as well as Waverley Borough.

Concern is also raised about the effects the proposed development may have on the internationally important sites (Special Areas of Conservation) of Ebernoe Common and The Mens, within the West Wealden Landscape Project Area. The potential effects this development may have on the protection of these bats and their habitats, including their flightlines should be a carefully considered. Chiddingfold Forest SSSI crosses the border of Chichester District and Waverley Borough, it is considered that any potential on this protected site should also be considered.

- 8.28 **Horsham District Council** comment that overall their view is that the provision of a strategic scale mixed use development in this location, comprising a significant amount of housing and employment floorspace, together with other uses would be contrary to sustainable development objectives. It would be likely to result in substantially increased traffic levels in the area, including the north-western part of Horsham District. The A281, the main east/west route and other rural roads in the area would be seriously affected and are not suitable or considered capable of accommodating the levels of traffic likely to be generated by the scheme.

The Council therefore formally objects to the application on the grounds that:

- (a) The level of development proposed is not required to help meet the housing requirements of Horsham District; and
- (b) The development would be likely to cause adverse environmental impacts on Horsham District due to significantly increased traffic levels, resulting in increased congestion on roads in the District, increased noise and an adverse impact on air quality.

It is also considered that the development would be contrary to Policies CP2 (Environmental Quality), CP4 (Housing Provision) and CP19 (Managing Travel Demand and Widening Choice of Transport) of the Horsham District LDF Core Strategy (2007) and Policy DC40 of the Horsham District LDF General Development Control Policies (2007).

- 8.29 **Guildford Borough Council** strongly object to the proposal on the grounds that the new settlement within a wholly rural area south of Guildford Borough is unacceptable, as it is not regarded as a sustainable eco-community despite the applicant's assertions. The Council does not regard this development to be sustainable in transport terms and in conflict with national guidance within PPG13. They consider that much extra traffic pressure will be added to the A281 with its already over capacity junctions and congestion just south of Guildford. Concern is raised that the impact of the development on traffic in Guildford town centre has not been addressed.

It is also considered that there will be additional pressures placed upon the existing facilities and services within Guildford such as hospital facilities and secondary school places amongst others, and at a time when Guildford will have to face the challenges of ensuring sufficient infrastructure to meet the needs of its own required housing growth. It is not considered that the required infrastructure that is required to service the development has been demonstrated will be provided and as such the proposal conflicts with policy DN1 of the Surrey Structure Plan 2004.

- 8.30 **Wey and Arun Canal Trust** consider that any development should ensure that the rural integrity of the canal is preserved. It is strongly suggested that the overbridge crossing the canal at the northern extremity of the land ownership is built with sufficient headroom to allow canal craft to pass below. The roundabout where the new road joins the A281 must also be constructed so that it does not make the restoration of the canal crossing under the A281 any more difficult to construct than it is at present. The WACT suggest that the developers be required to build the A281 bridge over the canal to navigable height as a "planning gain" contribution under a Section 106 agreement.

The Trust's opinion is that restoration of the canal in the vicinity of DP should be listed among those matters required under Section 106. The Trust notes with regret that the water storage facilities on the DP site are much reduced from earlier versions of the scheme. These would have helped to keep the summit level topped-up in the drier summer months.

The Trust also notes that the application mentions the possibility of transporting timber by water from Chiddingfold Forest to the 3.5Mw CHP plant on site. The application implies that this must wait for the Trust to reach this stage of restoration but more positive help will be needed. Trust members' generosity will be taken up with rebuilding the seven locks between DP and Loxwood for many years yet. Each lock, at 2008 prices, costs about £230,000 even with volunteer labour.

- 8.31 **RSPB** is concerned that the proposed development could have an adverse effect on the populations of woodland specialist birds in the area. Woodland

birds in the South East are in severe decline, the suite of woodland indicators species fell 19% between 1994 and 2006 in this region compared to a national decline of 7%, urgent action is needed to reverse this trend.

They would welcome provisions within the application to retain and manage the wooded compartments that support these species. Similarly farmland specialist bird species common in the locality have in the South East reached a dramatic 21% decline against a national decline of 7%. The RSPB would welcome retaining some features that should support these species where practicable such as dense hedgerows next to grassy margins.

In terms of urban species the RSPB consider that it may be possible to mitigate against some impacts on these species through measures being put in place within the development. These may be simple features such as nestboxes or appropriate location, design and management of greenspaces within the development.

8.32 **British Horse Society** No comments received.

8.33 **Ramblers Association** No comments received.

#### Parish Council responses

8.34 Alfold Parish Council

The Parish object in the strongest possible terms to the proposal for the following reasons:

- There is no real need to depart from planning policies and common sense to allow such a massive development to take place over the next ten years. Other sites may be more suitable for this scale of development that are closer to major transport links and would therefore not incur the drastic and irreversible damage to surrounding areas.
- The site is not suitable for the development and the Parish consider that the aerodrome as a whole should not be regarded as “brownfield” land.
- The A281 is already at saturation point and the substantial increase in traffic arising from the development would be intolerable and unsafe.
- A development of 2,601 houses would place an unacceptable strain on the already fully utilised services such as hospitals and schools. The limited additional services proposed would fall far short of alleviating this issue.
- The ability of the development to support the costs associated with the improvement and expansion of the infrastructure is questioned.
- A conurbation of this size is completely unacceptable in this rural area of small villages.
- There is no economic or employment need for such development within the locality.
- The measures to limit residents’ cars and traffic movements is questioned as is the applicant’s statement that the majority of residents would be employed on site.
- The proposal is not considered to be sustainable because of the inevitability that employees will move jobs, the lack of public transport will mean residents will use cars and congestion on the A281 will mean local roads being used as “rat runs”.

### 8.35 Dunsfold Parish Council

The Parish Strongly objects to the proposal on the following grounds:

- The proposal is contrary to present and emerging Local, County, Regional and National planning policies. These policies should be upheld in this special area which is part of and adjacent to or surrounded by AONB and West Weald landscape.
- The benefits of the proposal do not outweigh the conflict with the development plan.
- The site was rejected by the Panel examining the South East Plan.
- Waverley's additional dwellings and affordable housing requirement should be met by the policy of limited building within existing towns and settlements where new housing is required.
- The harm flowing from the development will be devastating for this area. A new settlement will wholly unbalance the area and be intrusive and inappropriate to the rural setting.
- The site does not have high quality transport links and is remote from local services and public transport.
- The local rural road network cannot cope with existing traffic and will not be able to cope with the inevitable huge increase in traffic from the new settlement. There is no prospect of the road network being improved to the required level.
- The adverse effect on the road network will be felt well beyond the A281.
- The proposals rely on unworkable, self-containment and hypothetical and unenforceable policies to reduce the need to travel.
- There is no planning need or justification for this development.

The Parish also make a number of detailed observations about misconceptions in the application, the planning status of the site, the unique rural area, planning policy considerations, the applicant's justification for an exception to policy and the claimed eco and biodiversity benefits.

### 8.36 Cranleigh Parish Council

The Parish strongly object to the proposal on the following grounds:

- Inappropriate development in the countryside contrary to local and national planning policies.
- Introduction of undesirable urban development into a predominantly rural setting.
- Harmful and detrimental to the special and distinctive characteristics of the area and nearby village of Cranleigh.
- Adverse impact on the quality of life and amenities of residents of Cranleigh by virtue of the dependency on the facilities and infrastructure of Cranleigh.
- Encouragement of urban sprawl and adverse impact on the identity of Cranleigh.
- Increased and unacceptable pressure on the A281 which is already close to capacity at peak hours and unlikely to be able to safely accommodate additional traffic movements.
- Despite claims to the contrary the development will have an over-dependency on the car for transport.
- The development is detrimental to the amenity of residents by virtue of increased noise, dust and heavy traffic movements.

- There are strong reservations regarding the findings of the Traffic Assessment and believes that the increase in traffic movements may have been misrepresented and grossly underestimated.
- The rural lanes between the site and Cranleigh are entirely unsuited to increased traffic resulting from the proposed frequent bus service.
- There are long standing traffic problems and congestion on Cranleigh's roads that will be exacerbated by increased traffic movements between the new settlement and Cranleigh.
- The village centre car parks are insufficient to accommodate extra vehicles and further traffic will bring the High Street to a standstill
- Mindful of the increasing cost of food the site should be returned to agriculture.

#### 8.37 Hascombe Parish Council

The Parish strongly objects to and opposes the application for the following reasons:

- The proposal is contrary to present policies of the Borough and County Councils, Regional and National Government. Waverley is not a growth point and there is no need for the new settlement. If conditions change and a substantial increase in housing is required then all possible locations which are close to transport links and other infrastructure should be considered.
- New development should be concentrated on the regeneration of towns and cities.
- This rural locality should be protected from development.
- The A281 is already at saturation point and the substantial increase in traffic arising from the development would be intolerable. The volumes of traffic used is much underestimated and should be challenged.
- The development will place a large strain on the entire local infrastructure

#### 8.38 Chiddingfold Parish Council

The Parish object vigorously to the proposal on the following grounds

- Traffic: the local roads are not capable of supporting the volume of traffic which will use them during construction and afterwards. The quickest way to the A3 through Chiddingfold has not been taken into consideration.
- Public transport: the most convenient railway station is Witley and all traffic would have to go through Chiddingfold.
- Environment: all traffic movement will have a devastating effect on the ecology of the area.
- Infrastructure: even with proposed water recycling and rainwater harvesting the demand for water from the development will aggravate the problem of water supply and place further burdens on local infrastructure such as sewage, hospitals and secondary education.
- Housing: the affordable housing provision is in the wrong place. Survey results show that villagers want affordable housing near their family in the village not miles away.

#### 8.39 Rudgewick Parish Council

The Parish object to the unsuitability of the proposed development both regarding its position and feasibility and on the following points:

- Eco towns should have easy access to nearby major sustainable settlements to ensure travel is kept to a minimum. Commercial and domestic goods and

materials will all have to come by additional transport outside the area from larger towns.

- The network of surrounding roads are country lanes
- No provision is made for householders who exceed the maximum allocation of motor vehicles.
- The majority of the 14,300 daily vehicle trips will use the A281 where there are considerable hold ups and the increase is unsustainable.

#### 8.40 Busbridge Parish Council

The Parish is concerned that the local infrastructure is quite unable to provide the support that the development will require. Local country roads are already overcrowded as are services such as primary health care, schools, library and hospitals. Concern is also raised in respect of the effect of the development on flooding.

#### 8.41 Witley Parish Council

The Parish has serious concerns about a development of this site in the Surrey countryside and the impact it will have on the local road network. It is felt that the development is not necessary to fulfil the building criteria for Surrey.

#### 8.42 Ewhurst Parish Council

The Parish Council is wholly opposed to the application. Of prime concern are access, infrastructure and utilities all of which are inadequate, and they are concerned for the impact these shortfalls would have upon the neighbouring communities. They also object on the grounds that:

Traffic: The A281 is already over- burdened; extra traffic would grid-lock the villages. This is not what living in the countryside is about!

The site: is surrounded on all sides with Countryside beyond the Green Belt, AGLV, Conservation Areas and Sites of Nature Conservation.

Conflict with Planning Law: Fantastic as this conception is, this futuristic settlement, is not sufficiently meretricious to outweigh Planning Policy.

Creating burdens/environmental changes upon the residents of the neighbouring communities will only alienate the cause. Various fundamental matters need re-visiting.

The Parish Council would welcome a future application to ratify and clean-up the messy site at Dunsfold Aerodrome – something a tad more in tune with the locality.

#### 8.43 Loxwood Parish Council

The Parish Council is deeply concerned that the proposed development, if permitted, will have a substantial adverse impact on the residents of the Parish and that there are material and fundamental objections to the scheme which justify the refusal of the Application. The main points of objection are:

- Prematurity, a scheme of this scale should be considered in the form of a strategic option in the Waverley Local Development Framework Core Strategy and tested by the sustainability appraisal process. The determination of the application in the context of current policy must inevitably be resisted on grounds of prematurity.



- Locational Deficiencies, there is no presumption that unsustainably located brownfield land should be afforded priority in terms of site selection and allocation. Dunsfold Park is not sustainable in terms of size or location. It has not been demonstrated why new development proposed at Dunsfold could not be more sustainably located within, or as urban extensions to, the nearby established towns. The introduction of large scale urban development into a predominantly rural area will harm the countryside and create unnecessary pressures on rural resources.
- Traffic, the location of Dunsfold Park will give rise to impacts over a wide area. Notwithstanding the measures claimed to reduce private car use and traffic generation, a new settlement of this scale is bound to result in increased traffic movements in the surrounding area. The generation of such increased traffic movements is totally unacceptable to the local community.
- Precedent – The proposal reflects an attempt to circumvent the emerging planning framework provided by the as yet unadopted South East Plan and LDFs such that any permission granted would undermine the statutory process. If granted it would serve as a harmful precedent by encouraging other speculative schemes to come forward.

#### 8.44 Bramley Parish Council

The Parish Council strongly object to the proposal on the following grounds:

- The development would inevitably create a major increase in the level of traffic along the A281. Even with the anti-car measures proposed in the application, the applicant's own forecasts indicate that daily traffic flows through Bramley increase from 20,288 in 2006 to 23,619 in 2022 without Dunsfold Park and to 28,890 in 2022 with the development, a rise of 22% by 2022 attributable to Dunsfold Park. Peak morning flows are forecast to increase by over 60% of which increase the great majority would be attributable to Dunsfold Park. No account has been taken of any other significant developments and the Parish consider the underlying traffic assumptions and extrapolations to be heroically favourable to the application, but even so, disastrously and dramatically detrimental to Bramley.
- Any significant development south of Bramley is going to have a catastrophic effect on the village and its road infrastructure in the absence of radical solutions being agreed and built before further residential or commercial construction commences.
- The traffic problem through Bramley is likely to be further exacerbated by the potential development of 2000 new houses at Broadbridge Heath on the A281 and included within the West of Horsham agreed Masterplan. The road system simply will not be able to cope in the event that any further development was to be allowed at Dunsfold Park. It would inevitably cause gridlock, sound the death knell of Bramley as a village and ruin the vibrant community.
- In looking at traffic flows through Bramley the natural route to or from the M25, A3, Woking and Guildford passes through Bramley en route to Dunsfold Park and yet no provision is made in the application to address this nightmare in the event that the development were to proceed. An in depth strategic review of the roads infrastructure in the area should be undertaken before any further significant development is permitted to the south of Bramley.

- The Parish Council's view is that local, regional and central Government planning policies are drawn up after much consultation and for a reason. Simply building a new development in the middle of nowhere just because there is some spare land there, without a proper infrastructure or any evidence of sustainability and in contravention of all the relevant planning policies, would be sheer lunacy.

#### 8.45 Shere Parish Council

The Parish Council object to the proposal on the following grounds:

- Despite the applicant's plans to limit the use of private cars so many homes would significantly increase traffic on narrow lanes ill suited to the task.
- The development could lead to the Tillingbourne catchment becoming over abstracted.

#### 8.46 Shalford Parish Council

No specific objection is raised but the Paris Council have concerns about the level of additional traffic using the A281 through Bramley and Shalford.

#### 8.47 Plaistow and Ifold Parish Council

The Parish Council object to the proposal on the grounds that:

- Dunsfold was a wartime airfield and then an aircraft production centre it isn't all brownfield land.
- It is difficult to evaluate the gains for the community from the proposed development and hence any impact would be unacceptable. The importance of the proximity to Chiddingfold Forest SSSI would appear to have been under accounted for.
- The existing road network in all directions from the proposed site is inadequate for its current demands. Pressure on the A281 and B2133 will be significant. The solution proposed is unrealistic.
- The proposal is contrary to current planning policy.
- The injection of a new town in the midst of the countryside and small settlements will have an unbalancing effect and will be detrimental to all those living in the locality.
- The proposal will also have other effects on the provision of water, light pollution, sustainability, damage to wildlife, construction issues

## 9.0 Representations

### 9.1 CPRE (Surrey and Waverley Branches)

Strongly objects on the grounds that the development is contrary to planning policy, the proposed new settlement has been rejected by the Panel examining the South East Plan and by Government as an Eco town. The concept of a new settlement is fundamentally flawed. Detailed objections are made under the headings of sustainability, traffic, eco arguments, housing numbers and infrastructure cost. The CPRE also considers that the aerodrome site is not a “brownfield” site as it is mostly open countryside deserving of protection as the development will be visible from the AONB to the north. Only the existing buildings on the northern side of the main runway should be considered for mixed industrial and office use and it should not be developed for housing. The remainder of the site should continue to have predominantly rural uses.

### 9.2 Guildford Environmental Forum (GEF)

Support the application on the grounds that it is an exemplar of sustainable development that goes well beyond other developments of similar size planned in the southeast. The applicants have taken the best low and zero based carbon solutions from across Europe and applied them to Dunsfold Park. The transport solutions will more than adequately address necessary modal shifts away from the car beyond the site boundaries and result in lower impacts on adjacent roads than other developments in the area designed to provide 2,600 homes whether on one site or multiple sites.

The GEF highlight a number of points that include the objectives of PPS1 and 3 being fully met, the site is “brownfield and there would be no loss of “greenfield” land, further jobs will be created, homes would be constructed to CSH level 6 in advance of the government’s 2016 target, the development is zero carbon, the multiple on-site transport solutions are innovative, off-site car use is minimised and will be monitored and an all weather cycle route will be provided to Cranleigh.

### 9.3 Bramley Village Society

The Society has restricted its comments to matters that affect Bramley village. They object to the proposal on the grounds that the proposed improvements to infrastructure do not go far enough particularly with regard to traffic. The goods vehicle traffic associated with the existing businesses at Dunsfold is already a problem and the increase in traffic through the village during construction and thereafter will aggravate the problem of traffic through narrow streets. The only way this could be cured is a feeder road to the A3. The proposal for extra buses to Cranleigh is significantly insufficient and will not serve enough destinations to encourage use instead of the motor car.

### 9.4 Stop Dunsfold Park New Town (SDPNT)

SDPNT strongly object to the proposal on the following grounds:

- Location and character of the site – the site is in a remote rural location amongst beautiful countryside completely unsuitable for a new settlement.
- Planning background – a new settlement conflicts with all local, regional and national planning policies and Government guidance and there are no good reasons for a departure.

- Environmental impact, infrastructure and services – many infrastructure problems will be created particularly to the road system.
- Quota and location of new housing in Waverley – more affordable housing is supported but it should be sited, together with open market housing, in the existing towns and villages not in a new rural settlement.
- Sustainability and “green” credentials – a new settlement of 2,602 homes fails the Government’s test on sustainability.
- Alternative uses of the site- the applicant should work with the local community to find acceptable alternative use for the site.
- Opposition – comes from a wide ranging cross section of local residents and others who love and use this part of the countryside.

Each of the above points is amplified in detail in the letter of objection.

- 9.5 Holy Trinity Amenity Group – are concerned at the detrimental impact this proposal could have on the route to Guildford. The A281 is already extremely crowded with enormous tailbacks at peak times. The traffic jams have knock on effects to other roads causing delay and spoiling the environment for pedestrians. The road and associated infrastructure cannot handle more traffic; alternative routes should be developed.
- 9.6 Farnham Labour Party – support the application and welcome the initiative to provide much needed affordable homes. They consider that the need for affordable housing and eco friendly scheme should be granted permission. They support an all-inclusive school rather than the proposed sectarian/faith school, they would like to see affordable homes evenly distributed around the development and the application should be conditional on improved road and rail links to Guildford, Horsham and Cranleigh.
- 9.7 Friends of Cranleigh  
Strongly object on the following grounds:
- Local roads would not cope with the additional traffic. The A281 does not have capacity for additional private and commercial traffic and the smaller lanes leading to Cranleigh will be unable to cope. Traffic in the village centre is already at capacity.
  - Local infrastructure is insufficient and at or above capacity, for example there is insufficient car parking provision in Cranleigh and car parks regularly over flow.
  - Reliance and additional pressure on local services will negatively impact on the amenities and quality of life for Cranleigh residents.
  - The site has already been rejected as unsuitable by numerous planners and politicians.
  - The proposal will set a precedent for urban sprawl and ultimately lead to the urbanisation of the area between Dunsfold and Cranleigh.
  - The proposal is in conflict with all local, regional and central government planning policies and would lead to loss of countryside and rural amenity.
- 9.8 The Guildford Society  
Object on the grounds that it would be inappropriate to permit development on this scale in a proposal that failed to qualify for the Eco Town shortlist. In the absence of Eco Town status, inclusion of green measures in this application

does not justify development in a location that would not otherwise be developed on this scale. The proposed settlement would have an impact on and rely upon services in Guildford and that Guildford's infrastructure does not have the capacity to provide these. Concern is also raised about the adverse traffic impact on the A281 and that the Transport Assessment junction analysis does not show the predicted impact on the Guildford gyratory.

9.9 The Loxwood Society

Object on the grounds that the site is in the countryside beyond the Green Belt and the land should be protected from development for its own sake, the level of affordable housing exceeds that for rural exception sites, the draft Regional Spatial Strategy, Structure Plan and Local Plan make no provision for a new town to the south west of Cranleigh, the SEP Panel and Government have rejected the site for a new settlement/eco town, the development would still mean that commuting to other places of work will take place, the development does not meet the sustainability requirements of PPS3, and a new town of this scale will increase the burden on local village services and increase traffic flow on rural lanes and the A281.

9.10 East Guildford Residents Association

Object to the proposal on the grounds of the huge increase in traffic using the A281 into and out of Guildford and the severe impairment of the amenity of people living near the road.

9.11 Shalford Conservation Society

Raise concerns about whether the proposed small township could be sufficient and residents would have to look to the nearest towns to provide them with a livelihood, shopping and train stations. This will lead to an enormous increase in traffic density on the A281 that is already overstretched.

9.12 Guildford and Waverley Friends of the Earth

Support the principle of a mixed-use eco development at Dunsfold Park on the basis that it is a brownfield site with an employment use. The master plan and transport strategy is a genuine attempt to look to the future and encourage alternative means and patterns of transport. The transport strategy is radical and visionary and a model of likely future best practice. The vision is deliverable and achievable and maximises the prospects of significant modal shift away from car based journeys and maximises the prospect of a live/work environment. They consider that the development answers a material demand both for affordable housing and market housing in the southern part of the Borough and the development is an exemplar of sustainability and quite unique in the UK in the comprehensiveness of its proposals for sustainable living.

9.13 2.470 Letters and emails have been received objecting to the proposal on the following grounds:

- The size and impact of the development will have a significant and detrimental effect on already over-strained resources and infrastructure.
- The surrounding roads are already congested and under pressure.
- DCLG rejected the applicant's eco town bid.

- The SEP Panel rejected the Dunsfold Park proposals on the grounds that the local road network would not be capable of being improved and it would be difficult to secure the level of self-containment to overcome these disadvantages.
- The proposal conflicts with the Structure and Local Plans.
- The quiet, rural and idyllic nature of surrounding villages would be jeopardised.
- There is no need for a new town at Dunsfold.
- There is no point placing an eco town in the middle of the countryside if it means people driving miles to work.
- Dunsfold aerodrome is not all brownfield land.
- The A281 is already congested during rush hours and access to it would prove highly dangerous.
- The development will not achieve anything like the targeted improvements to travel planning.
- The transport proposals do not reflect the flexibility of car transport in a rural environment and are unlikely to be a viable alternative.
- Social housing is needed for the indigenous families in and around local towns and villages where infrastructure is already established.
- It would be better to build affordable housing where it is needed.
- The location may be beyond the Green Belt but it is still a sensitive rural location with local SSSIs and important ecological areas close by.
- The development is too small to be truly self sufficient.
- New housing should be spread across the Borough to allow towns and villages to grow and adapt gradually.
- Expanding the employment development on the site will increase commercial traffic on the A281 and local roads to an unacceptable degree.
- The location and size of the development is inappropriate.
- The site should be returned to agricultural use.
- The site should be kept as an airfield.
- The existing uses are far more preferable.
- The new settlement would be visually intrusive and destroy the tranquillity and character of the area for ever.
- A development of this size without a cultural context would result in a soulless environment.
- A new settlement would increase the burden on already over stretched services such as hospitals and schools.
- Increased traffic arising from the development will exacerbate local difficulties on the roads in Cranleigh.
- If permitted a precedent will be set for further development around Cranleigh.
- Train services in the locality are already unbearably overcrowded and this will be exacerbated.

9.14 320 proformas have been received objecting to the proposal on the grounds that:

Road infrastructure. The existing road structure cannot cope with the additional traffic that will be generated. There are no plans to improve the roads other than the construction of a new access from Dunsfold Park to the A281.



Planning policy. The proposal is in conflict with all local, regional and central Government planning policies – in particular The Waverley Borough Local Plan 2002, The Surrey Structure Plan 2004 and the draft South East Plan. There are no good grounds for departing from these planning policies.

Situation. The site is relatively remote and rural and almost entirely surrounded by an Area of Great Landscape Value as well as being on the edge of the Green Belt. It has Sites of Special Scientific Interest and other ecologically sensitive areas around it and to the east there are substantial areas that are liable to flooding.

Services. The resultant increase in the population will impose an excessive additional burden on local services such as hospitals, schools and railways.

Wrong place. Housing on this scale should not be lumped together in one remote rural location. In particular the affordable housing required to meet local needs should be built in the existing towns and villages in Waverley where it is needed.

Many of these also object for other reasons that have been included under paragraph 9.11 above

9.15 78 letters and emails have been received supporting the proposal on the grounds of:

- There is a desperate need for affordable housing in the locality.
- The opportunity for local people to stay in the area rather than move away to find a home.
- The need for housing close to existing businesses at Dunsfold Park reducing travel distances to work.
- A new settlement is preferable to cramming new homes into existing towns and villages. It will provide 50% of the homes needed in the Borough to 2026.
- The environmental benefits of living and working on the same site.
- The level of thinking and planning behind the proposal is way ahead of national and international norms.
- The development would be a real model for the way society needs to develop in the future.
- This is a suitable and sensible use of a brownfield site in an eco-friendly and imaginative way.
- The development will go a long way towards meeting Waverley's obligations.
- The opportunity to support children who need a different approach to learning in a village environment (Jigsaw School).
- The provision of subsidised transport links will help alleviate potential transport problems.
- The proposal has many benefits to the local community and should be supported.
- The development would be the best thing that could happen to the villages of Alfold, Dunsfold and Cranleigh.
- This is a gift horse for the Council, a section 106 agreement should be concluded to re-open the Cranleigh – Guildford railway, expand schools, secure improved health services and infrastructure in nearby villages.
- Fears of the effect on the A281 are exaggerated.
- Refusal of permission would mean that the site cannot financially sustain the local businesses which have been established at the site.

- The benefits of the development outweigh the impact on infrastructure.
- The green credentials of the proposal should be supported.
- The proposal is consistent with action 10 of the Council's Climate Change Action Plan.
- The development will assist the maintenance of existing local services.
- The site is not Green belt but brownfield land and the opportunity for building a forward thinking settlement shouldn't be passed up.
- This is a thoughtful and environmentally sensitive proposal that deserves support.
- The proposal is a very good plan for the settlement and associated infrastructure and employment.
- The smallish size of the settlement will enable much benefit for biodiversity and access to the countryside.
- The reconstruction of the Wey and Arun canal is supported.
- A new settlement will take some pressure off the larger settlements surrounded by Green Belt and the urbanisation of Cranleigh.
- It is unrealistic to expect the site to be returned to open countryside and the proposal represents an opportunity to secure the opening of the Cranleigh – Guildford railway line.

**Supporting information provided with the application**

Volume 1: Planning Statement	April 2008
Volume 2: Design & Access Statement	April 2008
Volume 3: Environmental Statement	April 2008
Volume 4: Flood Risk Assessment	April 2008
Volume 5: Housing Strategy	April 2008
Volume 6: Housing Land Supply Assessment (amended)	April 2008
Volume 7: Transport Strategy	April 2008
Volume 8: Transport Assessment	April 2008
Volume 9: Travel Plan	April 2008
Volume 10: Carbon Assessment	April 2008
Volume 11: Economic Development, Shops and Services Strategy	April 2008
Volume 12: Open Space, Recreation and Access to Nature Strategy	April 2008
Volume 13: Construction Report	April 2008
Volume 14: Energy Strategy	April 2008
Volume 15: Water Strategy	April 2008
Volume 16: Waste Strategy	April 2008
Volume 17: Sustainability Appraisal of Alternative Locations	April 2008
Volume 18: Sustainability Appraisal of Masterplan Options	April 2008
Volume 19: Statement of Community Involvement	April 2008
Volume 20: Draft Section 106 Heads of Terms	April 2008

**Background papers**

Planning application WA/2008/0788 and all accompanying plans, documents, consultee responses and representations.

Planning history of the site

Regional Planning Guidance for the South East (RPG 9)

Regional Spatial Strategy 2004

Draft South East Plan July 2006 and EiP report August 2007

SoS's Proposed Modifications to the South East Plan (July 2008)

Surrey Structure Plan 2004 (saved policies)

Waverley Borough Local Plan 2002 (saved policies)

Government Planning Policy Statements and Planning Policy Guidance (see appendix C) and supporting Good Practice Guides and associated documents

SCC	Surrey Design Guide 2002
SCC	A Parking Strategy for Surrey March 2003
SCC	Guidance on Structure Plan policy SE2 July 2005

Waverley BC	Urban Housing Potential Study 2005
Waverley BC	Housing Needs Survey 2005
Waverley BC	Housing Land Availability Study April 2005
Waverley BC	Density and size of dwellings: Policy H4 of the WBLP SPD Oct 2003
Waverley BC	The Waverley Borough Cycling Plan SPD April 2005
Waverley BC	Housing Land Availability Statement December 2005
Waverley BC	Planning Infrastructure Contributions SPD April 2008
Waverley BC	Annual Monitoring Report 2006/07
Waverley BC	Housing Needs Survey 2001 and 2003 & 2005 updates
Waverley BC	Development Control Consultative Forum meetings

## DEVELOPMENT PLAN POLICIES

**South East Plan** *(note: the Secretary of State's proposed modifications, where relevant, are included in italics)*

- CC1 Sustainable development – The objectives are to achieve a sustainable economy, promote good governance, use sound science responsibly, live within environmental limits and ensure strong, healthy and just society.
- CC2 Climate change – promotes measures to mitigate and adapt to the forecast effects of climate change. Behavioural change is essential in implementing this policy and mitigation, through reducing greenhouse gas emissions, will primarily be addressed through greater resource efficiency including improving energy efficiency performance of new and existing buildings, reducing the need to travel and ensuring good accessibility to public and other sustainable modes of transport encouraging development and use of renewable energy and reducing the amount of biodegradable waste landfill.
- CC3 Resource use – promotion of measures to stabilise and reduce the South East's ecological footprint.
- CC4 Sustainable Construction - promotes sustainable construction standards and techniques. *(SoS mods: add Design to the title and the use of energy supply from decentralised and renewable or low carbon sources).*
- CC5 Infrastructure and implementation – the scale and pace of development will be dependent on there being sufficient capacity in existing infrastructure to meet the area's current needs and the provision of new infrastructure to meet the needs of new development. Development shall not proceed until the planning authorities are satisfied that the necessary infrastructure required to serve the development is available or will be provided in time. Contributions from development will also be required to help deliver the necessary infrastructure. *(SoS mods: policy renumbered CC7 and changed to emphasise the close relationship between development and infrastructure; refer to a more proactive approach to pooling, tariffs and local delivery vehicles and refer to the need jointly to develop forward funding mechanisms and the role of demand management).*
- CC8a Urban Focus and Urban Renaissance - outlines that the prime focus for development in the South East should be urban areas, in order to foster accessibility to employment, housing, retail and other services, and avoid unnecessary travel. In particular development should be concentrated within the region's urban areas and should seek to achieve at least 60% of all new development in the South East on previously developed land. *(SoS mods: policy renumbered as SP3)*
- CC12 Character of the Environment and Quality of Life - prescribes that actions and decisions associated with development and the use of land should actively encourage the conservation, and where appropriate the enhancement of the character, distinctiveness, and sense of place of settlements and landscapes throughout the region. Opportunities for creating a high quality environment should be sought, based on a shared vision that places emphasis on good design, innovation, sustainability and achieving a high quality of life. *(SoS mods: policy renumbered CC6 with Sustainable Communities in title).*
- RE2 Employment and Land provision – local authorities should assess the employment needs of the local economy in the LDDs. Policies should, amongst other things, be based on the criteria that; locations that are accessible to the existing and proposed

labour supply, make efficient use of existing and underused sites and premises, they could be locations which intensify the use of existing sites, focus on urban areas and be locations that promote the use of public transport. (SoS mods: *policy renumbered RE3 and amended to include locational criteria for identifying new employment land*).

- RE4 Information communications technology (ict) and changing working practices - local authorities through LDDs will support and promote advances in ICT and changing working practices by positively promoting the development of ICT-enabled sites, premises and facilities suitable to support changing and flexible working practices and home based businesses. (SoS mods: *Policy incorporated into new policy RE5 Smart Growth. The basic aim being The achievement of smart economic growth will be encouraged throughout the region, namely to increase the regions prosperity while reducing the rate of increase in its ecological footprint*).
- RE5 Addressing intra-regional economic disparities – commitment to actively seek to maintain and enhance the competitiveness of the most economically successful parts of the region and also address structural economic weakness to release the economic potential of those areas which are under performing. (SoS mods: *policy renumbered RE6 and titled Promoting Competitiveness and Addressing Structural Economic Weakness. The aim being to encourage smart growth in those areas that are under performing as well as in the most economically successful parts of the region*).
- H1 Housing Provision - outlines the house building figure for 2006 – 2026 across the southeast and that there should be 230 net additional new dwellings per annum in Waverley. The Panel Report recommends increasing this to 250 dwellings per annum. (SoS mods: *no substantial change*).
- H3 The Location of Housing - encourages mixed-use development, in sustainable locations that are, or can be, served by a choice of transport modes and which have the necessary infrastructure, services and community provision to serve the development. The Policy states that at least 60% of all new housing to 2026 within the region should be on previously developed land. (SoS mods: *deleted on the grounds of repetition*).
- H4 Affordable Housing - sets out the importance of high quality design, in order to make good use of available land and encourage more sustainable patterns of development and services, higher housing densities are to be encouraged, with an overall regional target of 40 dwellings per hectare. (SoS mods: *policy renumbered H3, text amended to include regional target of 25% social rented and 10% other forms of affordable homes*).
- H5 Housing Density and Design - encourages a mix of housing type and size. (SoS mods: *Design added to title, with regional target of 40dph and advice for higher densities in areas of high accessibility*).
- H6 Type and size of new housing – requires local authorities to identify a full range of existing and future housing needs in their areas, in the form of housing need and market assessments. Such needs should include those of elderly and disabled people, students, black and minority ethnic households, families with children and other specialist requirements. LDDs should require an appropriate range of housing opportunities in terms of a mix of housing types, sizes and tenures. (SoS mods: *policy renumbered H4 and updated to reflect PPS3 and associated guidance*).
- T1 Manage and Invest – relevant strategies should achieve a rebalancing of the transport system in favour of non-car modes as a means of access to services and facilities, encourage development that is located and designed to reduce average journey lengths, include measures to minimise negative environmental impacts of transport and, where possible, to enhance the environment and communities through such interventions.

- T2 Rural Transport - Local Transport Plans should take a co-ordinated approach to encouraging community-based transport in areas of need, include looking for opportunities to improve provision for cyclists and pedestrians between towns and their nearest villages and develop innovative and adaptable approaches to public transport in rural areas that reflect the particular and longer-term social and economic characteristics of the region. (SoS mods: policy renumbered T7)
- T5 Mobility Management – LDDs will seek to achieve a rebalancing of the transport system in favour of non-car modes and will be based on an integrated package of measures. (SoS mods: policy renumbered T2 with an emphasis the importance of demand management).
- T7 Parking - deal with issues of transport at the regional level. The general thrust reflects guidance contained in PPS3 and PPG13. (SoS mods: policy renumbered T4)
- T8 Travel Plans and advice - All major travel generating developments must have a travel plan agreed and implemented by 2011. LDDs should identify those forms of development that require a Travel Plan. (SoS mods: policy renumbered T5 reference to all major travel generating developments deleted and change of emphasis for LDDs from should to must in order to strengthen the demand management message and the role travel plans can have in this).
- NMR1 Sustainable Water Resources, Groundwater and River Water quality management - requires that water supply, ground water and river water quality be maintained and enhanced through avoiding adverse effects of development upon the water environment (SoS mods: River quality management taken out to form new policy NMR2).
- NRM3 Sustainable Flood Risk Management - outlines that the sequential approach to flood risk areas set out in PPS25 is to be followed. Inappropriate development will not be permitted in zones 2 or 3 of the floodplain or in areas with a history of groundwater flooding, or where it would increase the likelihood of flooding elsewhere, unless there is overriding need and absence of suitable alternatives. Development should incorporate Sustainable Drainage Systems (SUDS), other water retention and flood storage measures to minimise direct surface run-off. (SoS mods: policy renumbered NMR4)
- NRM7 Air Quality - outlines ways in which development control can help to achieve improvements in local air quality. (SoS mods: policy renumbered NMR4)
- EN1 Development Design for Energy Efficiency and Renewable Energy - energy efficient materials and technologies to be used to provide at least 10% of the development's energy demand from renewable sources for housing schemes of over ten dwellings and commercial schemes of over 1,000m<sup>2</sup> and the attainment of high energy efficiency ratings. (SoS mods: policy renumbered NRM11 and amended to include promote and secure greater use of decentralised and renewable or low carbon energy in new development. The 10% threshold to remain until LDF's adopted).
- EN2 Combined Heat and Power - promotes the use of combined heat and power, including mini and micro CHP in all developments and district heating infrastructure in large-scale developments. (SoS mods: policy renumbered NRM12).
- W2 Sustainable Design, Construction and Demolition - local authorities should promote the re-use of construction and demolition materials and promote layouts and designs that provide adequate space to facilitate storage, re-use, recycling and composting.
- BE1 Management for an Urban Renaissance - promotes an urban renaissance and outlines the criteria local authorities should follow in producing their local development framework policies. (SoS mods: wording expanded in line with CABE's suggestions).

## **Surrey Structure Plan 2004**

- LO1 The Location of Development – new development to be primarily located within existing urban areas, through the re-use of previously developed land and buildings; directed to locations easily accessed without a car or appropriate measures introduced to ensure accessibility for those without a car.
- LO4 The Countryside and Green Belt – protection of the openness and intrinsic qualities of the countryside. Development outside urban areas should be in or near to local services and respect the character of the countryside.
- LO5 Rural Settlements - Limited development in rural settlements will be permitted where it contributes to meeting the social, economic and recreational needs of the local community, and its scale, layout and appearance maintains or enhances the character of the settlement.
- LO6 Housing provision - Waverley 2,810 new dwellings (April 2001 – March 2016) most of which should be through development of previously developed land.
- LO7 Employment Land – development needs of sustainable economic growth to be met primarily through re-use of suitably located land
- SE1 Natural Resources and Pollution Control – conservation and enhancement of designated areas and features of acknowledged importance. Development located and designed to promote the efficient use of energy and water and careful use of natural resources.
- SE2 Renewable Energy and Energy Conservation – residential development to be designed to achieve a minimum of 10% of energy requirement provided by renewable sources. All development to incorporate energy best practice in design, layout and orientation.
- SE4 Design and the Quality of Development – contribute to improvements to the quality of rural areas and retain features that contribute to sense of place. High standard of design where new residential development is of a density that makes best use of limited land resources. New development to give emphasis to the needs of pedestrians, cyclists and public transport users, thereby enhancing movement choice.
- SE5 Protecting Heritage - Surrey's valuable cultural heritage of buildings, sites and landscapes will be conserved and enhanced. Heritage resources are irreplaceable and development affecting them will only be permitted where it has been clearly demonstrated that there is an overriding need for the proposal which outweighs the need to protect the heritage interest, and that no alternative is possible.
- SE6 Biodiversity – to be conserved and enhanced and contribute to safeguarding and managing habitats.
- SE7 Nature Conservation – development will only permitted if mitigating measures can be put in place to prevent damaging impacts.
- SE8 Landscape – the quality of the AGLV is to be conserved and enhanced and the existing character maintained. Elsewhere development should retain the distinctiveness of the County Landscape Character Areas. Development is expected to improve areas where the landscape is becoming degraded.
- SE9 Trees and Woodland – new development should show how new planting and existing trees and woodland will be managed and integrated in rural areas.



- SE10 River Corridors and Waterways – development should conserve the character, setting and ecology and heritage of river corridors.
- DN1 Infrastructure Provision – infrastructure requirements of development to be identified in planning applications. Developers to provide or contribute to infrastructure improvements related to new development.
- DN2 Movement Implications of Development – development will only be permitted where it is compatible with the transport infrastructure in the area. The transport and environment implications of development should be assessed and measures to encourage walking, cycling and public transport incorporated in development proposals.
- DN3 Parking Provision – should comply with the aim of promoting sustainable travel choices by reducing land used for car parking and increasing cycle parking facilities.
- DN4 Public Transport – development that would result in the use of public transport will be supported.
- DN5 Cycle and Pedestrian Routes – LDFs to identify pedestrian and cycle networks to widen travel choice.
- DN9 General aviation – with the exception of Dunsfold Aerodrome new airfields or re-opening disused airfields will not be permitted. *(The text of plan advised that the future of Dunsfold Aerodrome would be settled through an action area plan).*
- DN10 Housing Type and Need – development should incorporate a mix of sizes and types of dwellings to contribute towards meeting the needs of the community.
- DN11 Affordable Housing – LDFs to incorporate a target for affordable housing, the objective being 40% of new housing provision. The provision should be based on evidence of local need and the supply of housing land.
- DN12 Social and Community Facilities – sites should be identified for social and community needs at locations easily accessible to the community being served.
- DN13 Leisure and Recreation Facilities – opportunities for informal recreation should be provided in conjunction with development.

### **Waverley Borough Local Plan 2002**

- D1 Environmental Implications – promotes and encourages enhancement of the environment. Development will not be permitted if it results in the loss of or damage to environmental assets, harms visual character and distinctiveness, loss of amenity, levels of traffic incompatible with the local highway network and potential pollution. Development should resolve or limit environmental impacts
- D2 Compatibility of Uses – development will not be permitted if it has a material impact on sensitive uses. Redevelopment will be encouraged where an existing use is causing material detriment to the character and amenities of the area.
- D3 Resources – encourages environmentally innovative schemes that conserve energy and water through location and design and minimises the use of non-renewable resources.
- D4 Design and Layout – high quality design sought that integrates well with the site and surroundings. Development should be appropriate in scale, height and appearance, be of a design and materials that respects local distinctiveness and makes a positive contribution to the appearance of the area, not significantly harm neighbouring

- properties, pay regard to existing features of the site, incorporate landscape design suitable to the site and character of the area, provide adequate amenity space and provide safe access for pedestrians and road users.
- D5 Nature Conservation – development should take account of nature conservation issues and retain any significant features of nature conservation value, not materially harm protected species or habitat and enhances existing and provides new wildlife habitats.
- D6 Tree Controls – significant trees and groups of trees to be protected and managed. Appropriate new planting to be required.
- D7 Trees, Hedgerows and Development – development should provide for the long-term retention of trees and hedgerows and include new planting.
- D8 Crime Prevention – development should contribute to safe and secure environments and reduce the incidence and fear of crime.
- D9 Accessibility – development involving buildings or spaces to which the public have access should provide or improve accessibility for everyone.
- D13 Essential Infrastructure – development will only be permitted where adequate infrastructure is available or where suitable arrangements have been made.
- D14 Planning Benefits – high quality development will be sought which delivers environmental and/or community benefits. The type of benefits include: affordable housing, improvements to public transport and measures for cyclists, walkers and pedestrians, social and educational facilities, enhancement of the rural environment, public and private recreational facilities, public art and any other facilities that comply with government advice.
- C2 Countryside Beyond the Green Belt – to be protected for its own sake and new building away from existing settlements will be strictly controlled.
- C3 AGLV (adjacent to north, west and south) – strongly protected to ensure the conservation and enhancement of landscape character.
- C6 Landscape Enhancement – securing improvements to the landscape particularly areas showing signs of landscape deterioration. This can be achieved through the control of development.
- C7 Trees, Woodlands and Hedgerows – maintenance/ retention of tree cover and hedgerows.
- C10 Sites of Nature Conservation Importance – development will not be permitted that affects sites of nature conservation importance unless it can be shown that it would not conflict with nature conservation interests. Account will be taken of measures to enhance, manage or protect nature conservation.
- C12 Canals and River Corridors – development will not be permitted that has a detrimental effect on the visual quality, setting, amenity, ecological value, heritage interest or water quality of the River Wey and Wey and Arun canal. Development should enhance river and canal corridors.
- HE10 Heritage Features – Heritage features will be protected and conserved by ensuring that new development is located and designed so as to preserve the features and if not possible to minimise damage and disturbance.
- HE14 Areas of High Archaeological Importance – development proposals in such areas should be accompanied by an assessment of the archaeological value.

- HE15 Unidentified archaeological sites – large-scale developments in excess of 0.4ha will require an archaeological assessment.
- H4 Density and size of Dwellings – at least 50% of new dwellings should be of 2 bedrooms or less, not less than 80% of 3 bedrooms or less and no more than 20% of all dwellings shall exceed 165m<sup>2</sup>. Densities below 30 dwellings per hectare will be avoided, densities of between 30 – 50 dph will be encouraged. Higher densities will be particularly encouraged at places with good public transport accessibility or around major transport nodes.
- H5 Affordable Housing within settlements – at least 30% provision for affordable dwellings is required within settlements. For development of a density in excess of 40dph the percentage of affordable housing is at least 25%.
- H6 Subsidised affordable Housing in the Countryside – allows small-scale rural exception sites within or adjoining rural settlements.
- H7 Special needs housing – the provision of supported housing for those with special needs will be encouraged. Such developments will be acceptable in principle in residential areas and other locations within towns and settlements.
- H10 Amenity and Play Space – residential development will incorporate amenity space adequate for the needs of residents. All dwellings should have access to a usable outdoor area and development incorporating family dwellings should make provision for children's play.
- CF1 Retaining Existing Community Facilities – redevelopment of community facilities will not be permitted unless the facility is no longer needed or adequate alternative facilities are provided in readily accessible locations.
- CF2 Provision of New Community Facilities – new facilities will be permitted within settlements provided the location is readily accessible, it maximises accessibility to people with disabilities and, where buildings house significant community uses, they are of a high quality design and create a landmark for the community they serve.
- CF3 Educational establishments – proposals for new or extensions to existing establishments will be permitted provided it would not materially detract from the character and appearance of the establishment itself or the area in general and all other relevant local plan policies.
- IC1 General considerations – proposals for industrial and commercial development will be permitted where the proposed development complies with other policies of the plan and in the light of whether the site is suitably located and is convenient for access to the public transport network and to local residents by walking and cycling.
- IC2 Safeguarding Suitably Located Industrial and Commercial Land - existing suitably located industrial and commercial land will be retained.
- IC4 Existing Industrial and Commercial Premises – existing suitably located industrial and commercial land can be redeveloped outside settlements where it does not involve a material increase in building bulk or floor space, does not occupy a materially larger site area, does not extend beyond existing principal buildings into open land, does not have a materially adverse effect on the countryside or amenity of nearby properties, has no detrimental increase in traffic and can achieve satisfactory vehicular access.
- IC12 Working from Home – care will be exercised when considering proposals to enable people to work from home.

- S1 Retail Development Sequential Test – major trip generating retail development should be located within the designated Town Centres.
- S2 Local and village shops – local and village shops are to be retained and expansion of existing shops or new retail development within local and village centres will be supported.
- S6 Food and Drink Uses – proposals will be permitted where individually or cumulatively such uses would not result in a materially detrimental impact on the character and appearance of the area or residential amenity.
- LT1 Retention of Leisure Facilities – the Council will retain leisure facilities where a clear need still exists for those facilities. Loss of recreational land will be resisted unless suitable alternative provision can be made.
- LT7 Leisure and Tourism development in the countryside – proposals for new leisure or tourism related development will only be permitted if its nature, scale, design and character is suited to the location and the activities do not harm the character of the countryside. Traffic generated by the development should not prejudice highway safety or cause significant harm to the environmental character of country roads.
- LT8 Sports Grounds and Playing Fields – the loss of sports grounds and playing fields to development will be resisted unless suitable alternative provision can be made.
- LT11 Walking, Cycling and Horse riding – designated rights of way will be safeguarded, protected and enhanced to encourage use by walkers and cyclists. The extension of public rights of way will be encouraged.
- RD1 Rural settlements – development will be permitted within rural settlement boundaries provided it meets certain criteria.
- RD7 Re-use and adaption of buildings in rural areas – re-use and adaption will be permitted provided certain criteria are met.
- RD15 Renewable Energy Installations – the benefits of the proposal will be weighed carefully with the need to protect the local environment and visual amenity and the tranquillity of the countryside.
- M1 Location of Development – development is to be located so as to reduce the need to travel, especially by private car and encourage a higher proportion of travel by walking, cycling and public transport. Major trip generating development is to be located in the major settlements; major trip generating developments will be resisted in rural locations
- M2 Movement Implications of Development – development proposals should provide for safe access for pedestrians and road users, including cyclists.
- M4 Provision for Pedestrians – conditions for pedestrians should be improved by providing or securing safe and attractive pedestrian routes and facilities in rural areas. Development should include safe, convenient and attractive pedestrian routes linking to existing pedestrian networks, open space and local facilities, amenities and public transport.
- M5 Provision for Cyclists - conditions for cyclists should be improved by requiring new development to provide cycle parking and safe, convenient and attractive cycle routes connecting to the Borough-wide cycle network.
- M9 Provision for People with Disabilities and Mobility Problems – the Council in conjunction with other organisations will seek to improve accessibility and movement for people with disabilities and mobility problems through promoting improved access and requiring

new development to provide allocated car parking spaces for people with disabilities and young children.

- M10 Public Transport and Interchange Facilities – the Council in conjunction with SCC will seek to retain and enhance public transport and interchange facilities through ensuring that the layout and design of major new development allows for convenient access by bus, provides for the needs of waiting passengers and supporting the provision of improved set down facilities, taxi ranks, secure cycle parking.
- M13 Heavy Goods Vehicles – the Council will seek to minimise the adverse impact of lorry traffic within the Borough. It will seek to locate developments which generate heavy goods vehicle movements where the infrastructure is capable of accommodating it.
- M14 Car Parking Standards – appropriate parking provision to be made having regard to the accessibility of the location to means of travel other than the private car.
- M15 Public Off-Street Parking – additional provision for public off-street parking will only be made where the demand is unlikely to be met by alternative measures and where such additional provision is not in conflict with other policies.
- M17 Servicing – development proposals will be required to make provision for loading, unloading and turning of service vehicles.

**Government Planning Policy Statements (PPS) and Planning Policy Guidance (PPG)**

<p><b>PPS1 Sustainable Development</b></p> <p>February 2005</p> <p>[also Sustainable Communities – Building for the Future. ODPM Feb 2003]</p>	<p>Sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system. The policies complement but do not replace or override other national planning policies. The four aims of sustainable development are:</p> <ul style="list-style-type: none"> <li>• social progress recognising the needs of everyone</li> <li>• effective protection of the environment</li> <li>• prudent use of natural resources</li> <li>• maintaining high and stable levels of economic growth and employment</li> </ul> <p>These aims are to be pursued in an integrated way through a sustainable, innovative economy that delivers sustainable communities. Planning should facilitate and promote sustainable and inclusive patterns of development by:</p> <ul style="list-style-type: none"> <li>• Making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life,</li> <li>• Contributing to sustainable economic development</li> <li>• Protecting and enhancing the natural and historic environment, the quality and character of the countryside and existing communities,</li> <li>• Ensuring high quality development through good an inclusive design and efficient use of resources</li> <li>• Ensuring development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all.</li> </ul> <p>A key role is the creation of sustainable communities; communities that will stand the test of time, where people want to live, and which will enable people to meet their aspirations and potential.</p>
<p><b>PPS3 Housing</b></p> <p>November 2006</p>	<p>Sets out the Government's policy for a new approach to planning for housing. It requires that Planning Authorities should:</p> <ul style="list-style-type: none"> <li>• plan to meet the housing requirements of the whole community including those in need of affordable and special needs housing,</li> <li>• provide a wider housing opportunity and choice and better mix in the size, type and location of housing and create mixed communities</li> <li>• provide sufficient housing land giving priority to re-using previously developed land</li> <li>• creating more sustainable patterns of development by exploiting accessibility by public transport</li> <li>• making more efficient use of land by reviewing planning policies and standards</li> <li>• place the needs of people before ease of traffic movement in residential design</li> <li>• seek to reduce car dependence by facilitating more walking, cycling and improving linkages to public transport</li> <li>• promoting good design in order to create attractive, high quality living environments</li> </ul>

	Existing towns and cities should be the focus for additional housing and they should make a significant contribution to promoting urban renaissance and improving the quality of life.
<b>PPG4 Industrial, Commercial Development and Small Firms</b>  November 1992.	Sets out the Government's approach to encouraging continued economic development in a way that is compatible with environmental objectives. Economic growth and a high quality environment have to be pursued together. In terms of location new employment development should be in locations which minimise the length and number of vehicle trips, can be served by more energy efficient modes of transport, avoids adding unacceptably to congestion.
<b>Draft PPS4 Planning for Sustainable Economic Development</b>  December 2007	<p>Consultation paper that indicating a potential new approach for Regional planning bodies and planning authorities to plan positively and proactively to encourage economic development, in line with the principles of sustainable development. Flexible policies are needed to respond to economic change and the need for co-ordination with infrastructure and housing provision.</p> <p>The draft PPS sees a need for proactive planning and a shared vision to help deliver homes and jobs, coordinate infrastructure investment and improve productivity, as well as a just society that promotes social inclusion, community cohesion and personal well-being. Regional planning bodies and planning authorities are to play a pivotal role as place-shapers within their communities. Through the preparation of sustainable community strategies, local area and multi-area agreements, local development frameworks and regional spatial strategies, local authorities, working with regional planning bodies, can help to ensure that positive, strategic planning is placed at the heart of the local authority, the local community and the local business community. The regional spatial strategy should support economic growth across the region and sub-region whilst the core strategy should support the local vision.</p> <p>As place-shapers these bodies can help to support economic growth in their area, address regional disparities, promote opportunities for regenerating deprived areas and focus on economic under-performance especially in those areas that have suffered from economic restructuring. Planning authorities should seek to make the most efficient and effective use of land and buildings, especially vacant or derelict buildings. They should also take into account changing working patterns, economic data including price signals and the need for policies that reflect local circumstances.</p>
<b>PPS7 Sustainable Development in Rural Areas</b>  August 2004.	<p>Sets out the Government's planning policies for rural areas, which local authorities should have regard to when preparing local development documents, and when taking planning decisions. Two of the four key objectives are:</p> <p>(i) to raise the quality of life and the environment in rural areas through the promotion of:</p> <ul style="list-style-type: none"> <li>• thriving, inclusive and sustainable rural communities</li> <li>• sustainable economic growth and diversification</li> <li>• good quality, sustainable development that respects and enhances local distinctiveness and the intrinsic qualities of the countryside</li> <li>• continued protection of open countryside for the benefit of all</li> </ul> <p>(ii) to promote more sustainable patterns of development by:</p>

	<ul style="list-style-type: none"> <li>• focussing most development in or next to cities and towns</li> <li>• preventing urban sprawl</li> <li>• discouraging greenfield development</li> <li>• promoting a range of uses to maximise the potential benefits of the countryside fringing urban areas</li> <li>• providing appropriate leisure opportunities to enjoy the wider countryside.</li> </ul>
<b>PPS9 Biodiversity and Geological Conservation</b>  August 2005	Government guidance on conserving and enhancing biological Diversity with the broad aim of minimising impact and enhancement where ever possible through: <ul style="list-style-type: none"> <li>• promoting sustainable development by ensuring biological and geological diversity are conserved and enhanced,</li> <li>• conserving, enhancing and restoring the diversity of English wildlife and geology,</li> <li>• contributing to rural and urban renaissance.</li> </ul>
<b>PPS10 Planning for Sustainable Waste Management</b>  July 2005	Government guidance on the general planning policy context for sustainable waste management. Sets out the material planning considerations for development control and that design and layout of new development should support sustainable waste management.
<b>PPS11 Regional Planning</b>  September 2004	Sets out the principles behind preparing a regional Spatial Strategy and that it should look at a 15 to 20 year period and identify the scale and distribution of new housing, priorities for the environment and take account of transport, infrastructure, economic development, agriculture, waste disposal and treatment.
<b>PPS12 Local Spatial Planning</b>  June 2008	Sets out the government’s policies on different aspects of spatial planning in England. The planning system has been substantially reformed to embed community responsive policy-making at its heart and to make contributing to the achievement of <i>sustainable development</i> a statutory objective. The new <i>spatial planning</i> system exists to deliver positive social, economic and environmental outcomes, and requires planners to collaborate actively with the wide range of stakeholders and agencies that help to shape local areas and deliver local services. The role of spatial planning is a process of place shaping and delivery. It aims to: <ul style="list-style-type: none"> <li>• produce a vision for the future of places that responds to the local challenges and opportunities, and is based on evidence, a sense of local distinctiveness and community derived objectives, within the overall framework of national policy and regional strategies;</li> <li>• translate this vision into a set of priorities, programmes, policies, and land allocations together with the public sector resources to deliver them;</li> <li>• create a framework for private investment and regeneration that promotes economic, environmental and social well being for the area;</li> <li>• coordinate and deliver the public sector components of this vision with other agencies and processes [eg LAAs];</li> <li>• create a positive framework for action on climate change; and</li> <li>• contribute to the achievement of Sustainable Development.</li> </ul>
<b>PPG13 Transport</b>	Government guidance that covers the integration of transport and planning through the promotion of sustainable transport



March 2001	choices, accessibility and reducing the need to travel, especially by car.
<b>PG15 Planning &amp; the Historic Environment</b>  September 1994.	Government advice on the controls and policy for the protection of historic buildings and conservation areas. The main aims are to provide effective protection for all aspects of the historic environment but conservation and sustainable economic growth are complementary objectives. Guidance is provided on the approach to be taken to development proposals affecting listed buildings, their setting and conservation areas together with an emphasis on the need to carefully consider the design of new buildings intended to stand alongside historic buildings. A general comment is made that it is better that old buildings are not set apart but are woven into the fabric of the living and working community.
<b>PPG16 Archaeology and planning</b>  November 1990.	Government policy and guidance on archaeological remains on land, how they should be handled and how they should be preserved or recorded.
<b>PPG17 Planning for Open Space, Sport &amp; Recreation</b>  July 2002	Government guidance on underpinning people's quality of life by providing for open space, sport and recreation. The key objectives are: <ul style="list-style-type: none"> <li>• supporting urban renaissance through local networks of high quality and well managed and maintained open spaces, sports and recreational facilities that create attractive, clean and safe urban environments,</li> <li>• promoting social inclusion and community cohesion,</li> <li>• health and well being and</li> <li>• promoting more sustainable development.</li> </ul>
<b>PPS22 Renewable Energy</b>  August 2004	Government guidance that covers those energy flows that occur naturally and repeatedly in the environment. It is also concerned with ensuring all homes are adequately and affordably heated, minimising greenhouse gases, the prudent use of natural resources.
<b>PPS23 Planning and Pollution Control</b>  November 2004.	Government advice on the consideration of the quality of land, air or water and potential impacts arising from development possibly leading to impacts on health.
<b>PPG24 Planning and Noise</b> September 1994	Government guidance on minimising the adverse impact of noise and the considerations to be taken into account in determining applications.
<b>PPS25 Development and Flood Risk</b> December 2006	Government guidance on how flood risk should be considered at all stages of the planning and development process.

**Full Consultation responses****Government Office for the South East (GOSE)**

A direction under Article 14 of the T&CP (General Development Procedure) Order 1995 has been issued that Waverley do not grant planning permission for the development or grant or deem permission for any development of the same kind on any land which forms part of or includes the site of the said proposal without the Secretary of State for Communities and Local Government authorisation.

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**South East England Regional Assembly (SEERA)**

Members of the Regional Planning Committee have considered the application proposals against the current adopted regional spatial strategy (RPG9 and Alterations) and the emerging RSS (the draft South East Plan) and agreed the following response.

The South East England Regional Assembly makes the following representations:

On the basis of the information provided, it is considered that the proposed development would materially conflict with Policies Q1 and H5 of RPG9 and prejudice the implementation of the Regional Spatial Strategy (RPG9 and Alterations) and the borough council should not grant planning permission. The proposal also materially conflicts with the objectives of Policies CC8a and H3 of the draft South East Plan and its release would prejudice the emerging Core Strategy DPD of the Local Development Framework.

If the borough council is minded to grant permission, it should secure the following through appropriately worded conditions and/or legal agreements:

- The phasing and delivery of community and other infrastructure appropriate to the scale of the development and to meet the needs of residents in accordance with Policy INF2 of RPG9 and Policies CC5 and NRM1 of the draft South East Plan;
- Delivery of appropriate affordable housing provision and an appropriate mix of dwelling types and sizes in accordance with Policy H4 of RPG9 and Policies CC11, H4 and H6 of the draft South East Plan;
- The adoption of key development principles for each phase of development to make good use of land and to secure a high quality of environment consistent with Policies CC12 and H5 of the draft South East Plan;
- An appropriate package of transport infrastructure and other measures including an agreed travel plan to promote alternatives to the car in accordance with Policies T1, T10 and T13 (RPG9 as altered) and T1, T5 and T8 of the draft South East Plan;
- An appropriate level of car and cycle parking to comply with Policy T12 of RPG9 (as altered) and Policy T7 of the draft South East Plan;
- The incorporation of water and energy efficiency measures and the promotion of renewable energy and sustainable construction in accordance with Policies INF2 and INF4 of RPG9 (as altered) and Policies CC2, CC3, CC4, NRM1, EN1, EN2, W2 and M1 of the draft South East Plan;

- Appropriate mitigation measures in relation to designated nature conservation sites that are acceptable to Natural England to comply with Policies E1 and E2 of RPG9 and Policies NRM4 of the draft South East Plan;
- Appropriate mitigation measures in relation to impact on the setting of this part of the Surrey Hills AONB in accordance with Policy E1 of RPG9 and Policy C2 of the draft South East Plan;
- Mitigation measures in relation to flood risk, air quality, noise and impacts on groundwater and rivers, archaeological remains and ancient woodlands and measures to protect and enhance the biodiversity assets of the site in accordance with Policies E1, E2, E7, INF1 and INF2 of RPG9 and Policies NRM1, NRM3, NRM4, NRM5, NRM7, NRM8 and BE7 of the draft South East Plan.

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## **South East England Development Agency (SEEDA)**

Dunsfold is a large site of 248ha based around a former wartime aerodrome.

SEEDA recognises that the local planning authority will need to determine the application in accordance with the Development Plan unless material considerations indicate otherwise. It is noted that there is no planning policy context for development at this site at either local or regional level. The SE Plan Panel report did not support the development because of its location and that it would be difficult to secure the level of self containment which would otherwise overcome the disadvantages of its location.

As a result SEEDA recognises that you may conclude that the application is not in accordance with the development plan.

That being said SEEDA welcomes the innovative transport, energy, waste and water initiatives in the scheme proposal. We also welcome the extensive references to the Regional Economic Strategy in the Planning Statement and recognise that in terms of a mixed-use development it does meet many of the RES sustainability objectives (Objective 3) based on

- Reducing CO2 emissions attributable to the South East by 20% from the 2003 baseline by 2016.
- Reducing per capita water consumption in the South East by 20%
- Achieving measurable improvements in the quality, biodiversity and accessibility of green space, open space and infrastructure and
- Enabling more people to benefit from sustainable prosperity across the region and reduce polarisation between communities

As a result the proposal has the potential to act as an exemplar for future sustainable development in a number of important ways. However SEEDA has concluded that these benefits do not provide sufficient grounds for the Agency to advocate making an exception to the Development Plan.

We also note that the existing uses on the site, which exist by virtue of a temporary permission, have recently been extended to 2018 (ref WA/2007/0372). SEEDA considers that employment uses on the site currently providing 638 jobs are consistent with the history of the site for employment uses dating back to its occupation by BAe and beyond when it provided in excess of 1350 jobs on the site. We therefore have no objection to the continued use of the site for employment purposes and of job growth up to a similar figure as previously.

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## **Surrey County Council Strategic Planning**

### Background

Dunsfold Aerodrome is a former military aerodrome of some 248 ha. Aviation use is still active at a reduced level and the site has permanent planning permission for a range of aviation-related uses. In addition, a range of commercial uses occur in existing airfield buildings under temporary permissions. The site is relatively isolated with Alfold village to the south and Dunsfold to the west. The main service centre for the local area is at Cranleigh, at some approx 7 kms. distance.

The current proposals are for some 2,601 dwelling units (including some 910 affordable units), based on a masterplan approach to the design and lay-out of a new community, with employment uses, community services, retailing, an Energy and Waste Centre, and extensive public domain proposals etc. The intention is to create a small market town as a form of mixed-use development creating a balanced and integrated community. An ambitious transportation package is also proposed. The applicants suggest that, although the proposals do not conform with the existing development plan, there are material considerations related to the need to allocate housing land to improve supply within the Borough that justify an exceptional case.

The proposals for a new settlement at Dunsfold Aerodrome have been subject to prior discussion and presentations. There is a comprehensive submission dealing with housing, design and economic matters, and a full Environmental Statement has been submitted dealing with environmental impacts. The application is in outline form regarding the lay-out and disposition of housing and other parts of the community development, whilst the employment activities, which relate to established uses, are a full submission.

### Saved Surrey Structure Plan

The County's strategic views are in relation to the saved Surrey Structure Plan, 2004, the Surrey Waste Plan, May 2008, and the emerging Surrey Minerals Plan. Regard is also given to the emerging South-East Plan. The paramount emphasis of the spatial strategy of the Structure Plan remains the achievement of sustainable development. Policies therefore seek to direct new development to existing urban areas in order to promote more sustainable patterns of development, the efficient use of urban land, and to protect the Green Belt and countryside. Schemes are to promote housing or mixed uses, or support the local economy, and provide necessary infrastructure. Town centre redevelopment schemes in particular are favoured. Access by a range of alternative modes of transport should be possible. All development schemes should exhibit high quality design, respect local character and respond to infrastructure and environmental requirements. Dunsfold Aerodrome is regarded as a general aviation airfield where, under saved Policy DN9, the County would support light aviation uses as the most suitable option provided a need was established and proposals were regarded as environmentally acceptable.

Policies of the Surrey Structure Plan are 'saved' as from 3 December 2007. Saved policies are referred to below. Some four policies are not saved.

### Draft South-East Plan

The Surrey Structure Plan remains as part of the development plan until replaced in due course by the regional strategy under the South-East Plan. The Plan will comprise cross-cutting policies also to provide for a spatial strategy. Its various component policies seek to deliver a

quantum of growth for the region, based on the achievement of more sustainable patterns of development. The draft Plan also provides for the protection of the Green Belt and environment. Waverley Borough is identified as lying outside those parts of the region where the Plan would encourage significant further redevelopment including further housing provision. Waverley is therefore identified as a mainly rural area heavily constrained by controls on development to protect environmental quality.

By way of confirmation, the Examination Panel Report for the draft Plan, August 2007, accepted that there is very limited potential for the Borough to contribute more than the recommended apportionment of housing growth in a sustainable manner. Nevertheless, the Panel recommended that the Borough accept a small revision upwards in its longer-term housing target figure (to some 250 dpa). Given the environmental constraints, the release of suitable high quality, higher density redevelopment for further housing mainly in urban areas is emphasised.

The Panel Report also refers specifically to the proposal for a new settlement at Dunsfold Park. The conclusions of the Panel in respect of a strategic-scale development of the type proposed clearly state that such proposals would “seriously unbalance the regional strategy and would be likely to remain unsustainable”. The case for a new settlement at Dunsfold is therefore clearly incompatible with the Panel’s recommendations for the spatial strategy for the South East region, and specifically that part of the ‘rest of Surrey sub-region’ incorporating Waverley.

The Secretary of State’s Proposed Modifications to the draft Plan are awaited. It is anticipated that some further consideration of the annual target housing provision for Districts will be included in the modifications. Nevertheless, in our view, it is not expected that the Secretary of State will seek to radically modify the Panel’s recommended approach to the draft Plan’s spatial strategy, and therefore we would expect to see some further confirmation of Waverley’s position.

#### Housing provision and an integrated community

The emerging Local Development Framework process for Waverley will provide an evidence base including a Strategic Land Availability Study, and Local Housing Needs studies, which will indicate numbers, densities and preferred locations for housing within the Borough in the shorter and longer term. The Borough’s Core Strategy will provide the basic spatial strategy for housing provision etc. based mainly on the characteristics of urban areas, and the disposition of need within the Borough. The Core Strategy is to demonstrate soundness in relation to national and local policy, and in particular, with the South-East Plan.

In our view, the proposals for a new settlement at Dunsfold Park, which do not support the role of established towns and provide for integration with existing transportation, and are for a relatively isolated rural location, do not conform with the locational and sustainability principles of the spatial strategy of the Structure Plan, or show compliance with the emerging South-East Plan.

Notwithstanding that the proposals include contributions to improve local accessibility, objection is therefore raised under the spatial strategy of the Structure Plan as given under saved Policies LO1 and LO2 concerning the proper location of development and the more efficient management of urban areas respectively. Objection is also raised as a consequence under saved Policy LO4 concerning the protection of the countryside, and saved Policy LO5 concerning the need for limited development within rural settlements to ensure meeting the local community’s social, economic and recreational needs.

Also, our view is that the submitted Housing Land Supply document, in revised form, seeks simply to assess the likelihood of providing for housing requirements for the Borough within a

five and ten year period in numerical terms. Whilst accepting that, in principle, the Dunsfold Park proposals may contribute substantially to housing provision overall, the study does not show how such provision is the most appropriate option for satisfying local needs. In particular, in our view, it is unlikely that a concentration of affordable units within this part of Waverley will be the most acceptable option for dealing with local needs assessments within the Borough's various towns. This matter is for the Borough to determine under the Local Development Framework process. Objection is therefore raised under saved Policy LO6 concerning general housing provision. Objection is also raised under saved Policies DN10 and DN11 concerning the most appropriate mix of dwellings and affordability.

The proposals also include a substantial increase in commercial uses on the site through a ten-year period of upgrading, expansion and diversification. Employment creation would also be stimulated through service and retail provision, and through the Energy and Waste Centre proposals. Whilst it can be expected some level of homes/jobs linkage can be created, it is our view that, over time, substantial commuting would be take place. Notwithstanding the proposals for local transportation improvements, many of these journeys can be expected to be by private car. It is also a general objective of the Structure Plan to focus employment growth and change in established centres to consolidate their role and provide for improved accessibility. Therefore, objection is also raised under saved Policy LO7 concerning the acceptability of increased economic activity on the site leading to employment growth that would run counter to the spatial strategy of the Structure Plan.

Some aviation use is to be retained in the form of helicopter use. On balance, the County would not object under saved Policy DN9 which seeks to maintain light aviation uses.

### Environmental issues

It is nevertheless also the County's view that, although proposals at Dunsfold Park are unacceptable under the current and emerging spatial strategy covering Waverley, and are not likely to provide an appropriate option for housing provision within the Borough's LDF process, the proposals have merit in terms of their environmental acceptability.

Matters concerning on-site pollution, both regarding site clearance and actual development, are capable of technical solutions as proposed. Hydrology and water resources have also been comprehensively assessed. Construction processes may have adverse impacts on the water environment, including potential pollution, but these impacts would be offset by an acceptable construction methodology, which includes a sustainable drainage system (SUDS). This aspect, in our view, is also likely to create a hierarchy of ecological valuable water features across the site. Overall, the development is also capable of complying with prevailing standards for the control of emissions to air, water and land. The proposals for dealing with land drainage and surface water attenuation, in the form of a SUDS, provided such measures are acceptable to the Environment Agency, are likely to comply with PPS25 (Development and Flood Risk).

On balance, provided the utility companies are satisfied that provision to improve basic services to the site can be accommodated within their service plans, the proposals would comply with saved Policy SE1 concerning pollution control. We refer to Waste Management matters again in more detail below.

Taken in isolation to other policy matters, the proposals would provide for a highly energy efficient development. Energy provision is to be provided by CHP for the entire scheme fuelled by biomass arising in neighbouring parts of West Sussex and Surrey. The aim is to have a built environment that is carbon-neutral. Nevertheless, although biomass-sourcing may promote woodland management, it is the case that this fuel source has to be secured in large enough quantities to make the concept of power self-sufficiency reliable. The system will use significant

amounts of biomass. Such industrial scale demands on cropping sources would have significant impact elsewhere, including on landscape character.

Nevertheless, the proposals would achieve above the minimum 10% requirement for on-site renewable energy required under policy. On balance, provided that subsequent levels of planning deal satisfactorily with the fuel sourcing and impact issues surrounding the Energy and Waste Centre, no objection is raised under saved Policy SE2 concerning energy matters

The proposals include a commitment to achieving Level 6 within of the Government's Code for Sustainable Homes. In terms of density and quality of design, the proposals therefore seek to achieve the requirements of Government policy for sustainable design and construction along with density and design standards under PPS3 (Housing). Whilst a query can be raised over costings, and possible changes to such a commitment over the timescale of development, no objection is raised under saved Policy SE4 concerning density and the quality of development.

### Heritage

The Cultural Heritage and Archaeology section of the Environmental Statement has taken previous discussions with the County's Archaeologist into account. Nevertheless, the overall outline nature of the future disposition of development suggests some different scenarios involving possible demolition of various structures. Overall, we would not demur from the conclusions of the Cultural Heritage chapter. We would also agree with the recommendations for further works, including the recommendation for a programme of evaluation trial trenching. We also agree that there will need to be an extensive programme of building recording and archaeological monitoring agreed prior to any permitted development commencing.

We are, nevertheless, less certain as to the protection of wartime features, or the proposed re-use of the existing properties on the site, e.g. Primemead Farm and Broadmeads Cottage (both of which should be refurbished). It is also the case that the proposals for a Museum on the site lack a great deal of clarity and substance, and will need to be significantly improved before they can be considered viable. It may be possible, for example, to convert or relocate one or more of the wartime structures on the site (such as the Blister Hangar) to house this facility. At this stage, it is not possible to be clear on preservation although the County's Archaeologist is satisfied that the submitted Aviation Survey has made a reasonable start to the process.

There is also the question of the potential impact of change on the Historic Landscape, which here includes the historic features within Dunsfold Park and the Wey and Arun Canal, and to a certain extent the remains of the wartime airfield. However, this should be balanced against the fact that the previous construction of the airfield involved the destruction of a landscape of fields, woodland and winding lanes, and although the proposed development cannot replace these, the inclusion of tree and hedgerow cover and a network of pedestrian links does in some ways re-establish these previous elements. In the case of loss of the airfield, any impacts will be mitigated by the creation of Runway Park that may either reflect the historic use, or reflect a previous hedgerow and woodland landscape.

Overall, there appears nothing arising from the Cultural Heritage and Archaeology assessment process that, in our view, precludes development on the site overall. Therefore, should it be decided to approve these outline proposals for lay-out etc. we would recommend that a condition, based on PPG16 (Archaeology), be added to ensure that the many remaining archaeological and cultural heritage concerns are addressed. Such a condition should state that no development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been approved by the Borough. As outlined in PPG16, it will be necessary to seek the funding for this work from the developers.

From such a further assessment and firm plans for the proposed layout of the settlement, it will be possible to make a proper determination as to the possibility of preservation in-situ for many of the structures described, the details of a Museum on the site, including consideration of actually housing it in one of the existing wartime structures, and a detailed standing buildings appraisal, which should also include structure-by-structure recommendations as to possible mitigation measures required should removal be proposed.

To accommodate these concerns, and therefore to comply satisfactorily with saved Policy SE5 concerning the protection of the heritage, an informative can be added to the recommended condition, that any further applications must be accompanied by the above-requested archaeological information, to ensure that a properly informed decision can be taken from the archaeological perspective.

Such matters can be discussed further with the County's Archaeologist (Tony Howe 01483 518783).

### Landscape and ecology

The Environmental Statement demonstrates the potential impact on the nearby AGLV, which, in this location, closely supports the Surrey Hills designation. The Surrey Hills AONB boundary is very close to the north boundary of the site. A number of SNCI sites are just within or immediately adjacent to the airfield, but, in our view, it is unlikely that the development as proposed will have direct impact on these areas.

However, the site can be seen from elevated land to the northeast at Hascombe Hill and northeast at Pitch Hill/Holmbury Hill. At present the site's core is dominated by runways and expanses of maintained grassland, together with associated building and structures, and as such does not contribute to the historic pattern of the wider landscape. Peripheral areas relate more specifically to the wider landscape, so the site is not wholly visually detached from its wider setting

The proposed scheme responds to this by seeking to minimise landscape and visual impacts, using extensive woodland and tree cover in particular. It is stated that the urban fabric, with its tree cover and open space network, will integrate the proposed scheme with the Wealden setting. We have some reservation over this statement, as it is inevitable that the longer views of the site will inevitably change and become views of a more urban character, albeit where there has been considerable attention to impact and the quality of views. On balance, nevertheless, the 'new' vista of a rural settlement may integrate more satisfactorily over time than the current use as an aerodrome and industrial site.

The principal landscape and visual impacts are likely to occur at construction phase. This includes impacts on local viewpoints due to site access construction and site activity. At operational stages there will be impacts as a result of the new access, lighting, and upgrading of local roads, although new planting will help to mitigate such impacts.

Overall, in our view, an integrated approach has been adopted, where the design of landscape has been considered integral to the provision of open space, recreation and access to nature conservation. Overall, the Landscape Strategy for Dunsfold Park has recognised the opportunity for landscape renewal and enhancement. The proposed Country Park is large scale and provides a reasonable basis for connecting the landscape of Dunsfold Park with the wider landscape of the weald.

There are mature trees on the boundaries of the site. As additional planting will significantly strengthen boundaries, the tree cover component will provide an important link element between the developed site and the wider landscape, whilst also providing a valuable screening



function. In our view, the key proposed elements of landscape provision are appropriate in the context of the site and its setting.

### Public realm

This proposals offer a significant amount of open space (145 ha), the overall greenspace being sub-divided into a number of linked landscape elements, each with distinct character. These include Benbow Country Park, Roundles Copse, Southlands Corridor, Eastlands Meadow, Furtherfits, Runway Park, and Farnhurst Meadows. A Landscape Management Plan is proposed to guide the management of open spaces for the first ten years. The overall aim is to apply sound management, amenity and biodiversity objectives. A longer timescale than ten years would be more appropriate.

The Masterplan includes provision for recreation to meet current standards. The design is based on 'Natural Play' and the maximisation of opportunities for play-value. The idea is to provide for play in informal spaces within 'green wedges', with provision being made to respond to different needs of different age groups and varying requirements. The proposed sport and recreation list seems well balanced, and the addition of allotments and a community orchard, whilst the aviation Museum highlights the site's past history, thus retaining an element of historic identity.

The provision of play space seems to have been covered adequately. Phasing of construction will allow the main open spaces east of the development core and Country Park to be available for use early in the programme, which is supportable.

No objection is raised under saved Policies SE8 and SE9 dealing with landscape and trees and woodlands respectively. No objection is also raised under saved Policy DN13 concerning the promotion of sport and recreation.

Access to nature is also considered, and, again in our view, well addressed through the enhancement and management of existing habitats and creation and management of new habitats. The concept recognises the opportunities to enhance nature conservation status across the site and enhance public awareness. Specific habitat management scenarios are set out clearly. There is a reasonable relationship between biodiversity protection and the landscape strategy. No objection is raised under saved Policy SE6 concerning the improvement of biodiversity and saved Policy SE7 concerning nature conservation.

### Educational and service provision

Prior discussion have taken place with the County's Schools Place Planning Group over the educational contributions as part of the scheme, in relation to the extent of both overall primary and secondary school financial contributions, including the need for adequate on-site provision. Discussions have centred on the need for a two-form entry, and possibly expanding to three-form entry primary level provision, plus Early Years provision on-site, plus a substantial contribution towards general secondary provision. There has still to be confirmation of acceptance as part of the development. The Schools Group current estimate of financial requirements is attached separately to this strategic response (further contact is advised with Mark Burton 0208-541 9142).

County Libraries requirements can be assessed according to the priorities for spending on additional resources required to meet the new development related to the local service points which are likely to require such facilities as a consequence. Such a requirement can be assessed under the Infrastructure Provision Code of Practice arising from the Surrey Collaboration Project.

Until satisfactory agreement has been reached on educational and libraries provision, objection is raised under saved Policy DN1 concerning infrastructure provision.

### Waste matters

We have assessed the proposals in terms of the County's responsibilities as Minerals and Waste Planning Authority. The Surrey Waste Plan, adopted in May 2008, seeks to provide for the sustainable management of Surrey's waste by driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal to land as the last option. Furthermore, where practical and affordable, all communities are encouraged to take responsibility for their own waste through reducing the amount produced and increasing recycling. Wherever possible, waste should be managed on the site of its production.

The applicant proposes to develop both a waste treatment plant and a 3.5 Mw. capacity CHP plant on the site fuelled by 60,000 tonnes of locally sourced woodchip. The waste treatment plant will enable the treatment on site of residual domestic waste, after sorting of recyclables by households for collection and distribution off-site, to reduce the volume going to landfill. The technology will involve autoclaves (heat and pressure treatment) and materials separation enabling the residual waste to be converted into a fibre product suitable for recycling or recovery for bio-ethanol, recyclables and residual fractions for disposal.

The applicant recognises that the Borough Council are the Waste Collection Authority responsible for collecting domestic waste, and that the County Council are the Waste Disposal Authority responsible for disposal. At present, the applicant has no claim over the residual domestic waste that they propose to treat on site. The proposal for treating residual domestic waste on site is therefore entirely dependent on the applicant entering into negotiations and coming to a satisfactory agreement with both authorities and their contractors. However, there is no objection under policies of the Surrey Waste Plan to commercial and industrial waste arisings on site being collected and treated on site through the autoclave process.

The autoclave process is considered innovative and progressive although the technology is yet to be proven. It would therefore be of interest to trial this concept at the site and to see whether or not it proves effective and financially viable in practice. However, our main concern is whether or not there is an established market for the final product.

The CHP plant will encourage wood waste recycling by burning woodchip to provide district heat to the proposed homes and commercial premises with any surplus being sold to the national grid. We accept this concept, although there is some doubt whether this process will actually work in practice. It is noted that the applicant is confident that this will create a new market for forestry and woodland produce despite much of the woodland being uneconomic to operate at present. However, it must be recognised that the plant will require a significant and reliably sourced quantity of wood waste. It may still prove very difficult in practice to maintain a sufficient supply despite the increased viability of woodland management that will be created. There are also a number of potential biomass heating schemes within the County and surrounding areas that would inevitably compete for fuel sources.

Nevertheless, notwithstanding the outstanding issues set out above, which would need to be resolved, these facilities would help to deliver sustainability by driving waste management up the waste hierarchy, addressing waste as a resource, and looking to disposal to landfill as a last option. Therefore, this approach could potentially be in accordance with the strategic objectives contained in the Surrey Waste Plan.

### Proposed Waste Management Plan

The submitted Waste Management Plan refers to textiles, glass and dense plastics being part of a separate collection service. This will require dedicated space to be provided in new development to store separate waste collection containers for recyclable materials. In order to comply with the requirements of Policy W2 of RPG9 (Waste and Minerals), June 2006, the applicant will need to address these design issues in the Waste Management Plan for all new buildings on the site.

The applicant states that some existing buildings will need to be demolished together with three runways and some hardstanding. This will provide a very significant opportunity to re-use construction, demolition and excavation waste on site through the production of recycled aggregate. The use of sustainable construction techniques will help to reduce the need to use primary land-won aggregate.

The applicant explains that construction will also be subject to a site waste management plan to be submitted with the detail of the first phase of the development. This will cover the amount and type of material produced from excavation and demolition, the opportunities for re-use and recovery of materials and methods for any off-site disposal, including the mitigation of impacts. Provided that opportunities for recycling are maximised in the site waste management plan, and that any surplus material is sent off-site to aggregate recycling sites wherever possible rather than to landfill, this approach will comply with the requirements of Policy CW1 of the Surrey Waste Plan and Objective 1 and Policies MC1 and MC2 of the emerging Surrey Minerals Plan.

The local Cranleigh Sewage Treatment Works (STW) does not currently have sufficient capacity to receive the additional foul water that would be created within the whole developed site. The application has been submitted on the assumption that the Cranleigh STW will be upgraded by Thames Water subject to an appropriate developer contribution. This approach would be consistent with Policy WD6 of the Surrey Waste Plan which seeks to grant planning permission for extensions to existing sewage treatment works where development is needed to treat Surrey's arisings, or in the case of arisings from elsewhere the need cannot practicably and reasonably be met at another site.

The applicant also seeks to provide a number of landscaped areas including a country park, copse, fields and meadows. It is assumed that the creation of landscape, biodiversity and recreational areas will not require the importation of waste onto the site as this has not been referred to in the submission. However, if the applicant does intend to import waste material in order to revise existing contours or improve drainage for example, then further details would need to be submitted in order to justify any need for waste importation in order to meet the requirements of Policies WD7 and WD8 of the Surrey Waste Plan.

### Transportation

The Transport Assessment and Travel Plan arrangements have been assessed by the County's Transportation DC Group. There remain matters of further discussion, submission and agreement.

Currently, notwithstanding the Transport Strategy submitted to reduce dependence on the motor car, the County's view is that the proposed development would be heavily dependant on travel by private car, contrary to Government policy and saved Policy LO1 concerning accessibility. It has also not been adequately demonstrated that proposed improvements to transport infrastructure in the vicinity of the development are appropriate to serve a development of the scale and nature proposed, contrary to saved Policies DN1 and DN2 concerning highway infrastructure and the movement implications of development respectively.

## Conclusions

The proposals for a new settlement at Dunsfold Park fail to comply with the spatial strategy of the saved Surrey Structure Plan, 2004, which requires proposals for sustainable development to be properly located primarily as part of the management of change and the regeneration of urban areas. Proposals are also to be located so as to contribute to satisfying identified local housing needs for existing communities in an appropriate way thus ensuring such communities also benefit from affordable housing, improved services and transport provision.

Objection is therefore raised under the spatial strategy of the Surrey Structure Plan, as given under saved Policies LO1 and LO2 concerning the proper location of development and the more efficient management of urban areas respectively. Objection is also raised as a consequence under saved Policy LO4 concerning the protection of the countryside, and saved Policy LO5 concerning the need for limited development within rural settlements to ensure meeting the local community's social, economic and recreational needs. Objection is also raised under saved Policy LO7 concerning the acceptability of increased economic activity on the site leading to employment growth and commuting that would run counter to the spatial strategy of the Structure Plan.

In our view, it is also unlikely that a concentration of affordable housing units within this part of Waverley will be the most acceptable option for dealing with local needs assessments within the Borough. This matter is for the Borough to determine under the Local Development Framework process. Objection is therefore also raised under saved Policy LO6 concerning general housing provision, and under saved Policies DN10 and DN11 concerning the most appropriate mix of dwellings and affordability.

Neither would the proposals comply with the emerging regional strategy under the South-East Plan. The Examination Panel specifically found against by a new settlement at Dunsfold Aerodrome. The Secretary of State's Proposed Modifications to the draft Plan are awaited. The County would not anticipate a radical modification to the spatial strategy of the draft Plan so as to accommodate proposals for a new settlement in Waverley.

In our view, circumstances affecting the Borough, including local housing needs, are not likely to make it critical that housing provision on the scale proposed at Dunsfold Park should be considered as a preferred option within the Borough's Local Development Framework process. It is likely that the Borough would need to pursue more appropriate options, as a consequence of the assessment of urban areas and existing infrastructure capacity and needs, so as to comply more closely with the emerging South-East Plan requirements.

It is also the County's view at the current time that the proposed development would be heavily dependant on travel by private car. Notwithstanding the submitted Transport Strategy, the County's view is that the proposed development would therefore be contrary to Government policy and saved Policy LO1 concerning accessibility. It has also not been adequately demonstrated that proposed improvements to transport infrastructure in the vicinity of the site are appropriate to serve a development of the scale and nature proposed, contrary to saved Policies DN1 and DN2 concerning highway infrastructure and the movement implications of development respectively.

The proposals also are not likely to succeed in bringing forward other necessary infrastructure to underpin the Structure Plan and emerging South-East Plan to ensure proper spatial planning within Waverley. In particular, a solution will need to be reached on educational provision. Satisfactory agreement would therefore be required concerning educational and libraries provision, to obviate objection under Policy DN1 concerning general infrastructure provision.

We would recommend that a condition, based on PPG16 (Archaeology), be added to ensure that the many remaining archaeological and cultural heritage concerns are addressed, so as to comply satisfactorily with saved Policy SE5 concerning the protection of the heritage.

Nevertheless, taken in isolation from spatial and regional planning policies affecting the County, and subject to our comments above, the proposals seek to satisfy the requirements of Government and local policy regarding the need to promote environmental sustainability to a significant degree. On balance, the proposals potentially can also comply with the policies of the County's Waste Plan concerning the proper treatment of waste. Further details would need to be submitted in order to justify any need for waste importation in order to meet the requirements of Policies WD7 and WD8 of the Surrey Waste Plan.

Should the Borough Council be minded to permit the proposals as an exceptional case on the basis of the environmental benefits of development, departure procedures would need to be a consideration.

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## **Surrey County Council Highways and Transportation**

Recommend that the proposal be refused for the following reasons:

- 1) The proposed development of 2,601 homes, extension of the existing employment uses and creation of other uses in this very rural location would be heavily reliant on travel by the private car contrary to Central Government Policy expressed in PPS1, PPS3 and PPG13, and Development Plan Policy LO1 of Surrey Structure Plan 2004, Policy M1 of 2002 Waverley Local Plan.
- 2) It has not been adequately demonstrated that the limited proposed improvements to transport infrastructure in the vicinity of the development are appropriate to serve a development of this scale and nature, nor that further improvements could be implemented that would mitigate the adverse impacts of a substantial increase in travel demand in this very rural location.

In the event that the deciding authority considers there are other planning interests of acknowledged importance that outweigh the above fundamental objections, and that Planning Permission should be granted, a package of transportation mitigation measures that might partially lessen the travel impact of the development should be imposed as a pre-requisite. This should be delivered through an appropriate legal agreement that includes Surrey County Council as signatory.

### Note to Head of Planning:

The complexities of the proposals and required response timescales have not allowed a fully worked up "fall back" mitigation package to be agreed prior to considering the application at Planning Committee. The County Council are currently working with the developer to try to minimise harm lest planning permission is granted, by securing a mixed package of improvements to the wider travel network, travel strategy and management plan (to include parking/travel planning), and a mechanism to try and ensure funding, continuity and enforcement. It is a requirement of the Planning Inspectorate that such Legal Agreements and recommended list of conditions are agreed prior to the termination of any subsequent Public Inquiry, so the County Council will be working within this timetable in the likely event of an appeal. The County Council engage in this activity on the understanding that it is entirely without prejudice to the above recommendation for refusal.

Within the Timescales permitted by your consideration of the above application, the County Council have undertaken an assessment of the Travel Strategy and Transport Assessment submitted in support of the application. It has become apparent through that process that the development as proposed cannot demonstrate a compatibility with location and infrastructure policy, and that it is also very unlikely to be capable of so doing, primarily due to its setting within a deeply rural part of the Borough. The “headline” issues that have come out of this process to date are as follows:

- Few of the forecast reductions in travel demand arising from the Transport Strategy have been based upon evidence from other like developments.
- No comparative assessment of the increased kilometres generated by a development in this location as opposed to more sustainable sites has been undertaken.
- The application proposals include no demonstration that the development industry/house purchasers will be prepared to buy into an environment where charges are made for parking/ driving off site.
- There is no demonstration that the continuation of the relatively unknown elements such as Cordon Charging / cross subsidisation of bus services can be sustained throughout the life of the development, without legal challenge or a breach of those obligations by a very large number of subsequent title owners.
- The modelling work is dependent upon too many assumptions that could result in a considerably more favourable scenario than would be the case if some or all the assumptions failed to succeed.
- Even with the very favourable assumptions made, considerably more junctions are in need of improvement according to the Transport Assessment, than are being proposed. Only five junctions are being altered in any way, with one of these appearing to exhibit ample spare capacity and no safety problems. It seems that only those junctions where improvements would be easily achieved have been considered, despite the findings of the applicant’s own studies. None of the links have been proposed for improvement. The A281 and B2130 are identified by the developer as being problematic even without the traffic associated with the development.
- Inappropriate assignments have been made on the network, especially in respect of too few development movements being assigned on the B2130 (Brighton Road through Loxhill/Hascombe/Busbridge).
- The assessment has not included the significant increases in traffic on the A281 from/ to the south associated with the proposed 2,500 residential units to the west of Horsham.

The above bullet points are only some of the concerns that the County have in respect of the application proposals. A fuller note has been produced which will form the basis upon which discussions will be commenced with the developer’s agents in an attempt at agreeing a fall back mitigation package.

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## **Waverley Borough Council Planning Policy**

The following comments on planning policy focus on the strategic issues and not detailed policy considerations.

This is a very significant development, which is of more than local significance. As it stands, a development of this size/type is not promoted either through regional planning policy, the County Structure Plan or the Local Plan. In fact a useful starting point is the section in the report from the South East Plan EiP Panel, published last August. It states:-

*“...in our view the proposal for about 2,500 dwellings and 2,000 jobs at Dunsfold Park would seriously unbalance the regional strategy and would be likely to remain*

*unsustainable. The area is relatively remote from service centres, public transport accessibility and the local road network would not be capable of being improved to an appropriate level, and it would be difficult to secure the level of self-containment that might overcome these disadvantages. Accordingly, we would not recommend the scale of development proposed at this location.” (Paragraph 26.86)*

These comments are recommendations from the Panel. We are still awaiting the publication of the Secretary of State’s proposed changes to the South East Plan, which are expected this summer.

I do not propose to comment on other relevant SEP policies or saved Structure Plan policies, as the respective consultation responses from SEERA and Surrey County Council should deal with these.

Waverley Borough Local Plan (Saved Policies)

#### Countryside Policy C2

In terms of local plan designations, the site is within the Countryside and subject to policy C2. It is also close to some designated SNCIs.

Policy C2 states that outside settlements the countryside will be protected for its own sake. It also states that building in open countryside away from existing settlements will be strictly controlled. Having regard to this, and the absence of any strategic designation or identification of this site for this type of development, the policy conflict is very clear.

The conflict with Policy C2 will no doubt be in line with similar strategic policy objections in relation to SEP and SSP policies.

#### Location of Development (Policy M1)

There are also the locational considerations. I am referring specifically to Local Plan policy M1. This promotes developments that are major trip generators in the main settlements, which are relatively speaking the most accessible by public transport, walking and cycling. Clearly this mixed-use proposal is intended to provide a settlement with a core of necessary services/facilities. However, these will not cover all needs and the relatively remote location of the site is clearly another factor affecting the principle of development, as identified by the SEP EiP Panel. I would expect Surrey CC to comment on sustainability/accessibility issues in its transportation response.

#### Housing Supply

The current adopted housing requirement is in the SSP 2004. This required an average of 187 dwellings a year for the period 2001 – 2016. Past completion rates have exceeded this, such that currently only 121 dwellings per year are required to meet this housing requirement. The average annual completions in the period 2001 – 2008 were 263 dwellings. The SSP requirement will in due course be replaced by the SEP. Currently the requirement for Waverley is likely to be 250 per annum (as recommended by the SEP EiP Panel). We will know more when the Government publishes its proposed changes to the SEP this summer. Assuming that 250 is the figure, we will need to establish whether we have a five–year supply of deliverable land, as required by PPS3. Initial indications are that we will, but we are still working on this. We also have consultants (Baker Associates) carrying out a Strategic Housing Land Availability Assessment (SHLAA) to provide evidence to support our emerging LDF. What is clear is that there is no shortfall in housing delivery to the extent that it must be addressed by a development of this scale, which represents over 50% of the anticipated SEP requirement for the period 2006-2026.

### Existing Uses

Clearly the current uses and the status of the various planning approvals on the site are material considerations. This is a significant site and it contains a large amount of floorspace. However, this, in itself is not sufficient justification to support what is otherwise a very significant development in a rural location, where no regional/local need has been identified for the development.

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### **Waverley Borough Council Housing** (revised comments following meeting on 8 July awaited)

#### Proposed level of affordable housing

1. The application is to develop 2,601 homes, of which 910 are proposed as 'affordable'. This equates to 35% of the total units, as opposed to 37.8% quoted throughout the application, which is created by removing 196 units of Extra Care, Warden Assisted and Student Accommodation from the grand total. An assumption has been made that all extra care, warden assisted and student accommodation falls into C2 use category, upon which no requirement for affordable housing would be made. *However, I have not seen the basis upon which these assumptions have been made and I would be interested to hear the views of my colleagues in our Planning Policy team on this issue.*
2. The requirement for affordable housing on proposals to develop housing for older people is in line with current Governmental guidance (contained in correspondence to all Local Authority Chief Executives, received March 2006) whereby "The Government sees no distinction between proposals for open market sheltered accommodation and any other open market housing in terms of assessing such schemes against affordable housing policies in the development plan...the Government therefore does not regard that development proposals for sheltered or extra care housing to be sold or let on the open market should be exempt from the need to provide an element of affordable housing."
3. Under current policy for subsidised affordable housing within settlements (H5 of the Local Plan), a density below 40 dwellings per hectare would trigger a 30% requirement for affordable housing, which has been exceeded in these proposals. However, it should be borne in mind that the Surrey Structure Plan requires LDF's to seek 40% affordable housing, which was echoed in a recommendation contained in a 2005 update to the Housing Needs Survey and a current draft of the West Surrey Strategic Housing Market Assessment. As part of the development of the LDF affordable housing requirements are being revisited and one of the issues to be considered in the LDF is whether the affordable housing requirement in Waverley should be increased to 40% to bring them more in line with the Surrey Structure Plan and Housing Needs Survey recommendations.

#### Housing need in Alfold and Dunsfold and the surrounding area

4. Waverley is an area of high house prices, with first time buyer accommodation and affordable housing in very short supply. There is a high level of housing need for affordable housing for Waverley as a whole. An update to the Housing Needs Survey (2005) estimated a shortfall of 622 affordable units every year. As of 12<sup>th</sup> May 2008, there are 2,987 households registered on the Council's Housing Needs Register. Of these, 437 have indicated Alfold to be one of their preferred areas for rehousing and 485 have indicated Dunsfold to be one of their preferred areas for rehousing (see Tables One and Two).
- 5.

<b>ALFOLD</b>	<b>1- bed units</b>	<b>2- bed units</b>	<b>3- bed units</b>	<b>TOTAL</b>
COUPLE	52	1	0	<b>53</b>
DISABLED	2	1	0	<b>3</b>
ELDERLY COUPLE	5	2	0	<b>7</b>
ELDERLY SINGLE	13	0	0	<b>13</b>
EXPECTANT MOTHER	0	0	0	<b>0</b>



FAMILY	3	67	42	<b>112</b>
OVER 50	34	2	0	<b>36</b>
SINGLE PARENT FAMILY	1	38	17	<b>56</b>
SINGLE PERSON	155	0	0	<b>155</b>
SPLIT FAMILY	0	2	0	<b>2</b>
<b>TOTAL</b>	<b>265</b>	<b>113</b>	<b>59</b>	<b>437</b>

**Table 1; Households on the Housing Needs Register who included Alfold as one of their preferred areas for rehousing**

<b>DUNSFOLD</b>	<b>1- bed units</b>	<b>2- bed units</b>	<b>3-bed units</b>	<b>TOTAL</b>
COUPLE	61	1	0	<b>62</b>
DISABLED	3	1	1	<b>5</b>
ELDERLY COUPLE	7	2	0	<b>9</b>
ELDERLY SINGLE	15	0	0	<b>15</b>
EXPECTANT MOTHER	0	0	0	<b>0</b>
FAMILY	5	71	40	<b>116</b>
OVER 50	39	2	0	<b>41</b>
SINGLE PARENT FAMILY	1	39	20	<b>60</b>
SINGLE PERSON	174	0	0	<b>174</b>
SPLIT FAMILY	0	3	0	<b>3</b>
<b>TOTAL</b>	<b>305</b>	<b>119</b>	<b>61</b>	<b>485</b>

**Table 2; Households on the Housing Needs Register who included Dunsfold as one of their preferred areas for rehousing**

6. Although the figure for 1 bedroom accommodation is relatively high, there is a need for caution about it. The Council's allocation policy determines bedroom size requirements on the basis of current need, which permits, expectant couples and couples with children under 6 months to only register for 1 bed roomed accommodation. With this policy it is clear that a number of people re-housed in one bedroom accommodation will require larger accommodation in time. Closer analysis of this data shows that a significant proportion of the applicants are elderly and specifically interested in being re-housed in designated elderly accommodation and in particular locations usually near relatives. It is also worth noting that a significant proportion of applicants for a one bedroom home, who are in priority need, may require some form of support services or assistance to maintain their independence. In addition, anecdotal evidence suggests that the limited number of households registered for larger properties may be as a result of the lack of larger homes in Council owned and Registered Social Landlord affordable housing stock in the borough. Therefore, many households may be choose instead to register for a smaller home which has the potential to be expanded or adapted to accommodate more bedrooms. Most households looking to buy a home through shared ownership are registered for smaller properties as most Newbuild Homebuy properties are one and two bedrooms and larger properties are frequently less affordable.
7. However, with development on such a scale, it is also important to take into account housing need expressed in Hascombe, and Rowly and from the surrounding Local Authorities of Mole Valley, Horsham, Chichester and Guildford.
8. *Throughout the application, references are made to the Local Market Area. I would like clarification as to whether this covers the entire Local Authority areas of Waverley, Guildford, Mole Valley, Chichester, Horsham, East Hampshire or just a section of this. For example, the Saville's report highlights a need for 282 shared ownership home in the Local Market Area per annum (p.223), which contrasts to the 161 intermediate home (which*

encompasses shared ownership and intermediate rents) highlighted in the draft Housing Market Assessment area of Guildford, Waverley and Woking.

Local supply of affordable housing

9. The supply of council owned affordable housing in Cranleigh and Alfold/Dunsfold is insufficient to meet local need. As at 1.4.08, 29 homes were owned by the Council in Alfold and 46 homes were owned by the Council in Dunsfold. Of course, these comes are occupied by tenants and it is only when a vacancy arises that we can offer it to someone on the Housing Needs Register, as illustrated in Table Three over the page.

YEAR	1-bed units		2-bed units		3-bed units	
	Alfold	Dunsfold	Alfold	Dunsfold	Alfold	Dunsfold
2007/08	0	0	0	0	0	0
2006/07	0	0	1	0	0	0
2005/06	1	0	0	0	0	0
2004/05	0	1	1	0	1	1

**Table 3; Lettings of Council owned general needs homes in Alfold and Dunsfold (excludes sheltered housing and home designated for older people)**

Development, ownership and management of proposed affordable homes

10. Waverley Borough Council is keen to ensure that the affordable housing provision on new sites has the same appearance as the market housing in terms of details, build quality, materials etc. Even though it is proposed that the affordable housing will be privately funded with no call on public funds, we would still expect any affordable housing to be built to meet the relevant Housing Corporation Standards. The latest standards can be downloaded from the Corporation’s website and the Housing Corporations regional offices can provide further clarification. An element of meeting this requirement is for the following minimum internal floor areas.

Number of bed spaces	Minimum internal floor area
Two	45m2
Three	57m2
Four	67m2
Five	82m2 (2 storeys)
Six	95m2 (2 storeys)
Seven	108m2 (with 2+ storeys)

**Table 4; Minimum Internal Floor Areas**

11. *Although it has been suggested that any affordable homes are ‘to be dispersed in several clusters throughout the development’ I have yet to see any plans which illustrate how this has been put into practice.*

12. *I would like further information as to expected timescales for delivery and how the proposed development would be phased.*

Eligibility and priority for affordable homes

13. It is proposed that all the affordable housing will be privately owned and funded but to be managed by a Housing Association. The applicant is not a Registered Social Landlord but it is planned for a Trust to be established, though few details have been provided. It has been the Council’s normal practice to expect to see a Registered Social Landlord as the freehold owner of affordable sites on exception to planning policy sites as these are regulated by the

Housing Corporation, which has statutory powers. Registered Social Landlords will be able to advise on meeting the relevant Housing Corporation standards, design, funding issues and subsequent management of the affordable housing. Full contact details for Registered Social Landlords developing affordable housing in Waverley are available on our website at <http://www.waverley.gov.uk/housingstrategy/associations.asp>

14. *I would like to ask whether the developer has already entered into agreement with a local Registered Social Landlord or if discussions are still underway.*
15. A cascade mechanism has been proposed, which outlines who will be given priority for any affordable home. Precedence will be given to those employed or applying for employment at Dunsfold Park, then to those employed or applying for employment in the wider Cranfold area with the intention to 'underpin the sustainable live-work patterns that the scheme is founded on.' *Therefore, I would like to question who will hold this list, how will it be managed and monitored and who will have final accountability for this list. Priority is given to people working in the local area but I cannot see any restrictions as to income levels or priority for households on lower incomes or what would happen in the event of a household leaving employment in the local area.* Households held on Waverley's Housing Needs Register would be eligible after locally employed households. However, housing legislation means that anyone can go onto a Housing Needs Register, regardless of their housing needs or whether they have a local connection and so this group would also encompass 'persons from outside the Borough on the Choice Based lettings'. Waverley also operates Homeselecta (a cross borough Choice Based Lettings scheme), in partnership with the Local Authorities of Guildford, Hart and Rushmoor. This is different to the Local Authority areas of Guildford, Mole Valley, Chichester, Horsham, East Hampshire which adjoin this scheme. Waverley's allocation scheme gives a priority banding according to medical, social, financial circumstances and how long a household have been waiting for housing. However, no details as to how priority will be allocated within each cascade has been supplied. Additionally, giving highest priority to locally employed people leaves in unclear as to how much of the need from the Council's Housing Needs Register (illustrated in Tables One and Two) will be absorbed by this scheme. No provision has been made to allow cross borough nominations from the surrounding authority areas (see paragraph seven) via the cascade mechanism, even though the supporting documents portray this as a sub-regional scheme.
16. It has been the Council's practice only to make 'exception to planning policy' on housing sites, which are clearly meeting a local need for affordable housing i.e. within the Parish/ Town/ or the immediate settlements. Therefore, I would suggest it may be more appropriate to give highest priority to households on the Council's Housing Needs Register who have a local connection to the Cranleigh/ Dunsfold area.
17. An assertion is made that all 'Social Rented units will be let at Housing Corporation Target rents ...with Rent increases...restricted to that allowed by the Housing Corporation in its annual review'. I would be supportive of this approach, in order to ensure those units remain 'affordable'.

#### Temporary accommodation

18. The principal of including 35 units of accommodation for homeless people is supported as this could from a useful from a prevention of homelessness perspective for Waverley if units could be let on Assured Shorthold Tenancies, with a view to moving on to permanent accommodation via the Housing Register.

### Extra Care and Warden Assisted Units

19. *Upon consultation, the South West Surrey Extra Care Housing Strategy Group (which consists of professionals from Local Authorities, County Council and Primary Care Trust) would like make the following comments:*

- A total of 120 'warden -assisted' flats is considered excessive and the group would question demand. From a Surrey 'Supporting People' perspective, there is already an over-supply of warden assisted units in Waverley. The rural nature and remoteness of the site raises concerns over access to services, particularly social and health care. I am unclear as to what kind of support and tenure the 120 'warden assisted units' would consist of. Generally, services are increasingly moving towards floating support services as opposed to accommodation based.
- The provision of an Extra Care facility would in principle, be supported by the group. The proposed Scheme would need to meet the criteria for Extra Care in both building and service terms.
- Viability assessments on the development of Extra Care scheme would suggest that 30 units is not large enough to be viable and anything from 40 to 60 beds would be required. *From a County point of view, the choice would be to increase the Extra Care provision, but reduce the warden-assisted element, perhaps with a mixed tenure Extra Care scheme, that meets the County's minimum specification requirements for Extra Care Housing.*
- Although there is no mention of tenure the group would consider leasehold to be the only option for an Extra Care facility.
- Notwithstanding, the developers claims that the overall Scheme would form a self contained community, there are concerns that the infrastructure would not support the needs of persons occupying Extra Care or 'warden -assisted accommodation.

### Student Accommodation

20. All 46 units of student accommodation are proposed as bed-sit accommodation, which presumably would not suit young couples or families with children. *I would suggest seeking views from local further education establishments as to whether this proposed provision would meet housing need from students and request clarification as to which educational establishments this accommodation would be set up to serve.*

### Conclusion

21. Although this scheme aims to meet a very particular need through a particular model of providing 'affordable homes' this scheme as contained in the planning application cannot at this stage be supported by the Housing Department as it:

- Is not currently sponsored by an RSL
- Does not prioritise local housing from the Housing Needs Register
- Poses more questions than it answers

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## **Waverley Borough Council Environmental Health**

I've studied the submitted EIA (Volume 3c Environmental Statement, non-technical summary, April 2008) for items of relevance to environmental health, particularly with regard to potential noise, air quality and contaminated land issues.

Whilst it appears there are many potential Positive Impacts from the development as submitted (as summarised in their document, pages36) they do not seem to be of Environmental Health significance; the exception being the re-routing of HGV traffic once the development is operating (para 150).

However, many of the potential Negative Impacts and all of the potential Negative Cumulative Impacts (summarised on pages 38 and 39 of their document) are of Environmental Health

significance. These are both during the construction phases and/or once the development is completed.

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## **Waverley Borough Council Leisure Services**

Comments chased

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### **Waverley Borough Council Arboriculture Officer**

The size of the scheme limits observations at this stage to broader issues of landscape impact as opposed to detailed implications assessment. The environmental impact report appears to be a fair assessment of existing landscape features of note and makes a reasonable assessment of levels of impact in each respect.

The sylvan screening around the majority of the site to local views means that the visual impact will principally be limited to views from the surrounding hillsides. This would be an inevitable negative impact of any new settlement in the Borough at such a relatively low level (Low Weald).

The issues of impact on the existing trees/woodland can, with appropriate protective measures, (in my view, without sight of consultation responses from other interested agencies) principally be restricted to the alterations to existing and creation of a new access point. Presumably the retained access ways would require upgrading.

In the overall scheme of creating a new settlement the extent of tree/hedgerow loss associated with these works would appear relatively low in terms of landscape impact. The proposal can be feasibly undertaken without having a significant detrimental impact on the principal landscape features and habitats of the local area.

Proposed new landscape planting could enhance and mitigate the loss in this respect and combined with proposed implementation of management plans for significant woodlands that are currently neglected, potentially would have a positive long term effect.

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## **Commission for Architecture and the Built Environment (CABE)**

We encourage the bold vision behind this proposal for an exemplary new sustainable settlement. However, we think it will be challenging to make a convincing case for a new settlement of this scale in this location. It is unfortunate that the local authority has yet to adopt an Area Action Plan to establish an agreed vision for the site to assist in discussions with the landowner and key stakeholders. We are disappointed that the proposed masterplan fails to demonstrate a strong conviction about how Dunsfold Park should be planned to reflect the site's heritage and its physical context to match the client's visionary approach to sustainable energy and waste management. We urge the design team to put forward a plan that reflects a 21st century model for sustainable living, instead of a conservative image of pre-war housing. A more successful plan could emerge from revisiting the building typology of vernacular revival buildings currently envisaged for the site, which we feel is at odds with the vision for this place as a green 'village of the future'.

Further, we are not convinced that sufficient provision has been made for future expansion. Phasing and procurement will also be critical in determining the success of this new settlement.

In light of the above concerns, we think planning permission should be refused for this proposal in its current form.

#### *Securing a sustainable location*

The location of this new settlement is particularly challenging due to the scale of development proposed. This site sits in a rural location, and is currently poorly served by public transport; we think this constitutes a difficult starting point to make a case for a new 2,600 home community in this locality. The planned employment growth on site will not, in our view, overcome the significant out-commuting from this settlement, with its associated impact on local infrastructure. Therefore, the local planning authority will need to assure itself that this site can, above all other considerations, be deemed a sustainable location for this major new settlement. A convincing case will need to be made about the role Dunsfold Park will play in the sub-regional context to justify the level of growth planned for the site.

#### *Developing a visionary approach to masterplanning*

Notwithstanding the predicament of justifying this scale of development in this location, we think the proposed masterplan fails either to present a logical response to the site, or to articulate the true nature of the place being created. To our mind, there are three underlying reasons for these failings.

Firstly, whilst we fully support the notion of preserving the memory of the site's historic uses, such as the main runway, to give character and meaning to this new settlement, there is an unresolved tension between the formality of the crescent and the informal residential neighbourhoods beyond. For example, we are not convinced that the current solution of a Runway Park is conducive to creating a fully integrated urban settlement, not least because it inhibits the crossover of employment uses southwards, suggesting a zoned approach to masterplanning. The resulting plan has more in common with the pre-war, London County Council housing, than a bespoke settlement for a new type of community reflecting sustainable lifestyles in the 21st Century. A more convincing urban structure is required that moves away from the hybrid scheme proposed towards a plan that more successfully exploits the potential of the site's existing character and future possibilities.

Secondly, whilst community engagement is a critical element in the masterplanning process, it should help inform but not dictate the final design. It is for the design team to discern the level of weight such consultation should have in relation to other influences such as site analysis and the project's overall ambitions and goals. We feel that, in this case, the proposals lack the conviction and self-assuredness that one would expect to see from a truly visionary sustainable settlement. The proposals could risk alienating the forward-thinking communities it is trying to attract.

Thirdly, we acknowledge that the design team is at an early stage in its consideration of building types for Dunsfold Park. However, we do not believe that the imagery presented represents the best starting point for establishing a visionary approach to town building that has relevance to 21st century living. Whilst we think there is scope to take inspiration from the core principles of the Arts and Crafts movement relating to urban layout and quality of construction, the designs presented appear filtered through 19th and 20th Century suburbia, which was more concerned with the imagery of this movement than its principles. The risk of adopting this approach is that it creates an anonymous suburbia and perpetuates a mono-culture that fails to distinguish one residential neighbourhood from another. To overcome this, we strongly suggest that a typology is adopted that speaks more of an architecture of our time, yet embodies the core principles of good urban planning, mixed-use neighbourhoods, and high quality construction. This should help to resolve the current difficulties relating to site planning and help to define stronger character areas than currently proposed.

#### *Procurement*

We are heartened by the desire not to parcel the site up for volume house builders, which would significantly undermine the intention to create a unique and attractive new urban settlement. However, the single land ownership of the site has its own challenges in securing a viable and varied settlement in the long term. The method of procurement will make or break this development and we urge the local authority to satisfy itself that this process will secure a high quality development in the long term.

#### *Long-life, loose-fit*

The design team should anticipate how Dunsfold Park might develop when it has reached full capacity in fifteen to twenty years time. There is no indication of where the unwritten boundaries of this settlement might be found, or whether the development might be capable of growing from within by increasing housing densities. Unless these are defined now, there is the risk that this development will suffer from the 'arterial sclerosis' that has proven the undoing of its precursors such as Letchworth. There should be a clear idea of how the development fits with the longer term goals of the local authority and its development plan.

#### *Conclusion*

The scheme presented feels like the early phases of a big vision. We do not underestimate the challenge faced in addressing the shortage of affordable housing and diminishing social infrastructure in this rural area. However, advocating Dunsfold Park as part of the solution risks undermining efforts to promote sustainable lifestyles, an issue of at least equal significance, unless holistic solutions can be found to address the transport challenges. To our mind, it will be challenging to make a convincing case for this level of development in this location. It will be for the local authority to weigh this against the potential economic and social benefits presented by the scheme. Notwithstanding this, we believe a stronger design hand with a more persuasive vision is required for Dunsfold Park, linked to a clearer idea as to how it should be procured. The approach to site planning, design and procurement should reflect the innovation that is evident in the environmental technologies being developed on the site. In light of the concerns raised above, we do not think that planning permission should be granted for this proposal in its current form. We would have liked to see this scheme at an earlier stage. However, we would welcome the opportunity to see this proposal as it develops.

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## **Environment Agency**

NO OBJECTION to the application as proposed subject to the imposition of a number of conditions which are detailed below. Comments in response to this planning application can be divided into four main issues which are dealt with in turn:

- Flood Risk;
- Ecological Conservation;
- Groundwater Protection; and
- Water Resources.

### Flood Risk

#### SURFACE WATER

The FRA highlights that there will be a risk of flooding from surface water during the construction phase. However if this is managed appropriately with temporary storm drains or perimeter drains as mentioned in the FRA the risk of offsite surface water flooding should be minimised. We agree with and encourage the approach proposed in the FRA for the applicant to consult the local authority and the EA for each phase in the development.

In section 4.4 of the Dunsfold Park Sustainable Drainage Strategy (FRA) it indicates that an additional 30% allowance for climate change has been incorporated in all surface water design

calculations, as required by PPS25. However in many volumes of the Dunsfold Park application (including the FRA) the allowance for climate change within the drainage design has been omitted from the text. This should be clarified.

The runoff from the site shall not exceed greenfield runoff rates. The surface water design calculations should also take volumes of surface water into account in calculations, proposed volumes of surface water from the site shall not exceed existing greenfield volumes. Where possible we would seek a reduction in run off rates and volumes from the existing site.

The FRA has split the site into geographic locations and assessed the drainage of each area. It is important at this stage that an overall strategy is in place to guide sustainable drainage development over the proposed phases.

The north east area of the site is the only area where the required surface water attenuation is greater than the actual storage available. A further 500 cubic metres of storage is required. The FRA believes it is possible to attenuate this additional volume because of the conservative calculations. Further information should be submitted to the EA to demonstrate that there is sufficient surface water storage available in this area of the site.

In the north west and south east areas calculations set out in the FRA indicate sufficient surface water attenuation is available to achieve Greenfield run off rates. *For the south east area the FRA states that the storage is available in the north west area, this might be a typo? Please confirm.*

We welcome the application of the SUDS management train on site and we support the inclusion of green roofs. In the Hydraulic Design Criteria (Volume 15, Water Strategy) section 4.3.7 it states that SUDS will be linked with conventional pipe network. We would have no objection to pipework where practical but we would encourage the use of swales and open channels for example to link SUDS features on site. The extent of such pipe work has not been indicated (we wouldn't expect it at this stage).

As stated in Chapter 16 of the Environmental Statement there will be a change in flow to local watercourses. Infiltration and in turn baseflows will be reduced and there will be an increase in the rate of flow leading to rapid water level rise. Sustainable urban drainage techniques shall be carried out on site to prevent this increase in flow and increase in flood risk downstream of the site.

#### FLUVIAL FLOOD RISK

A free spanning bridge has been proposed over the Wey and Arun canal that lies within Flood Zone 3. This section of canal is not classed as main river by the EA. The bridge will provide road access to the A281. We have no objections to the proposed bridge if the applicant can demonstrate that there will be no detriment to flood flows or increase in flood risk off site. Level for level floodplain compensation would be required for any development within the 100 year plus 20% climate change floodplain.

#### OUTFALLS

There are currently multiple outfalls into the Wey and Arun Canal. It is proposed within chapter 16 of the Environmental Statement that these are replaced with 1 larger outfall at the summit of the canal. If this was to take place works should be undertaken to prevent scour.

#### GROUNDWATER FLOOD RISK

We have no objections to raising floor levels by 300mm to protect against groundwater flooding.



Due to the above we recommend that the following conditions are imposed on any planning permission granted:

CONDITION 1: No development approved by this permission shall be commenced until a scheme for the provision and implementation of an acceptable surface water run-off strategy has been submitted to and approved by the Local Planning Authority. The scheme shall be completed in accordance with the approved programme and details.

REASON 1: To prevent the increased risk of flooding.

(Note: We ask to be consulted on any details submitted in compliance with this condition).

CONDITION 2: Prior to the construction of the free spanning bridge over the Wey and Arun canal a scheme shall be provided and implemented to demonstrate that flood risk will not be increased on or off site.

REASON 2: To prevent the increased risk of flooding due to impedece of flood flows and reduction of storage capacity.

(Note: We ask to be consulted on any details submitted in compliance with this condition).

### Ecological Conservation

We welcome the areas proposed for nature conservation at the site.

The linking of newly created semi-natural habitats to the existing adjacent habitats could benefit the latter. However, careful design and management is vital to ensure that there is no detriment to the existing habitats, particularly those within the various Sites of Nature Conservation Importance that surround the site.

A number of new water features and wetland habitats are proposed, including streams, ponds and reedbeds. Whilst we welcome their inclusion, careful consideration must be given to the water sources to feed these features. Existing adjacent watercourses and wetland habitats must not be adversely affected, for instance by any changes in hydrology. We also recommend that proposed semi-natural water features are kept separate from other proposed more formal features such as those within the 'runway park'. All new watercourses and standing water bodies should have a minimum of a 5m wide undeveloped buffer zone on either side. All new planting (apart from formal landscaped areas), should be of native species appropriate to the area and preferably of local provenance. It is also important that a long-term management plan is written, to maintain the biodiversity and nature conservation interest of the newly created habitats.

Ideally, all existing wetland habitats including streams, ditches, ponds and marshy grassland should be retained, enhanced and possibly expanded where feasible. Where any such habitats are lost, they must be compensated for/recreated elsewhere on the site.

The proposal involves the demolition of buildings which might potentially offer bat roosting opportunities. Buildings to be demolished should be inspected for bats prior to work starting, with Natural England being contacted if any bats are found. All species of bat in Britain and their roosts are afforded special protection under the Wildlife and Countryside Act 1981. The incorporation of bat roosts into the design of buildings should be considered. This includes using bat bricks, roost units, boxes and/or slates.

Essential tree felling, branch lopping or scrub clearance should avoid the bird nesting season (generally March to August inclusive). This avoids disturbing wild birds during a critical period and will help to prevent possible contravention of the Wildlife and Countryside Act 1981 which protects nesting wild birds and their nests. Bird nesting and roosting sites should be built into the new structures through the incorporation of ledges, crevices and holes, where possible.

All suggested mitigation and further surveys for habitats and species in Chapter 11 of the Environmental Statement should be carried out. Due to the above and the necessity to protect

and enhance the conservation value of the site we believe that the following conditions are necessary:

CONDITION 3: A landscape management plan, including long term design objectives, a planting scheme, management responsibilities and maintenance schedules for all landscape areas, other than small, privately owned, domestic gardens shall be submitted to and approved in writing by the Local Planning Authority before the development commences. The landscape management plan shall be carried out as approved.

REASON 3: To protect/conservate the natural features and character of the area.

*(Note: We ask to be consulted on any details submitted in compliance with this condition).*

CONDITION 4: No development approved by this permission shall be commenced until a detailed mitigation strategy has been approved by and implemented to the satisfaction of the Local Planning Authority.

REASON 4: To protect and conserve the biodiversity of the site.

*(Note: We ask to be consulted on any details submitted in compliance with this condition).*

CONDITION 5: Any proposed water features shall be constructed in accordance with details which shall be submitted to and approved in writing by the Local Planning Authority before the development commences.

REASON 5: To ensure that those features enhance the conservation value of the site and provide undisturbed refuges for wildlife using the river corridor.

*(Note: We ask to be consulted on any details submitted in compliance with this condition).*

CONDITION 6: Buffer zones 5 metres wide alongside all existing and new semi-natural watercourses and standing water bodies shall be established in accordance with details which shall be submitted to and approved in writing by the Local Planning Authority before the development commences. The width of these buffer zones may have to be increased beyond 5 metres if any buildings bordering the buffer zone are greater than two storeys in height.

REASON 6: To maintain the character of the watercourses and provide undisturbed refuges for wildlife using the river corridor.

*(Note: We ask to be consulted on any details submitted in compliance with this condition).*

Groundwater Protection. We consider that the controlled waters at this site are of low environmental sensitivity, therefore we will not be providing detailed site-specific advice or comments with regards to land contamination issues for this site.

It is recommended that the requirements of PPS23 should be followed.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed off site operations is clear. If in doubt, we should be contacted for advice at an early stage to avoid any delays.

#### Water Resources

We would prefer that the source of supply of the potable water is from an area where water resources is more plentiful, so as not to exasperate the problem in an already water stressed area. We encourage the use of the proposed water efficiency measures such as water harvesting and similar measures in order to protect the area's water resources.

The lakes, ponds and other varieties of waterscape features may require an abstraction licence in order to fill and maintain levels. Please contact the Thames SE area Environment Planning Team to discuss this further on 01276 454478 and see our website regarding abstractions and the Wey CAMS.

We recommend that you carry out a more detailed water cycle study as this should help clarify a few of the points raised above.

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## **Thames Water Authority**

### Waste Comments

Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed. "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 01923 898072) prior to the Planning Application approval.

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

### Water Comments

The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

With regard to the proposed development Thames Water would require phasing in accordance with Government Guidance PPS12 to ensure suitable water supply infrastructure is in place in time to serve the new development. To ensure Thames Water has sufficient lead-in time to provide such additional services, development phasing should be controlled by a planning condition or Section 106 agreement of the Town & Country Planning Act. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand

Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The

developer should take account of this minimum pressure in the design of the proposed development.

### Supplementary Comments

Thames Water is concerned about the sewerage treatment capacity of Cranleigh STW to cope with the demand anticipated from this development. An impact assessment, funded by the developer, would be required. Where an upgrade of the treatment works is required, up to three years lead in time would be necessary.

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**Southern Water** - Does not wish to comment

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## **Natural England**

### General comments

Natural England notes that the application includes the following:

- Provision of accessible natural greenspace within the development to meet Natural England's Accessible Natural Greenspace Standards (ANGst). There should be provision for the long-term management of these areas – through contribution – in a section 106 agreement.
- The suggestion that all the houses should be constructed to maximum energy efficiency standards.
- A combined heat and power plant intended to help build viability of woodland management in the local area.

The sustainability appraisal of alternative locations does not appear to include potential impacts on protected sites, e.g. SSSIs and SACs, other than Wealden Greensand Heaths and Thames Basin Heaths.

It is unclear from the application whether it is assumed that the Wey and Arun canal – which is presently disused – would be restored. If it is proposed that the canal is restored, as implied on the plan drawings and in the inclusion of the canal basin, the potential environmental impact of the canal restoration would need to be assessed.

### Environmental Impact Assessment

#### Landscape and visual amenity

The site lies within the Low Weald Character Area which is rural in character with dispersed farmsteads and small settlements. The character assessment notes the contrast between the urban sprawl of Gatwick and Horley and the pleasant, wet, woody rural character of the area. Natural England considers that the development would have a negative impact on the landscape character.

#### Ecology and nature conservation

Natural England notes:

- that the provision of a country park within the application footprint is intended to mitigate increased recreational impacts on Chiddingfold Forest SSSI.
- that all ancient woodland and BAP habitat on the application site will be retained and arrangements will be made for its long-term management through a Section 106 agreement.
- That a network of semi-natural habitats will be created across the application site.

Natural England considers that the mitigation for protected species is appropriate. Potential lighting impact should be considered, particularly in relation to the bat species. The Bat Conservation Trust have recently created some useful guidance on lighting may inform this consideration.

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## **Surrey Wildlife Trust**

The proposed development is adjacent to a large number of important habitats, including Sites of Special Scientific Interest (SSSI) and 11 Sites of Nature Conservation Importance (SNCI) within 1km. The Trust is concerned that a development of this size and type will have a significant effect on these habitats and animals in the vicinity. The development would represent a significant increase in human presence in the area and consequently disturbance to wildlife and habitat. Additional traffic, pollution incidents, fly tipping and pet activity can all have a significant adverse affect on wildlife. The area has been surveyed and several species of legally protected species have been found on site including, bats, badgers and great crested newts. In addition various Red Data Book and Biodiversity Action Plan (BAP) Priority Species and Habitats would also be affected. If the development were granted it would be essential that all the mitigation proposals contained in the Ecology Section of the Environmental Statement (ES) be conditioned.

The ES for this proposal details the potential effects of this development on species and habitats in the locality and lists a number of mitigation proposals to offset adverse affect. The Trust however has a number of particular concerns relating to these, which the Local Authority should consider.

- Grassland.

We are concerned that an area of grassland, identified in the Phase 1 survey, as MG5 will be directly affected by the development. This semi-natural/unimproved neutral grassland is of very high conservation value and is a scarce resource nationwide. The Trust would recommend that as this area represents a very important habitat, it would be of value to carry out further survey work to confirm its classification. We have some concern regarding the identification of species. If it is confirmed by survey as G5 grassland we would strongly recommend that this area be retained and protected from the development process.

- Bats.

It will be necessary to update bat survey work closer to work starting to ensure that the status of bats on the site has not changed since the last survey, particularly if there is a time delay of 6 months or more. Natural England as the statutory authority must be satisfied with the mitigation proposal method statement and have issued the necessary licences. Details of further bat mitigation work in the development should be agreed when they are made available.

- Badger

It will be necessary to re-survey for badgers prior to any work commencing on site to establish the current status of badgers on the site and the required mitigation. Natural England will need to approve the mitigation proposals and issue a licence for work proposed to any sett. Badgers are particularly susceptible to traffic and it may be necessary to consider the installation of badger tunnels under any new busy roadway.

- Amphibians and Reptiles.

It would be necessary to translocate animals if the scheme were approved. The Trust would recommend that animals are not translocated off site whenever possible. Suitable receptor sites must be identified and surveyed to ensure that they are suitable for the populations to be moved. Mitigation method statements should be approved by Natural England and they will need to issue licences to allow the movement of great crested newts.

- Birds

The size of this proposed development and the duration of the development process is likely to have a significant adverse affect on the existing bird populations on site, which include a number of BAP and Natural Environment and Rural Communities (NERC) Act (2006), priority species. If the development is granted, suitably enhanced habitat should be made available, before work commences, to provide alternative breeding and feeding sites for birds displaced by the development process. This is particularly relevant for ground nesting birds, such as skylarks, which will be displaced when the grassland on the airfield is developed.

- Invertebrates.

In addition to proposals to enhance existing habitats for species, new habitats should be created, including areas of bare ground, particularly on south facing slopes.

- Landscape Management Plan (LMP)

The LMP must include a financial agreement to ensure that all the conservation measures, plantings, habitat enhancements and special species provisions are maintained and allowed to develop. A programme of species and habitat monitoring should also be included to help ensure that mitigation measures are working and that no species or habitat is suffering adverse affect.

A Construction Method Statement should be agreed as a condition to ensure that best ecological practise is followed during the construction process.

An Information and Interpretation Scheme should be produced and agreed to inform the new residents of the proposed developments ecological features, their importance and how they will be maintained. This should also include the maintenance of urban features such as green roofs and a sustainable drainage scheme and how to ensure that they work successfully.

The Trust would welcome the opportunity to comment further on this proposal when further protected species survey information is made available and more details of mitigation proposals have been developed.

### Surrey County Council Education

As well as securing nursery provision, and provision of a site plus 2FE primary school, with scope to expand to 3 FE, on current costs the secondary contribution would be about £6.5M (assuming 75% 2+beds) - see below.

It is likely that revised contributions would be significantly higher as we need to bring requests in line with actual costs.

<b>Number of Units</b>	<b>2601</b>	Assuming 75% eligible for contribution	
<b>75% of Units</b>	<b>1951</b>		
<b>Non-Tariff small developments</b>			
<b>Forecast Pupil Yield</b>		<b>Potential Contribution</b>	
Primary	<b>487.7</b>	Primary Contribution	
Secondary	<b>351.1</b>	Secondary Contribution	<b>£ 6,343,858</b>
		<b>Not Rounded</b>	

Without full mitigation, the development would not be acceptable.

### Surrey Constabulary

This proposed development will undoubtedly impact on the existing community and has the very real capacity to increase criminality and antisocial behaviour levels in the ward. This application is for a new community with about 2,600 new dwellings, shops, Restaurant/cafes, Public House, Take away food, Offices, Light and general Industry, storage and distribution, Hotel, and community buildings including health centre, schools, place of worship, museum and community centre, sports centre and recreational facilities, plus retention of helicopter flights.

Given the number of dwellings which includes sheltered housing, student accommodation and overnight rooms, I would assume a resident population of about 6,000 persons with a broad mix across all ages and backgrounds. There would also be a large number of working persons using the commercial premises within the site on a daily basis.

### General Description of Site

I have spoken with Waverley Borough Council and 'Farncombe' would be the nearest community with a population and mix similar to the proposal at Dunsfold. This has a population of about 8,000 people and has a commercial mix although not as segregated as proposed at Dunsfold. Farncombe is also closer to larger Towns rather than the more isolated area of Dunsfold.

### Crime Issues at Location

A simple check of recorded crimes in Farncombe, on our crime computer shows about 500 recorded incidents over the past twelve Months. If we allow a 20% drop due to Farncombe's higher population then I would expect an annual rate of about 400 crime incidents. This figure does not include road traffic incidents or non urgent records.

This is a simple projection and given the rural nature of Dunsfold and the opportunity to design out crime it should be lower than this rate

### Crime Pattern Analysis

Included within the application are three statements I would strongly support:

- 'Secured by design' accreditation will be sought for all accommodation.
- Guidance from 'safer places – the planning system and crime prevention'
- Consultation with the local Police

Good points are also:

- Appropriate lighting for vehicle, cycle and pedestrian routes
- Footpaths and all public spaces will be overlooked wherever possible by buildings
- Public spaces will be designed in the context of a long term management plan
- Security and safety for residents and visitors, with particular attention to the needs of vulnerable groups, will underlie decisions on all aspects of the master plan and the detailed design process, and will be closely interwoven into decisions on approaches to management

### General Risk Assessment

The typical security issues during the developments of this nature are:

- Acts of theft and criminal damage
- Burglary
- Theft from vehicles and theft of vehicles

- Unauthorised access through the site, into the buildings and amenity spaces resulting in criminality and antisocial behaviour

### Site Specific Risk Assessment

At this early stage of consultation detailed comments are not required or available, however I would raise concerns over the potential increase of mixed traffic routes, noise, anti social behaviour particularly around the licensed premises, crime in the commercial area, vehicle crime and crime in the community.

There are a variety of means, of looking at these issues and impacting upon them.

If permission is granted then there is a risk of theft of plant and materials at the site whilst building is ongoing. Advice around secure areas would need to be given.

The mixed traffic concerns needs careful consideration at an early stage. Large lorries using the business park appear to be segregated, but schools and community areas appear to have little parking opportunity for staff and visitors and may provide conflict with pedestrians. A series of one way systems may alleviate some of these problems. Consideration of traffic calming needs to be done particularly along the straight areas of roads. Traffic calming will reduce the opportunities for the antisocial use of vehicles

I can see no designated areas for the different groups of young people. They will need safe open areas where they can be overlooked but with reduced opportunity for creating noise too close to the community.

Although restricting different licensing hours can help to reduce the impact around alcohol, the proximity of a food take away with a public house/hotel may provide the opportunity for persons to leave the licensed premises and then hang around creating noise and damage in the area around the food take away provision. This needs careful management and approval.

There is an existing CCTV system at the site and I would support the retention and expansion of this system particularly for the commercial premises, public buildings and spaces and the exit/entry routes. Consultation needs to be started with any management company on the recording and monitoring of the system. It would be expensive to take the signalling away from the site and discussions are needed to provide a suitable Police response and evidential links. From the plans the parking barns would allow covered parking within a shared space for the community. My concerns would be over parking facilities for visitors and staff of the various commercial properties and public buildings/spaces. There is a standard of car parks approved by ACPO called 'park mark' and this needs to be achieved.

It is often perceived that cul-de-sacs are less prone to crime issues than through roads. This is not necessarily the case and will be further aggravated by the fact that the proposed development is bordered onto open land.

Design features can help to identify the acceptable routes through a development, thereby encouraging their use and in doing so enhance the feeling of safety. Where it is desirable to limit access/use to residents and their legitimate visitors, features such as rumble strips, change of road surface (by colour or texture), pillars or narrowing of the carriageway may be used. This helps to define the defensible space, psychologically giving the impression that the area beyond is private.

It is imperative that the new development continues to be well maintained and managed from both a security and environmental perspective. Failure to do this could put not only this development at risk from criminality but also neighbouring premises, should criminals be attracted to this development.



### Target Hardening and Secured By Design (SBD)

Full details can be found at:

[http://www.securedbydesign.com/pdfs/SBD\\_New\\_Homes\\_2007.pdf](http://www.securedbydesign.com/pdfs/SBD_New_Homes_2007.pdf)

### Lighting

A lighting scheme is required, to BS5489 standard, for the site. This lighting should be designed to provide a uniform spread of light to an average of 0.4Uo and never less than 0.25Uo at any point, clear colour rendition, avoiding deep shadows and minimising light pollution. Luminaires should be sturdy and vandal resistant.

### Signage

Use of signage is also important in preventing unauthorised access in and around the development. Adequate signage should be displayed in all areas to not only direct people through the site, but to deter access.

### Bin Stores and Bike Storage

Bin and bike stores should be lockable and positioned in such a way that they are visible from living areas, but do not provide an easy climbing aid to entering or leaving the grounds of the site.

### Conclusion

I believe there should be a s106 application made on this site due to the potential increase of crime and incident impact on the levels of local Policing in a normally quiet and rural area.

This should be an application for:

An extra NSO and PCSO with a clear contract for these Officers not to be in that area when operationally required elsewhere

A suitable vehicle

A purpose built office and garage to allow for a base on site. This could be attached to a public building such as a community hall. Ancillary support equipment, such as a link to our computer systems. An outside emergency phone link to our command centre

Any additional CCTV and monitoring equipment that may be identified as assisting Policing during discussions with the management organisation.

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**Surrey Fire and Rescue** -No comments received

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### **Sport England**

Sport England have considered the application in relation to Sport England's Land Use Planning Policy Statement 'Planning for Sport and Active Recreation: Objectives and Opportunities' and our guidance 'Active Design'. The overall thrust of these documents is that a planned approach to the provision of facilities and opportunities for sport is necessary in order to ensure the sport and recreational needs of local communities are met.

Sport England attended a consultation event on 5<sup>th</sup> December 2007 as part of stakeholder engagement for Dunsfold Park and made recommendations for the development proposals in a letter dated 12/12/07 to the developer.

### Support for the planning application

With the proposed development providing housing for approximately 6,094 residents, Sport England is pleased that the applicant has prepared an Open Space, Recreation and Access to Nature Strategy. Sport England notes that this strategy has been based on local assessments of need which is in accordance with Sport England's Planning Policy Objective 1, which seeks to ensure that a planned approach to the provision of facilities and opportunities for sport and recreation is taken.

The strategy states that the existing provision of open space and recreation facilities in Waverley is generally good but that the proposed development is a new settlement and therefore needs to provide for its new population. We support the proposals for 152.7ha of parkland and landscaped areas to be provided outside the main village area, as this will provide opportunities for active recreation and given the development's rural location promotes the use of and access to natural resources. Areas of play are also proposed which will meet the standards set by Fields in Trust. These proposals are also in accordance with Local Plan Policy H10 Amenity and Play Space.

Additionally, Sport England support the use of the parkland to provide outdoor sports provision to include a number of football, cricket and rugby pitches, a bowling green, tennis courts and a sports pavilion, which is proposed to cater for all ages and the disabled. These areas will provide the new community with both formal and informal areas for sport. The design layout and the creation of cycle ways, both on and off site, and pedestrian corridors is encouraging, as this will help promote healthy lifestyles by supporting cycling and walking and creating accessibility to facilities.

As noted during consultation, a Sports Centre is proposed to be built in the village centre and the strategy states this will include at least 2 courts, therefore addressing the need calculation using Sport England's 'Sports Facility Calculator' as recommended in our letter dated 12/12/07. In relation to swimming pool provision, we recommended in our letter to the developer, that 59.36m<sup>2</sup> of swimming pool space is required for the population increase. The strategy states that 'there is potential for a swimming pool to be included as part of the on site Sports Centre'. We would recommend that this level of provision is secured through planning obligations (see section below) and conditions to ensure the development adequately meets the needs of the new community.

We are pleased that the management of open space has been considered and that a Landscape Management Plan will be prepared to guide management for the first ten years after completion. We recommend this is secured as part of the section 106 agreement.

#### Planning Obligations

Sport England recommends that in order to provide sport through new development, planning authorities should ensure that adequate provision of sports facilities is **secured** as part of major development.

Sport England has adopted the following policy objective to address this issue:

#### Planning Policy Objective 8

*"To promote the use of planning obligations as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development"*

Sport England understands that Waverley Borough Council has recently adopted a Supplementary Planning Document called 'Planning Infrastructure Contributions'. This document outlines tariffs for infrastructure which will inform Section 106 agreements. Specifically, there are tariffs for sport and recreational facilities required for new residential development. The Dunsfold Park application is proposing to provide these facilities as part of the development.

Sport England notes that there are draft Section 106 Heads of Terms accompanying the planning application and is pleased that land will be reserved for open spaces, playing fields, a new pavilion and new areas of woodland and parkland available for public use in accordance with Local Plan Policy D14. However, the provision of a Sports Centre including a swimming pool in the village centre is not included in the list of land to be reserved in section 7 or as part of the list of facilities to be built in section 9. In accordance with Sport England's policy objective 8 It is recommended that the Sports Centre and swimming pool provision is included in the

heads of terms either as on-site development or using the tariffs set out in the SPD to secure off site contributions to enhance nearby existing facilities.

Sport England supports the use of planning obligations to secure future maintenance of either new or existing places for sport. Financial contributions for the up keep of these areas and facilities would ensure resources are adequately maintained. The SPD states that 'where provision is made on larger sites, the negotiated agreement will include the agreed contribution towards maintenance'. These contributions would therefore need to be included when the Section 106 terms are finalised.

Provided the above points in relation to planning contributions and maintenance of the proposed sport and recreation facilities are secured, Sport England would wish to **support** the planning application.

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### **Surrey Primary Care Trust**

Could you actively involve me in any residential development discussions before decisions are made. I'm not sure if the effect on health is understood and I would be keen to see solutions provided within the proposal either literally, legally or both.

I'd like around £3 to £4million s106 contribution please.

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### **National Air Traffic Service**

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Limited has no safeguarding objections to this proposal.

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### **West Sussex County Council**

From the transport evidence provided, the application will result in a projected increase in motor traffic on the A281 from the County boundary of approx 30% or more. This is likely to result in an unacceptable reduction in the level of service on this road, which forms part of the West Sussex Strategic Road Network as defined in the West Sussex Transport Plan Figure 6.11. This increase in local traffic and reduction in level of service is incompatible with our LTP objective to:

Manage our strategic road network to maintain its efficiency and effectiveness and to encourage HGVs and larger distance traffic to use it (West Sussex Transport Plan para 6.2.4.1)

No attempt has been made to analyse or quantify the effect of this increase in traffic on highway link capacities in the rural area.

The level of increase in traffic may result in noise and nuisance to frontagers along this corridor, which has not been quantified

The projected traffic increase on A281 may also result in road safety impacts which have not been adequately quantified and addressed.

Although some analysis has been undertaken of the junctions with the A29/A281 near Slinfold, these would be over-capacity as roundabouts, whilst a proposed traffic signal improvement appears to rely for its capacity on long dual approach lanes, which are unlikely to be achievable within highway boundaries and would hence require third party land not under control of the applicants.

No analysis has been undertaken of the junction of A281 with B2128 at Rudgwick, particularly with regard to right turning movements.

Although the traffic distribution information provided only allocates a small %age of the traffic to "West Sussex" I am concerned that this may well exclude the rather higher %age allocated to local traffic within a few Km radius. The directions of this local traffic is not broken down in detail. There is insufficient information on possible increases in traffic on local rural lanes within West Sussex such as Dunsfold Road, Shillinglee Road, The Street (Plaistow), Loxwood Road, Rickmans Lane, Plaistow Road and the B2133 Guildford Road / High Street through Loxwood, to determine its acceptability or otherwise.

The projections of use of the proposed bus service to Horsham Town Centre and Rail Station may not be robust. It is unclear what incentive residents would have to use this service, when it may be subject to delays caused by the increase in car traffic from this development. The application may not have considered the combined effect on A281 of the proposed development with the committed LDF strategic development situated to the west of Horsham, south of Broadbridge Heath.

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### **Chichester District Council**

Thank you for the opportunity to comment on this application. The comments outlined in this letter are officer level comments only. I object to the application because of concerns set out below.

I am concerned as to the prematurity of the application, ahead of the production of Waverley Borough Council's Core Strategy. As I understand, work is underway on the Issues and Options, evidence gathering is underway including the Strategic Housing Land Availability Assessment which will form part the evidence base for Local Development Framework documents and help to determine the most suitable sites for development within the Borough.

I consider the proposed development, so close to the Boundary to Chichester District, is likely to impact on the District and its residents. There is concern as to the pressure on the existing services and infrastructure in the area, particularly highways, such as the B2177 going through Loxwood and Billingshurst. Although the outline application proposes a wide range of facilities alongside the housing, I am concerned that the proposal for 2601 dwellings will be unable to support the development of a sustainable settlement, leading to concern that future residents may need to travel outside the development for a number of facilities, putting pressure on nearby facilities in the north of the Chichester District as well as Waverley Borough.

The north of Chichester District and part of Waverley District is part of the West Wealden Landscape Project Area, which Chichester District Council supports and part-funds. This project was set up understand, protect and enhance the landscape and habitats of West Wealden Landscape.

I am concerned as to the effects the proposed development may have on the internationally important sites (Special Areas of Conservation) of Ebernoe Common and The Mens, within the West Wealden Landscape Project Area. Ebernoe Common is an important site for bats, with 14 species of bat including the rare Barbastelle Bat. The Barbastelle Bat flightlines follow natural features such as streams as long as these retain sufficient cover in close proximity. The report by English Nature in 2004 (link attached) goes into detail on the flight lines and advice for the management of the flightlines and foraging habitats of the Barbastelle Bat in this area. The flightlines go in many directions leading from Ebernoe Common, maps detailing these are enclosed within the report. The potential effects this development may have on the protection of these bats and their habitats, including their flightlines should be a carefully considered. Chiddingfold Forest SSSI crosses the border of Chichester District and Waverley Borough, it is considered that any potential on this protected site should also be considered.

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## Horsham District Council

It is noted that the rationale for the level of housing development proposed includes:

- A lack of market housing including smaller units and a lack of affordable housing in the Cranfold area;
- The applicants housing land supply assessments shows a 5 year deficit of housing in Waverley, Guildford and Horsham;
- The need for significant additional housing in this area;
- Problems recruiting suitable labour in the Cranfold area;
- Extended travel to work patterns for employees in Cranfold need to be reduced;
- Provision of housing for the existing skilled workforce in the area.

### *Housing Supply*

In relation to housing supply, this Council's development strategy for the period to 2018 as set out in the adopted Horsham District LDF Core Strategy (2007) prioritises the reuse of previously developed land in sustainable locations followed by the provision of two urban extensions. It was acknowledged by the Inspector at the examination into the Core Strategy that this Council's overall 10 year housing requirement would be met although there would be shortfalls in the middle years of the plan period. The Council is committed to preparing a Reserve Housing Sites DPD which will provide the Council with the flexibility to meet its housing requirements in the first five years and the Core Strategy was found to be sound on this basis. The Reserve Housing Sites document is now at the Preferred Options stage. In light of this position, this Council does not accept that the housing land supply position within Horsham District provides any justification for the level of housing proposed at Dunsfold Park.

### *Transport/Environmental Issues*

In relation to transport issues, the applicant's trip generation analysis which has been used to forecast likely travel profiles of residents of the development estimates that there would be 4200 trips by car into and out of the site on a daily basis, of which some 2000 would occur in the peak periods. In addition, given the proposal to increase the number of jobs at the site to 2000, it is also forecast that there would be a further 2000 external daily trips by employees of businesses at the site, the majority of which would be during the peak hours.

In housing and transport strategy terms, it is considered that the fundamental failing of the site is that it lies in a relatively remote, isolated and unsustainable location with poor access to alternative means of transport to the private car. The main service and employment centres are Guildford (10 miles), Godalming (7 miles) and Horsham, 11 miles away. The site has no direct access to the rail network with the closest station being at Godalming, 9 miles from the site. Bus services in the area are infrequent and there are no services directly serving the site. In relation to vehicular traffic, none of the roads in the vicinity of the site are part of the strategic road network, with the A281 being the most significant road in the area. This road is heavily trafficked and suffers from congestion along its route. Apart from the A281, there is a network of minor local roads only.

Consequently, although it is recognised that a package of transport measures aimed at reducing car travel forms part of the proposals, it is considered that in principle, development of the scale proposed would be likely to have a significant adverse impact on the surrounding road network. This Council is particularly concerned that the increased volume of traffic associated with the development, both during the construction and operation phases would be likely to result in harmful environmental effects in the north-western part of Horsham District, including Rudgwick Parish, in terms of increased levels of congestion on the A281, particularly

during peak hours and on nearby rural roads. This would also be likely to lead to a detrimental effect on air quality and noise levels within the Horsham District.

With Dunsfold Park situated to the west of Horsham, it is likely that the A281 will act as a trunk road for vehicles accessing the A24 and M23. The A281 passes through Broadbridge Heath, which is subject to a proposed strategic scale residential development arising from this Council's adopted Core Strategy ('West of Horsham strategic allocation'). There is therefore further concern that the combined impact of traffic generated by the two developments is likely be significant in terms of traffic related air pollution levels and noise levels at properties along the A281 within Horsham District.

Within the context of these significant concerns, the Environmental Statement has been examined and whilst there are air quality and noise evaluations for the Dunsfold Park development, the scope of the assessment is limited to the area immediately around the site and does not extend to the impact on trunk roads passing through neighbouring authorities. The absence of predicted traffic data for the wider area including the A281 where it runs through this district precludes a fuller assessment of the wider impact of this development on Horsham District.

Notwithstanding this overriding objection to development of the site, the applicants transport strategy explains that the proposed development aims to achieve a significant level of self containment between jobs and occupiers of the dwellings at the site in order to create a self sustaining 'village'. To achieve this, it is noted that targets would be set in relation to:

- Increased working from home, via provision of broadband access and shared IT facilities in the village centre;
- Travel to work patterns:
  - to increase the proportion of residents of the development also working at the site due to provision of 2000 jobs;
  - to increase the attractiveness of the existing jobs in the area known as 'Cranfold' by implementation of transport improvements;
- Reducing longer distance in commuting (10km and over) to 'Cranfold' by provision of a range of housing at the site and environmentally friendly transport to key interchanges.

A range of internal and external transport measures are proposed in order to achieve these targets. Within the site, these include a car restrained area; parking restrictions and provision of a transport hub to promote use of environmentally friendly forms of transport within the site.

Beyond the site, transport measures are proposed which aim to reduce the level of car trips by residents of Dunsfold Park travelling to work; for shopping, leisure and education trips and to reduce car trips by in bound commuters to the businesses at the site. These include provision of additional bus services to Guildford, Horsham and Cranleigh; an incentive scheme to purchase electric vehicles; on line car sharing schemes; provision of a new pedestrian/cycle link to Cranleigh; a car user charging scheme which would involve levying a charge on all vehicles leaving the site and a workplace parking charge within the site. The applicants forecast that these measures would achieve an overall reduction in resident car trips off the highway network of 39% and reduce employee car trips by 20%.

The proposed improvements to bus services involve enhancements to existing services and provision of three new routes. The transport strategy acknowledges that these would need to be subsidised in order to break even and funding from the cordon charging scheme is identified for this purpose. However, whilst some aspects of the proposals are considered to be innovative, it is considered that the overall transport strategy which necessitates provision of significantly enhanced bus services to address the shortcomings of the isolated location of the site is a serious weakness in the proposals. There is no guarantee that this strategy would

achieve the forecast modal switch which would not only result in significantly increased levels of traffic on the surrounding road network but would also have implications for bus revenues and could lead to a need for further subsidy. In turn, the reliance on the cordon charge to subsidise bus services is also a concern as this source of funding may not prove to be implementable in the way currently proposed and/or may not achieve the revenue forecast.

The mitigation measures rely on achieving a substantial shift in modal patterns from car journeys to bus services in particular and on a 'carrot and stick' approach which may prove to be unrealistic and overly ambitious. For example, it is considered that the target of 35% of resident trips to Guildford, Godalming and Horsham being transferred to alternative modes is unlikely to be achieved through provision of improved or additional bus services which, in practice, would be the principle alternative mode of travel available.

Furthermore, it is evident that the strategy involves a range of different measures working together to reduce travel by the private car and it is considered that this also represents a potential weakness in the approach. Failure in one area would be likely to have implications for other parts of the strategy and therefore for the level of self containment that could be delivered by the development. Whilst imaginative and comprehensive, it is considered that the transport strategy has many potential weaknesses and that there is an over reliance on its success in order to reduce traffic levels.

However, it should be noted that even if these measures were successful which is considered unlikely, significant additional levels of traffic would still be generated by the development both by new residents and employees of the businesses at the site.

The proposed policy of prioritising on-site workers for affordable housing forms parts of the strategy to reduce travel needs and from this Council's perspective, this approach could assist to a limited extent in meeting the housing needs of the northern part of this District. However, it is unclear how these priorities would be managed and it is noted that this strategy would be for a restricted period only. It is considered therefore that this approach would be likely to have limited long term impact in reducing car travel arising from the development. It is also noted that the open market units would be marketed to workers at Dunsfold Park for 3 months from first release and again whilst the general aim is sound, it is not considered that this would have any significant long term impact on traffic generation on the local highway network.

#### *Consideration of Alternatives Sites*

It is noted that the EIA looked at a number of alternative sites where a development of 2,600 homes could be accommodated and subjected them to a sustainability appraisal. The Dunsfold Park site was assessed as being the most sustainable, but the assumptions and findings of this process are, in this Council's view, questionable. For example, the study found that an extension of Guildford would be less sustainable, but states development of either site would result in similar levels of traffic generation. It is considered that trips from Dunsfold Park are likely to be longer and more polluting than those originating closer to Guildford which is a large employment / retail centre. There are also likely to be existing public transport services that could be more cost effectively extended into any new development at Guildford, whereas public transport services at Dunsfold Park may not, as referred to above, be viable in the longer term.

#### *Hydrology*

The EIA notes that there is potential for development of the site to affect the quality of the stream passing through the site - which is a tributary of the River Arun. Some consideration is given to the downstream impacts that this may have - e.g. on the Arun Valley SPA. Although individually any effect on water quality is likely to be limited, this Council would wish to see greater consideration of any in combination effects that could occur - particularly with the proposals for the West of Horsham strategic location, which also have some potential to affect the water quality of the River Arun.

### *Landscape*

It is noted that that the development proposals include a CHP plant, the design of which includes a 19m high stack. The EIA identifies that the construction stage would have a significant adverse effect on the landscape due to the presence of cranes, but there is no consideration of the long term presence of the CHP stack on the landscape. This is an important omission and the wider landscape impact of this structure should be addressed.

### *Aviation related issues*

The BAA Interim Masterplan for Gatwick retains the option of a second runway at Gatwick although it is currently unclear as to when a definitive decision regarding a second runway will be made. Within this context and in the absence of a decision on the need for a second runway at Gatwick, the historical and continuing use of the site for aviation and aviation related activities is considered to be a material consideration in this application. Dunsfold retains operational runways, hardstandings, aircraft dispersal areas and extensive buildings, as well as a substantial number of employees working at the site. Consequently, this Council's view is that the possible need for, or role that could be played by this site, for example, for aircraft maintenance, repair and storage purposes within the context of potential future expansion at Gatwick should be fully examined prior to any redevelopment of the site being considered.

Overall therefore, this Council's view is that the provision of a strategic scale mixed use development in this location, comprising a significant amount of housing and employment floorspace, together with other uses would be contrary to sustainable development objectives. It would be likely to result in substantially increased traffic levels in the area, including the north-western part of Horsham District. The A281, the main east/west route and other rural roads in the area would be seriously affected and are not suitable or considered capable of accommodating the levels of traffic likely to be generated by the scheme.

This Council therefore formally objects to the application on the grounds that:

- (a) The level of development proposed is not required to help meet the housing requirements of Horsham District; and
- (b) The development would be likely to cause adverse environmental impacts on Horsham District due to significantly increased traffic levels, resulting in increased congestion on roads in the District, increased noise and an adverse impact on air quality.

It is therefore considered that the development would be contrary to Policies CP2 (Environmental Quality), CP4 (Housing Provision) and CP19 (Managing Travel Demand and Widening Choice of Transport) of the Horsham District LDF Core Strategy (2007) and Policy DC40 of the Horsham District LDF General Development Control Policies (2007).

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### **Guildford Borough Council**

Strongly object to the proposal on the grounds that:

It is concluded that this outline application for this new settlement within a wholly rural area south of Guildford Borough is unacceptable, as it is not regarded as a sustainable eco-community despite the applicant's assertions. Significantly, the proposed development of this site has been rejected in principle by the South East Plan Panel last year for the reasons referred to in this report [the proposal for about 2,500 dwellings and 2,000 jobs would seriously unbalance the regional strategy and it would be likely to remain unsustainable and it would be difficult to secure the level of self-containment that might overcome these disadvantages] and the proposal is therefore contrary to draft South East Plan. The proposal



also conflicts with policies LO1 and LO4 of the Surrey Structure Plan and policy C2 of the Waverley Borough Local Plan 2004.

In transportation terms, it is not regarded that this development is sustainable and conflicts with national guidance within PPG13. It appears that much extra traffic pressure will be added to the A281 with its already over capacity junctions and congestion just south of Guildford. The applicant's Transport Assessment fails to consider the impact of the development on traffic in Guildford town centre and also fails to address the potential to reopen the Guildford-Cranleigh railway line. Additionally, the assertion that the A3 and A31 are too remote from the application site to be affected does not appear to be backed up by evidence and it is felt that the Highways Agency may themselves have real concerns over the impact on the A3. The proposal conflicts with policy DN2 of the Surrey Structure Plan 2004.

It is also considered that there will be additional pressures placed upon the existing facilities and services within Guildford. This is likely to apply to such services as hospital facilities and secondary school places amongst others, and at a time when Guildford will have to face the challenges of ensuring sufficient infrastructure to meet the needs of its own required housing growth. It is not considered that the required infrastructure that is required to service the development has been demonstrated will be provided and as such the proposal conflicts with policy DN1 of the Surrey Structure Plan 2004.

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### **Wey and Arun Canal Trust (WACT)**

Any development should ensure that the rural integrity of the canal is preserved. It is strongly suggested that the overbridge crossing the canal at the northern extremity of the land ownership is built with sufficient headroom to allow canal craft to pass below. The roundabout where the new road joins the A281 must also be constructed so that it does not make the restoration of the canal crossing under the A281 any more difficult to construct than it is at present. The WACT suggest that the developers be required to build the A281 bridge over the canal to navigable height as a "planning gain" contribution under a Section 106 agreement.

The south-eastern boundary of Dunsfold Park (DP) is formed by part of the canal. The canal's restoration by this Trust will enable boat traffic passage by water between the Godalming Navigation at Shalford and the River Arun at Pallingham. The canal alongside DP is part of the 5-mile-long summit section to which boats climb, by a series of locks, the 60 feet in height from the Godalming Navigation and from which they drop 162 feet, through more locks, to the River Arun. The Trust is engaged on a £1.5m programme of work at Loxwood, 3 miles to the south of Dunsfold and aims next to restore a series of locks so as to reconnect with the summit level.

If DP's application is approved then the opinion of this Trust is that the development should benefit, rather than hinder, the restoration for navigation of the canal. For example, where the development includes new or rebuilt structures on or near the route of the canal, the marginal cost of providing for future navigation is likely to be modest, at least in comparison with subsequent rebuilding. Where major highways such as the A281 are concerned, there will be a clear benefit in minimising disruption by planning with canal restoration in mind. The Trust's opinion is that restoration of the canal in the vicinity of DP should be listed among those matters required under Section 106.

It seems to WACT trustees that it is in DP's interest to contribute under Section 106 to canal restoration in the vicinity of the site. A canal dredged to its design depth of 4'6" with a made-up towpath would be a more attractive adjunct to the proposed settlement than the present largely silted-up state with a towpath in poor repair and, in places, blocked by concrete bulldozed there after WWII. Thus the Trust is of the opinion that the whole mile long stretch from Tickners Heath northeastwards to, and including, the A281 crossing should be considered for planning

gains. This should therefore include Compasses Bridge and the crossing at Tickners Heath, where both lie just outside the area of DP's application. The application states baldly that "the Compasses bridge will be replaced by a new bridge" without the assurance given for the new access bridge, further northeastwards that it will "span clear across the canal".

There are two proposed structures which directly affect the canal – the new access bridge near the existing Farnhurst bridge and the roundabout on the A281. The bridge needs to have enough 'air draught' (ie clearance) so that boats can pass underneath without fouling their superstructure: this need is acknowledged in the application. The roundabout scheme, as drafted by Mott McDonald, appears to have been withdrawn by the applicant in a covering letter. If, when re-designed, it is positioned as shown in the accompanying illustrative sketch, it could be a significant planning gain. There would then be no necessity to lower the canal, involving the building of two new locks, to get the canal under the present alignment of the A281.

The Trust notes with regret that the water storage facilities on the DP site are much reduced from earlier versions of the scheme. These would have helped to keep the summit level topped-up in the drier summer months.

The Trust also notes that the application mentions the possibility of transporting timber by water from Chiddingfold Forest to the 3.5Mw CHP plant on site. The application implies that this must wait for the Trust to reach this stage of restoration but more positive help will be needed. Trust members' generosity will be taken up with rebuilding the seven locks between DP and Loxwood for many years yet. Each lock, at 2008 prices, costs about £230,000 even with volunteer labour.

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## **RSPB**

The RSPB welcomes consultation on the above proposals. The proposed development lies within 10km of the Wealden Heaths Special Protection Area. We believe due to the nature, scale and complexity of the application that the proposals should be screened for an Appropriate Assessment pursuant to Regulation 48 of The Conservation (Natural, & c.) Habitats Regulations 1994.

All further comments below relate specifically to the breeding bird interest of the proposal area identified during ecological surveys presented in the Environmental Statement and associated Appendices submitted with the application.

### *Woodland bird assemblage*

The RSPB is concerned that the proposed development could have an adverse effect on the populations of woodland specialist birds in the area. Woodland birds in the South East are in severe decline, the suite of woodland indicators species fell 19% between 1994 and 2006 in this region compared to a national decline of 7%, urgent action is needed to reverse this trend.

A number of specialist woodland birds recorded in the 2006 Breeding Bird Survey at Dunsfold Park (Appendix 11-5), such as lesser spotted woodpecker, nightingale, willow warbler (-65%), spotted flycatcher (-71%), turtle dove (-59%) and bullfinch (-36%) are priorities for conservation action. Given the severity of these declines, the local and regional importance of some of the species recorded we would welcome provisions within the consent for this application to retain and manage the wooded compartments that support these species

### *Farmland Bird Assemblage*

It is worth noting that the site also supports a number of farmland specialist bird species such as yellowhammer (-30%), linnet (-40%), reed bunting (-15%), skylark (-19%) and meadow pipit

(-25%). The recently published Wild Bird Indicator figures show that the South East Region farmland bird trend has reached a dramatic 21% decline against a national decline of 7%.

Again, we would welcome retaining some features that should support these species where practicable such as dense hedgerows next to grassy margins. Taking a pragmatic view it is likely that this suite of species will be displaced to nearby suitable habitat, which could be of equal or poorer quality. Ideally, we would like to see habitat features retained within the development for this suite of birds including the open habitat species such as skylark and meadow pipit we accept that the ability to provide suitable large open areas may be limited. Innovative approaches such as green roofs, if done on an appropriate scale for example within the industrial development, may mitigate against the loss of open habitat for some species.

#### *Urban Species of Conservation Concern*

The breeding bird survey data (Technical Appendix 11-5) also documents the presence of breeding starling, house sparrow and swallow. It may be possible to mitigate against some impacts on these species through measures being put in place within the development. These may be simple features such as nestboxes or appropriate location, design and management of greenspaces within the development.

#### *Species of European Importance*

The RSPB welcomes the identification of Schedule 1 species listed within the results of the breeding bird survey highlighting the additional protection they are afforded under the Wildlife and Countryside Act 1981 (as amended). In addition to this we would like to clarify that red kite are given further protection under a duty under Article 4 of the Birds Directive (79/409/EEC) as Annex 1 species they "shall be the subject of special conservation measures concerning their habitat, in order to ensure their survival and reproduction in their area of distribution". Although recorded as possibly foraging not breeding within the footprint of the proposals in 2006 we would seek clarification that this is still the case at the start of any permitted development in this area in order to ensure that this duty is upheld.

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**British Horse Society** - No comments received

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**Ramblers Association** - No comments received

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## APPLICANTS' PROPOSALS FOR A SECTION 106 AGREEMENT

The planning application is supported by a schedule of commitments on the part of DPL (Draft Heads of Terms, Volume 20). The Planning Obligation would contain commitments on the part of the developer to fund and/or provide land for a range of benefits including contributions to services to be provided by others, together with commitments on the part of the Councils to deliver the required facilities or services.

The planning gains secured by the Planning Obligation will be provided at trigger points in step with the pace of residential occupations. In this way the needs of the new community will be met as they arise.

Land will be reserved and set aside for the following land uses:

1. new areas of woodland and parkland extending over 143 hectares. These will be laid out, landscaped and made available for public use on a permissive basis.
2. wild life habitat creation;
3. market and affordable housing;
4. neighbouring employment;
5. new primary school;
6. open spaces, playing fields and a new pavilion;
7. canal basin;
8. transportation improvements;
9. the creation of a self-contained Village Centre including medical centre; village shops; a place of worship; site for two schools; a community centre incorporating resource centre.
10. crèche/pre-school provision;
11. combined heat and power facilities;
12. public art;
13. on-site waste recycling facilities
14. a site for displays and events e.g. a farmers market or country fair

Contributions will be payable either to the Council or the Community Trust for the maintenance and upkeep of various works and facilities both on and off site. These will include contributions towards the following:

- I. Learning - per dwelling contributions to be payable towards construction of new library facilities off-site or towards establishment of Resources Centre on-site.
- II. Secondary Schools - per dwelling contributions will be levied on every open market dwelling towards additional secondary school places in so far as justified and to the extent that the new population exceeds existing and planned increases in capacity of existing schools.
- III. Public Transport – as set out in the Transport Strategy – Volume 7
- IV. Local Highway Schemes - contribution to be payable towards alleviation of assessed problem areas in the locality with a view to improving highway safety and relieving congestion for both new and existing residents in the locality.
- V. Off-Site Footpaths and Cycleways - Contribution will be payable in instalments
- VI. Primary School On-site - a primary school is to be provided on site (subject to Education Act procedures). This will either be constructed by the developer or funded by developer contributions payable to the local education authority

### Village Centre Facilities

The following facilities will be constructed as part of the Village Centre:-

- Medical centre (subject to funding)
- Primary school

- A Community Centre incorporating a Resources Centre
- Aviation museum
- Village stores and shops
- Public House/Restaurant/Takeaway (2 x Class A3, 1x A4 and 1x A5 uses)

The phasing of the development of the above facilities is to be agreed. Other facilities may be provided in the village centre at the developer's discretion.

### **Facilities within the wider development**

The following facilities shall be constructed/laid out as part of the wider development:-

- On site/landscaping both strategic and ornamental
- A major new parkland/community woodland with permissive public access
- Playing fields and a new sports pavilion
- Informal amenity areas
- Local Areas of Play (LAPs), Local Equipped Areas of Play (LEAPs) and Neighbourhood Equipped Areas of Play (NEAPs)
- Public park
- A comprehensive network of footpaths/cycleways and bridleways on site designed to connect to existing footpaths/cycleways
- Woodlands and water features
- Allotments
- Habitat creation areas
- Public art
- A site for displays and events e.g. a farmers market or country fair

### **Management and Maintenance Obligations**

It is proposed that open spaces/playing fields and woodlands will be managed and maintained by the Developer in accordance with Planning Conditions pending hand over to Dunsfold Park Trust Company (a trust company to be established with specific facilities for managing the Dunsfold Park Estate)

Funding of the Trust will be secured through rent charge or service charge arrangements whereby the costs of maintenance are met by those with the greatest incentive to ensure the upkeep of the works and facilities (i.e. the residents and occupants of the new development).

### **Other Initiatives Integral to the Scheme**

A Co-ordinated Internal Transport Strategy

The internal transport strategy measures proposed as follows:

- Controlled Access Zone;
- Comprehensive pedestrian and cycle network;
- Cycle hire service;
- Parking restrictions and secure "parking barns";
- Community Neighbourhood Electric Vehicles;
- Local Bus Service integration;
- Neighbourhood electric Delivery Vehicles and Central Deliveries Centre;
- Transport 'Hub';
- Transport Coordinator;
- Social Networking Database for Dunsfold Park;
- Individualised Travel Marketing; and
- Travel Packs for new residents and employees

External Commuting, Shopping and Business Trips

It is proposed that the following measures are implemented to reduce the levels of car trips into and out of the site:

- Commuter and shopper bus services
- Electric vehicle promotion;

- Social network and car sharing database;
- Cycle & Walk links;
- Car User Charging;
- Workplace Travel Plans;
- Workplace parking levy;
- Introduction of a Transport Charging Scheme which encourages car sharing and use of public or green transport option and discourages use of fossil fuel car and high emission vehicles;
- Production of residential and commercial travel plans
- A Travel Plan Coordinator and travel planning steering group will be appointed to co-ordinate, monitor and manage the travel plans and other transport initiatives within the Community Building.

#### Measures relating to school trips

The following measures will assist with reducing and in some case eliminating the need for car borne school trips off site:

- Provision of a Primary and Special School on site
- Electric Vehicle promotion;
- Car sharing database;
- Cycle & Walk links; and
- Car User Charging.

#### Other Measures

- Establishment of a combined heat and power facility to serve the Development (with surpluses sold to the National Grid)
- Energy efficiency improvements to dwellings to contribute to achievement of Level 6 of Code for Sustainable Homes
- Introduction of sustainable drainage and waste water, and rainwater recycling where practicable.
- Establishment of a waste treatment plant on site, allied to household recycling.

#### Home Working

ICT connections - broadband connections will be available and connection points provided in all dwellings. The Resources Centre within the Community Building will include provisions for ICT and other support services to assist home working and smaller businesses.

#### Affordable Housing

37.8% of all dwellings (excluding sheltered/elderly and student accommodation) will be affordable. Affordable Housing will be delivered in step with pace of Open Market Dwellings It is currently proposed that Affordable Housing will be provided entirely without Housing Corporation grant. The mixed tenure and type of Affordable Dwellings is described in Chapter 6 of the Housing Strategy (Vol. 5) and Chapter 5 of the Planning Statement. The Affordable Housing will be privately funded but managed by a registered social landlord. The Affordable Dwellings to be provided will be the subject of reservation for an agreed priority period in relation to their first residential occupation for those with jobs in the locality. It is intended that there should be a strong connection between those living and working on the Development with priority being given to those with jobs, or the offer of jobs on site and in the wider Cranfold area.

Mortgagee protection and right to buy provisions are to be included. Affordable Housing is to be dispersed in several clusters throughout the development.