

**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 (1,035m2); A3 Restaurants/Cafes (230 m2); A4 Public House (115 m2); A5 Take Away (115 m2); B1a and B1b Business use including Offices and Research and Development (9,440 m2); B1c and B2 Light and General Industrial use (6,099 m2); B8 Storage and Distribution (7,624 m2); C1 Hotel (7,015 m2); D1 Non-Residential Institutions including health centre, two schools, place of worship, museum and community centre (9,906 m2); D2 Assembly and Leisure use including sports centre (2,185 m2); Monument; combined heat and power plant; together with associated works following demolition of 8, 029 m2 of existing buildings and removal of runways. Part full application for the Change of Use of 36,692 m2 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 : Alfold and Dunsfold  
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

**RECOMMENDATION Planning permission be REFUSED**

**EXECUTIVE SUMMARY**

**This report concerns a major proposal for a new settlement at Dunsfold Park. The applicant's aim is to create a balanced and integrated community in a mixed-use development. This builds on the existing industrial and commercial uses on the site that have temporary planning permission until April 2018.**

**This is a very significant development proposal where the principle of development, irrespective of its scale, does not accord with national Planning Policy Statements and Guidance, the draft South East Plan and policies of the Development Plan.**

**The report examines each of the material planning considerations and concludes that planning permission be refused.**

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## Preamble

Members received a Briefing Note in connection with the Technical Briefing meeting held on 3 September. That Briefing note is the basis of sections 1 to 9 of this report and appendices A - E. Where changes or additions have been made to those sections the relevant text has been underlined in this report. The amendments, to sections 8 and 9, reflect further representations received after the Technical Briefing Note was prepared.

The significant difference between this report and the Briefing Note is that this report provides the Head of Planning Services's planning assessment of the proposal as tested against the Development Plan, National Planning Policy and material planning considerations together with a recommendation to the Committee.

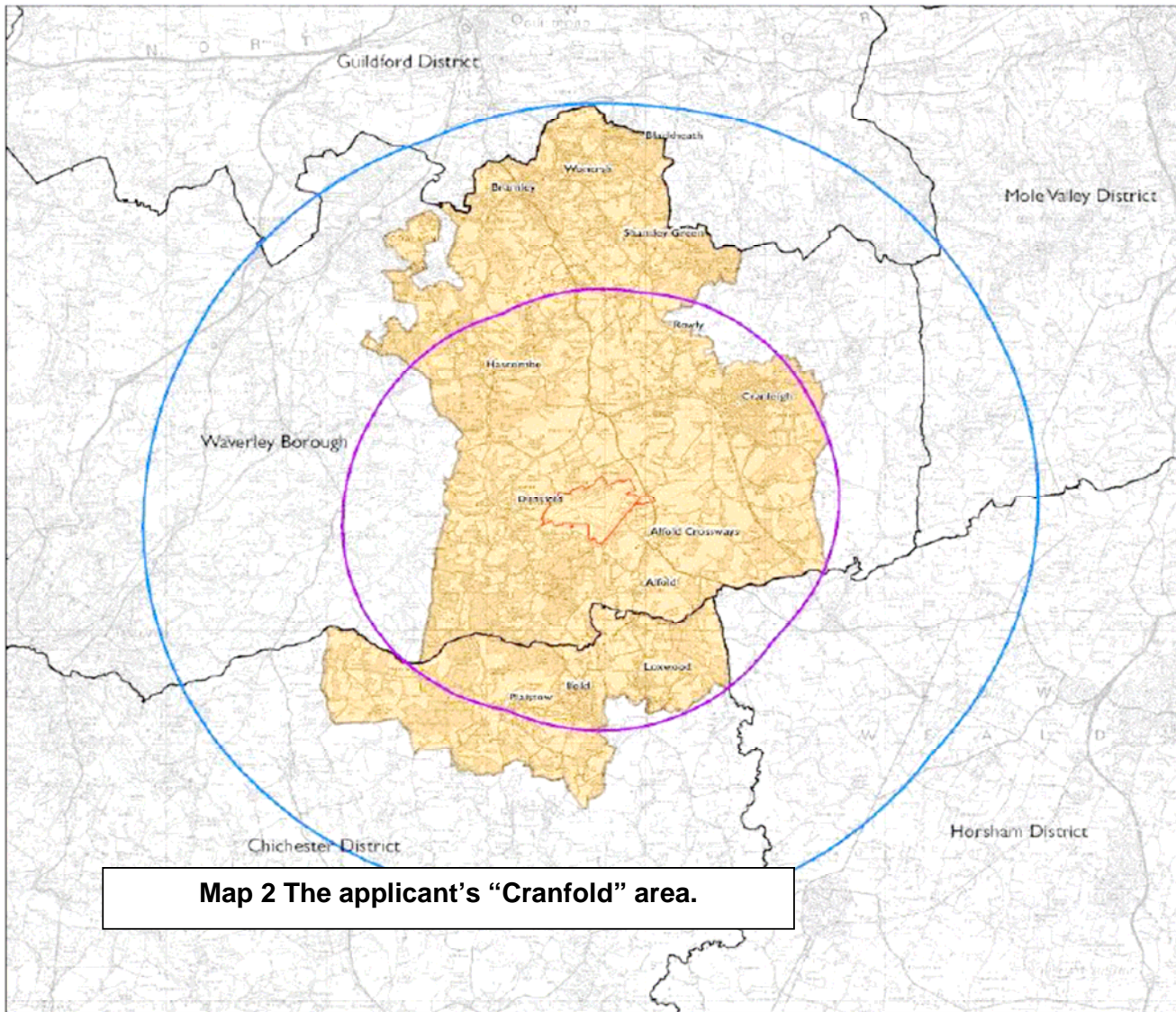
## 1.0 Background

- 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.



**Key**

-  Application site boundary
-  Cranfold boundary
- Settlement locations
-  5km from application site boundary
-  10km from application site boundary
-  District/borough boundary

Source: ONS

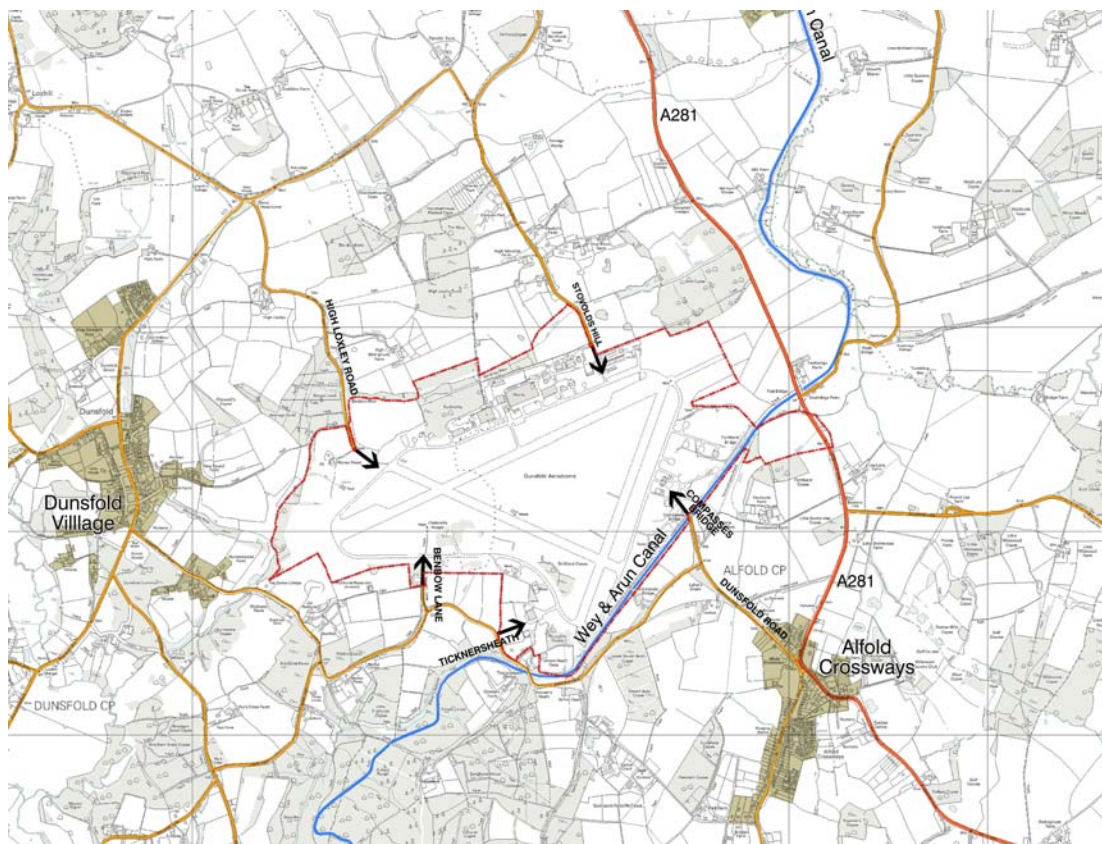
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## 2.0 Site Description

- 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 (11 miles to the north), Godalming (9.4 miles to the north), Cranleigh to the northeast (4.3 miles) and Horsham (11.3 miles) to the southeast.
- 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 Alford 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 unrestored route of 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 (Dunsfold 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 Dunsfold 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 Stovolds 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 "Dunsfold 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 have 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 (Of which Runway Park	23 8	9.3 3.2	Includes roads, public open spaces, School, Museum, Shops, Energy and Utilities Centre
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 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 m<sup>2</sup> 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 m<sup>2</sup> being demolished to remove buildings located outside the main industrial area and to remove obsolete premises;
  - This will leave 36,692 m<sup>2</sup> of existing space being retained in the long term.
  - Capacity within the existing industrial area will be used to add up to 15,247m<sup>2</sup> 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 m<sup>2</sup> 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 m<sup>2</sup> 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	836	38,692	48.0	815
Additional Floorspace (Industrial Area)				18,247	33.2	469
Additional Floorspace (Mixed-Use District)				7,915	20.0	395
Village Shops and Services						330 <sup>1</sup>
<b>TOTAL</b>	<b>44,721<sup>2</sup></b>	<b>66.5<sup>3</sup></b>	<b>836</b>	<b>59,654</b>	<b>N/A</b>	<b>2,000</b>

<sup>1</sup> See Appendix 5 for breakdown of employment in village shops and services;

<sup>2</sup> Does not include open storage;

<sup>3</sup> Does not include 432 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:

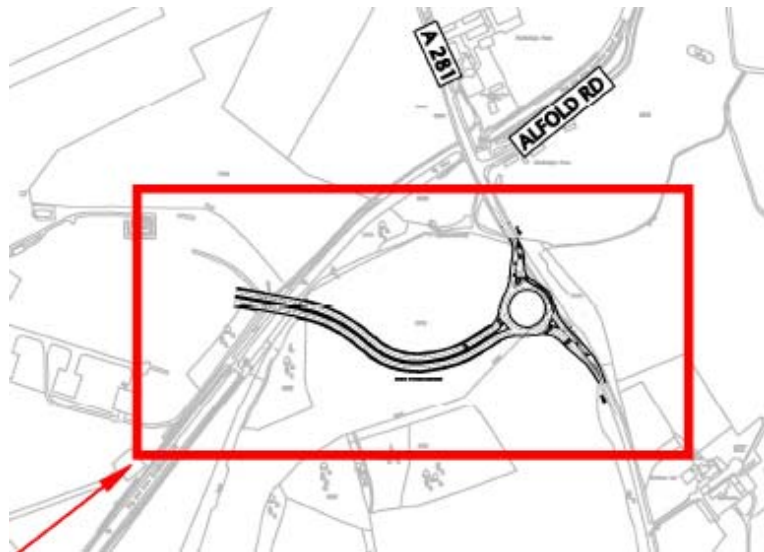
- Car Restrained Area;
- Comprehensive pedestrian and cycle network;
- Bicycles (and appropriate parking) provided with all households
- along with cycle hire service for visitors/employees;
- Parking restrictions and 'parking barns';
- Community Neighbourhood Electric Vehicles;
- Local Bus Service integration;
- 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 air force airfield. Planning permission was given in 1951 for the repair and flight testing of aircraft (HM/R4634). In 1958 planning permission was granted 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 2007 envisages that a Dunsfold Aerodrome Acton Area Plan will be drawn up 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 and west
- 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 E 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 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 stated 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 it meets 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 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** raised a number of issues that have been explored in meetings with the applicant. A further meeting is programmed and then final views will be submitted. The initial comments are on pages 102 – 105.
- 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** no comments received

- 8.12 **Waverley Borough Council Tree and Landscape Officer** raises no objection and comments that the extent of tree/hedgerow loss associated with the development 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** comments 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 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 northwestern 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 indicator 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 nest boxes 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 are 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 Panel examining the South East Plan rejected the site.
- 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 the Parish Council 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 are 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 gridlock 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 meritorious 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 Parish 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

#### 8.48 Wonersh Parish Council

The Parish Council has several reservations and one specific objection to the plan as presented. Their objection is to:

- the disappointing traffic plan that concentrates on three aspects over which the owners have direct influence or control: public transport, cycling and pedestrian ways. It is essential to address the limitations of the main north-south spinal arterial A281 on which there are regular bottlenecks with rush hour congestion at places like Shalford and Bramley. Drivers often divert to the B2128 after accidents or during bridge or road repairs. This has direct adverse impacts on Wonersh.

Their reservations concern:

- The impact on Health service provision.
- The scale of the proposed development.
- The adequacy of the road network to support the traffic generated especially in view of other development in the wider area.

The Parish like the environmental and ecological aspects of the application for this thermally efficient, sustainable development. It also offers an exciting prospect of meeting a large amount of local housing need, especially the substantial affordable home provision in an integrated settlement, where much of the employment would be adjacent to workers' homes and movement of commuters will be minimised. Without a single major development option such as Dunsfold Park, every settlement in the Borough would have to sacrifice valued land to development, much of which is agriculturally useful – in future food may not be as plentiful or readily available from abroad. In addition, the pressure on Cranleigh to expand faster may be reduced if this application was approved.

8.49 Hambledon PC strongly objects on the grounds that:

- Although not within the Green Belt/Surrey Hills AONB, it is adjacent to both and the proposed development would seriously impact on them, not only visually but also environmentally.
- No community is self-contained: the residents of Dunsfold Park would, like everyone else, wish – and be entitled – to exercise freedom of choice as to where they worked, shopped, educated their children, pursued their leisure activities. Therefore, despite the claim that the development would be “sustainable”, it would inevitably pose heavy burdens on an already over-loaded infrastructure – and especially roads, schools, medical and leisure facilities, all of which are currently over-stretched.
- Affordable housing is needed adjacent to the facilities that employ public sector workers. There is no point in housing them on a site from which they will have to travel long distances to work.
- The limited amount of development that has already occurred on the footprint of the former aerodrome is quite sufficient for a site of this nature and should be capped at the present level. That is marginally intrusive, mainly on noise grounds, it does not obtrude visually on the surrounding views and countryside and it provides a useful supply of accommodation for small local businesses.
- Develop the site further would permanently destroy an area of countryside whose villages sit comfortably within their rural environment.

## **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 motorcar.

#### 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 Open Spaces Society

Welcomes in principle the open space included in the application and the stated intention that access will be for the general public. They are concerned that access will be of a permissive nature and they object until the open spaces are guaranteed in perpetuity. They welcome the pedestrian and cycle routes within the settlement and the creation of paths and bridleways but wish these to be guaranteed in perpetuity. They consider that there should be improved links to Cranleigh, Alfold and Dunsfold for non-motorised traffic.

9.14 2.469 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 forever.
- 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.

9.15 321 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

9.16 80 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 couldn't 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.

9.17 Vol.19 is the applicant's Statement of Community Involvement concerning the lead up to the submission of the application.

## **10.0 Planning Considerations**

10.1 The starting point for the determination of any application is the Development Plan (Structure and Local Plan). Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application for planning permission be determined in accordance with the relevant policies in the Plan, unless material considerations indicate otherwise. Material considerations include national and regional planning guidance.

### National and Regional Planning Context

10.2 *RPG 9*, updated in July 2004, sets out the *Regional Planning Guidance for the South East* and will in due course be replaced by the *South East Plan (SEP)*.

The RPG states the commitment to sustainable development and the emphasis on concentrating development in places well served by public transport, especially town centres, within urban areas and on previously developed sites, before the option of developing on greenfield sites. These are also key development principles alongside the pattern of development being less dispersed with more sustainable patterns of activity, allowing home, work, leisure, green spaces, cultural facilities and community services to be in closer proximity and the more sustainable use of natural resources.

- 10.3 *RPG 9* also seeks to secure a multi-purpose countryside where the quality and character of the rural environment should be maintained while securing necessary change to meet the economic and social needs of local people and visitors. Rural communities should be sustained.
- 10.4 *PPS1* sets out the Government's commitment to sustainable development and the protection and enhancement of the environment. These aims are carried through in subsequent PPSs and PPGs (particularly *PPS/PPG 1, 3, 7, 9 and 13*). The key Government objectives in *PPS3* are to provide a wider housing opportunity and choice and better mix in the size, type and location of housing and create mixed communities; provide sufficient housing land giving priority to re-using previously developed land and create more sustainable patterns of development exploiting accessibility by public transport. The issue of whether Dunsfold Aerodrome is "previously developed land" is addressed in paragraphs 10.36 – 38 below.
- 10.5 *PPS1* starts by saying that good planning should ensure that "*we get the right development in the right place and at the right time*". It goes on, in paragraph 13, to cite the key principles of ensuring that planning decisions contribute to the delivery of sustainable development; one of which being the need to address the causes and impacts of climate change, for instance by encouraging patterns of development that would reduce the need to travel by private car.
- 10.6 The *Supplement to PPS1 on Climate Change* makes it very clear that developments should in future deliver patterns of urban growth that help secure the fullest possible use of sustainable transport for moving freight, public transport, cycling and walking and, overall, reduce the need to travel, especially by car. In identifying land for development there should be, or there should be a potential for, a realistic choice of access by means other than the private car.
- 10.7. In dealing with housing sites, paragraph 37 of *PPS3* follows the same approach, advocating that new developments should be in locations with good public transport accessibility, and accessible by using modes of transport other than the private car. 60% of new housing should be on previously developed land. *PPS7* also calls for new developments to be in locations where facilities can be served by public transport, and *PPG13* states the key planning objective that jobs, shopping, leisure facilities, and services should be accessible by public transport, walking and cycling.

- 10.8 Government policy for transport, *PPG13*, is to develop in sustainable transport locations and reduce the reliance on the private car. *PPS7* sets out the government's aims for rural areas and encourages new development in sustainable locations and where services and facilities exist. Protecting and enhancing the natural environment is a key aim of *PPS1 and 7* and conserving, enhancing and restoring wildlife habitats is an important consideration in *PPS9* and its recently published companion guide. PPS and PPG advice is that protection and enhancement of the countryside or environment is a central objective. Protection by itself is not necessarily enough and there could be cases where enhancement may be a very significant factor.
- 10.9 The *draft SEP* emphasises that national and regional guidance seeks to provide more sustainable patterns of development, based on higher densities and a sequential approach. It states that the efficient use of previously developed land and buildings within urban areas will be the first step in providing for the South East's housing needs. *SEP policy CC1* sets objectives for, inter alia, living within environmental limits.
- 10.10 There are now three "versions" of the *SEP*; the draft, the Panel's recommendations and the Secretary of State's proposed changes. All are material planning considerations. For the purpose of this assessment the draft plan policy numbers are used (appendix C sets out the SoS's proposed changes and where policy numbers might change).
- 10.11 Draft *SEP policy CC8a* envisages the prime focus for development to be within urban areas. *Policy H3* requires that at least 60% of all new housing development in the South East should be on previously developed land and *policy H1* proposed an annual average of 230 dwellings per annum (dpa) in Waverley, though the SOS proposes an increase to 250 dpa. Amongst other things, *Policy C3* aims to protect the countryside for its distinctive qualities.
- 10.12 *Policy H2* of the draft *SEP* states that local authorities will prepare housing allocation strategies, phasing the development of large sites and the provision of infrastructure to ensure that overall housing allocations can be met. A key factor in the delivery of additional housing is the provision of necessary infrastructure to support this. Draft *SEP policy CC5* relating to infrastructure states that the scale and pace of land release for new development will be dependent on there being sufficient capacity in existing infrastructure to meet the area's current needs and will be related to the provision of new transport and other infrastructure to meet the needs of new development.
- 10.13 The *SEP* housing allocations remain unconfirmed but the SOS's proposed modifications are a clear guide to the likely final position. It can thus reasonably be concluded that there are no known current or future intentions to allocate a significant quota of new dwellings in the Borough that will require new settlements in the countryside. In due course the *SEP* will become the *Regional Spatial Strategy (RSS)* and will replace the Structure Plan and cover the plan period up to 2026.

- 10.14 The applicant addressed the national and regional planning policies in the accompanying Planning Statement (vol. 1 of supporting documents). That acknowledges the planning policy position and goes on to argue the case for an exception to those policies on the basis that:

*“Waverley BC has been considering the future of the Aerodrome since the closure of their operations by BAe in 2000. No proposals or policies for the site have been produced. Whilst the current proposals therefore do not comply with development plan policies for the location of development, those policies are increasingly out of date and there are several compelling material considerations which, in accordance with s.38 (6) of the Planning and Compulsory Purchase Act 2004, justify the proposals contained in this application.*

*Non-compliance with development plan policies to focus development mostly within existing urban areas is outweighed by the greater focus now being placed on new settlements, by recognition of clusters of settlements as a means of achieving sustainable development, by the inheritance of a brownfield site and the employment potential it offers and by the ability of Dunsfold Park Ltd, who are committed to create an exemplar of sustainable development, to deliver all the benefits set out in this statement.*

*The application is put forward for positive consideration at this time because there is a substantial shortfall in the supply of land for housing in Waverley (and adjoining Boroughs) in the coming decade according to the test set out in PPS3 Housing. Furthermore, the substantial and wide-ranging benefits of the proposals outweigh any conflict with development plan policies on the location of development.”*

- 10.15 Although the applicant's representations in respect of the *SEP* did not lead to provision or allocation being made for Dunsfold in the *SEP* this does not automatically mean the proposal is unacceptable or lacking in merit. Indeed the applicant has pointed out that the Panel Report on the draft *SEP* does not reflect the case that was put to the Panel, which was that the plan 'did not have any planning policy basis for clusters of settlements as a means of achieving sustainable development'.
- 10.16 Similarly the applicant's bid for Eco Town status was not accepted but this does not necessarily mean that the proposal is without some merit especially when the basis of the new settlement is founded on sustainable development principles and the application of the latest technology in the fields of energy generation/consumption, waste disposal and treatment.
- 10.17 However when the principle of a new settlement is judged against national and regional planning policy and guidance the proposal is in clear conflict therewith. This is neither the right place nor the right time. This conflict is recognised in the responses of SEERA, SEEDA and SCC. Setting aside the historic legacy of the Second World War and other material planning

considerations, development of this scale, in the countryside and unrelated to an existing urban settlement cannot be reconciled with such policies and guidance. The only grounds for favourably considering the proposal would be if other material planning considerations provide justification for departing from policy and guidance. In the context of a proposed exception to policy there must be over-riding benefits where the weight to be attached to the breach of policy must relate to the harm actually caused by the proposal to the objectives of the policies in question.

Conclusion: National and Regional Planning Context

The application conflicts with National and Regional planning policy and guidance since this is a location where development of this scale is not provided for. There would have to be exceptional planning reasons to justify a development of this nature in this countryside location.

Development Plan principles

- 10.18 The application site does not have the highest level of planning restraint or national landscape designation (e.g. Green Belt and AONB) but it is, nevertheless, in an isolated rural location where development would not normally be permitted. There would have to be exceptional planning reasons to justify a development of this nature in this countryside location.
- 10.19 The applicant has addressed the County and Borough planning policies in the accompanying Planning Statement (vol. 1) and examined a number of options in so far as providing 2,601 homes is concerned (vols. 17 & 18). The Planning Statement acknowledges the planning policy position and goes on to argue the case for an exception to those policies on the basis that:
- A development of 2,601 dwellings at Dunsfold Park compares well with the continuation of present policies of focusing development within the existing urban areas of Waverley.
  - The four Waverley towns option performed relatively poorly primarily because small scale and incremental development would not be able to bring the infrastructure, affordable housing, employment opportunities and community facilities and services that a larger scale development could bring.
  - Incremental development could place further pressure on existing services and facilities in the four towns, and on their special character.
  - Dunsfold Park also performed well against an urban extension to Cranleigh and an urban extension to Guildford.
  - Incremental development changes the character of communities.
  - There is an inability to mitigate efficiently, or even at all, the cumulative impacts of a series of smaller developments in different parts of the urban areas; even if contributions are collected through Section 106 agreements (and it is often not worthwhile to negotiate such agreements), it is not practical to provide additional infrastructure



(e.g. school capacity, public services such as libraries, improved roads) to serve such scattered developments.

- Affordable housing is frequently not provided in spite of the Local Plan requirement because the schemes fall below the size threshold or because exceptional costs make the provision unviable.
- There is little or no scope to provide the wide range of housing tenures and types, which will offer choices and social mobility at Dunsfold Park.
- The economies of scale to justify innovative measures to address climate change are not available, for example the sourcing of energy from renewable sources and the use of charging to discourage car use.

10.20 The applicant has also submitted a sustainability appraisal of alternative locations (vol. 17) for development that meets housing need and demand in the local market area. Four options were considered namely:

- Development of 2,600 dwellings within the existing urban areas of Cranleigh, Godalming, Haslemere and Farnham.
- an urban extension at Guildford incorporating 2,600 dwellings.
- an urban extension of 2,600 dwellings to the south-west of the existing settlement of Cranleigh
- Dunsfold Park

10.21 The applicant considers a new settlement at Dunsfold Park to be a more sustainable solution to the Borough's housing need and would that it provide the opportunity for the Council to resist more of the damaging town cramming development proposals (see vols.1 & 17). It is accepted that in some circumstances a new settlement can be a more efficient form of development compared to numerous urban area redevelopment and greenfield developments but there are no grounds to consider that a new settlement would provide the Council with the opportunity to resist windfall development in existing settlements.

10.22 In County and Borough planning policy terms the site lies in the countryside beyond the Green Belt. The emphasis of the spatial strategy of the Structure Plan remains the achievement of sustainable development. The Borough Local Plan also has the same approach. The locational policies in the Development Plan are consistent with the emerging *RSS*. Policies in both plans 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. The policy basis is *SSP policies LO1 & LO4 and WBLP policies C2 & M1*.

10.23 In the countryside beyond the Green Belt new development, except for an essential agricultural purpose, would not usually be permitted since it should be located in or near to settlements (*SSP policies LO1 & LO4, WBLP policies C2 & C3*). The test of "very exceptional circumstances" applicable to development within the Green Belt does not apply. Based on *RPG9* and the *SEP* there is no pressing need to consider releasing additional land for housing above existing and future commitments (*SSP policy LO6*).

- 10.24 The applicants maintain that the character of the countryside at Dunsfold has already been changed dramatically by the development of the aerodrome and its subsequent history and *WBLP policy C2* is not seen as imposing a serious constraint on the strictly controlled development that is proposed. This point of view is not shared. Indeed in recent appeal decisions at Dunsfold Park Inspectors have concluded that the site lies in the countryside and is “*subject to relevant countryside policies and guidance*” (APP/R3650/A/07/2039742, APP/R3650/A/07/2058215 and APP/R3650/A/08/2063812/NWF)
- 10.25 The proposals for a new settlement at Dunsfold Park do not support the role of established towns, are in a relatively isolated rural location, do not conform to the locational and sustainability principles of the spatial strategy of the *SSP*, or show compliance with the emerging *SEP*. The applicant's approach to the transport issues is dealt with in the Transportation section in paragraphs 10.56 – 71 below. The new settlement is clearly contrary to Structure and Local Plan location of development policies and this lies at the heart of the consultation responses from SCC and WBC Planning Policy section
- 10.26 Although the site is registered with the International Civil Aviation organisation as an aerodrome, and is colloquially referred to as "Dunsfold Aerodrome", the activities that may take place on the site are constrained by the relevant planning permissions. The permanent planning permission is for the erection, repair and flight-testing of aircraft. Temporary planning permissions allow for the site to be used until 1<sup>st</sup> April 2018 for B1 (office/light industrial), B2 (general industrial), B8 (warehouse distribution) including outdoor storage and ancillary uses together with air flight capability ancillary to those uses. The commercial uses are based in approximately 45,000m<sup>2</sup> of buildings with some 61,000m<sup>2</sup> of open storage. 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. The permanent planning permission and the temporary uses make use of the legacy of the Second World War and but for this accident of history it is highly unlikely that an industrial use of this magnitude would have been permitted in this location.
- 10.27 Nevertheless the existence of a substantial commercial presence at Dunsfold Park is a material consideration. One of the principles of the new settlement is to build on the existing and future employment potential offered by the site and provide a sustainable development, in social, economic and environmental terms. In the applicant's view this supports their concept of “Cranfold” as a self- contained entity and supports the economic development of the wider region. Whilst the notion of facilitating the self-containment of rural areas is a desirable principle it is usually achieved through focussing on adding development to existing settlements and thus improving facilities for existing residents and building on existing infrastructure and communities. Despite the applicant's “Cranfold” concept it is considered that the proposed new settlement will do little to enhance existing settlements and communities since it will compete with smaller settlements and add to the congestion problems in Cranleigh village centre. For these reasons the proposal cannot be reconciled with *SSP policy LO5 and WBLP policy RD1*.

- 10.28 In general infrastructure terms access to the site would meet the requirements of the Highways Authority. Water supply would have to be upgraded to serve the site. All other essential utility service requirements would be met on-site. The County Council have confirmed that they would require a financial contribution towards meeting the secondary education needs.
- 10.29 The proposal includes the essential on-site infrastructure and community facilities to support a new settlement with a population in the region of 6,000 persons. For this reason it is considered that those issues would be satisfactorily addressed and there would be no conflict with *SPP policies DN1, DN12 & DN13 and WBLP policies D13, H10 & CF2*.
- 10.30 It is considered that the proposals for a new settlement conflict with the spatial strategy of the *SSP* and *WBLP*, which envisages most development to be sustainably located and/or achieved through the regeneration of urban areas. It is also a policy requirement that development should 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.

Conclusion: Development Plan principles

The proposal cannot be reconciled with countryside and locational policies. Infrastructure and other general policy issues are capable of being resolved and would not give rise to objection. The key issue is whether other material planning considerations outweigh the conflict with Development Plan principles since without exceptional justification the proposal should be refused as being contrary to County and Local planning policy.

Location and accessibility

- 10.31 In dealing with housing sites *PPS3* follows the approach of advocating that new development should be in locations with good public transport accessibility, and be accessible by using modes of transport other than the private car. *PPS7* also calls for new development to be in locations where facilities can be served by public transport, and *PPG13* states a key planning objective that jobs, shopping, leisure facilities, and services should be accessible by public transport, walking and cycling. The above is underpinned by *PPS1* and the requirement that good planning should ensure that “*we get the right development in the right place and at the right time*”.
- 10.32 The proposal is for a new settlement within the countryside. It takes as its foundation the current commercial and industrial development at Dunsfold Park. This would provide employment opportunities for residents as well as providing homes for existing employees based at Dunsfold Park who could chose to live locally, if they do not already do so. There is some merit in the principle of matching housing and employment but this should not ignore location and accessibility principles. In any event the proposal is not for a

completely self-contained settlement and future residents would still be dependent on nearby settlements for higher order facilities such as secondary schooling, shopping and access to the national rail network.

- 10.33 Currently the commercial and industrial uses at Dunsfold Park are the subject of a temporary planning permission until April 2018 but the lawful use of the site for the production, repair and flight-testing of aircraft remains in tact. Given the lawful and temporary uses it would not be unreasonable to conclude that the present extent of the site used for commercial use is likely to continue indefinitely. That being the case Dunsfold Park represents a very significant employment site with the potential to employ up to 1,000 persons (currently 638 but with some buildings are vacant and others under-used). However the fact remains that a new settlement at Dunsfold Park would be a major intrusion of development within the countryside.
- 10.34 National policy is clearly to locate development in sustainable locations. Dunsfold Park does not sit comfortably with the aim that development is located where it has good public transport accessibility. Such accessibility has to be provided, at the developer's expense, but also at the expense of locating the quantum of 2,600 houses within or adjacent to existing urban areas. The possible dilution of public transport services at the potential expense of the opportunity to increase custom on established public transport services in urban areas would be at variance with the aims of *PPG13*.
- 10.35 The existence of Dunsfold Park is something of an aberration in that but for the expediency of the Second World War it almost certainly wouldn't exist today. However it does exist and the Council has indicated in the *WBLP* that supplementary planning guidance would be prepared and the withdrawn Local Development Scheme 2005 (LDS) stated that the future of the site would be the subject of an Action Area Plan addressing "redevelopment opportunities on the site in a coordinated and comprehensive manner and to provide development proposals which make full use of economic and social benefits and safeguard the ecological, environmental and infrastructure resources". Neither the *WBLP* nor the LDS give any indication that development of a substantial scale is contemplated. Indeed such an option would be at variance with the then Development Plan and the future *RSS*.
- 10.36 In terms of national planning guidance there is an issue of the status of the aerodrome as previously developed land (PDL). The accompanying Planning Statement makes reference to the applicant's view that the proposal is for the development of "previously developed land". Objectors have taken issue with the applicant's view. PDL is defined in *PPS3* as being:  
*"Land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure."*
- The applicant's maintain that the Council has accepted that the whole of the aerodrome is PDL. This is based on a previous Council statement (the withdrawn Local Development Scheme 2005) and a planning application report (WA/2006/1280). It is claimed that the reference to Dunsfold Aerodrome as a major developed site and the acceptance that the curtilage of

the aerodrome includes the footprint of the buildings and runways and the grassed areas between the runways establishes the Council's view that the aerodrome is PDL.

- 10.37 It is considered that the Council has not accepted that the aerodrome constitutes PDL despite the construction the applicant puts on various Council documents. The question of whether airfields are PDL was posed in an petition to the Prime Minister (<http://www.number10.gov.uk/Page11194>) seeking clarification of PPS3. The response given was as follows:

*“There has been a common misunderstanding about the status of airfields in Planning Policy Guidance 3 (PPG3). Airfields were not exempted from the definition of previously developed land. Previously developed land includes the permanent structures and the curtilage of a site. Planning Policy Statement 3 (PPS3) reaffirms this position.*

*However, PPG3 stated that where the proportion of open land on previously developed sites (the curtilage) was large, then it would not normally be appropriate to develop these sites to the boundary. It used airfields as an example, but this was never an exemption.*

*PPS3 continues this approach. It states that there is no presumption that previously-developed land is necessarily suitable for housing development. Nor is there any presumption that the whole of the curtilage should be developed.*

*This applies to airfields as to all other land uses. It is up to local authorities to decide these issues on a case by case basis.*

*The extent to which a site is defined as being previously developed land will depend on the particular circumstances of the site. For example, in the case of a large site with few structures, some parts of the site might be classed as previously developed, and others as greenfield”..*

- 10.38 In other words aerodromes or airfields are capable of being considered PDL but the actual extent of PDL will depend upon the circumstances of the site. It is considered that the term “previously developed land” properly describes the areas of the site in business use and the main runway but not the grassed areas. On this basis it is not accepted that the proposal in its entirety represents the development of PDL. Even if Dunsfold Park were to be regarded as PDL it would be entirely the wrong location in which to locate a development of this scale and nature.

- 10.39 The location of new development is a key issue for the Borough's LDF Core Strategy and any consideration of such a substantial development proposal such as this should be undertaken on a Borough wide basis and within the LDF process. Such a major development should not be considered in isolation with the risk that it predetermines Borough wide strategy. To do so would be contrary Government advice on sound plan making and planning policy formulation.

10.40 The consultation responses from SEERA, SEEDA, CAGE and local authorities all point to the poor location of the site in which to establish a self contained settlement and the conflict with existing and proposed sustainable development policies. Whilst the application includes significant transport proposals to address the locational drawbacks it nevertheless remains a fact that the settlement would not be of a size and scale to be self contained and residents and businesses would still have to call on services and facilities in other nearby and distant settlements. The lack of a local rail service would mean that any travel to work beyond the immediate area to be served by bus services would almost certainly be private car. The provision of a biofuel filling station, electric car points and imaginative car charging could reduce greenhouse gas emissions but the same could equally be said about extensions to existing urban centres that already have the services and facilities and established public transport provision.

10.41 The proposal is well researched and presented. It represents a substantial commitment by the applicants to embrace sustainable development ideals but the commitment and the aims do not overcome the location deficiencies. In the words of PPS1 the development would not be “*in the right place*”.

Conclusion: Location and accessibility

The proposed new settlement would conflict with national, regional and local planning policy regarding the sustainable, accessible location of development. In addition the scale of development would have Borough wide planning policy implications that should more properly be considered in the Local Development Framework process.

Housing considerations

10.42 The development proposes 2,601 houses and flats (comprising 2,405 Use Class C3 dwellings and 196 C2 units in residential institutions - 46 for students and 150 for elderly residents) to provide greater opportunities for people to live and work locally, either in Dunsfold Park or the wider surrounding rural area of Cranfold. There would be 910 affordable dwellings representing 37.8% of the total excluding warden, extra care accommodation for the elderly, and student housing (35% of the total number of dwellings). It is estimated that, in total, housing at Dunsfold Park across all tenures will accommodate some 6,094 people. The gross density of the housing is expected to be 32.5 dwellings per hectare and the net density 45.6 dph. The Design and Access Statement, vol.2, describes the master planning proposed design criteria for the new settlement.

10.43 The applicants carried out a detailed analysis of housing land supply (Housing Land Supply Assessment vol. 6). They maintain that in Waverley Borough there would be a shortfall of 355 to 375 dwellings in 2007 –2012, increasing to a shortfall of 990 to 1,120 dwellings in 2012 – 2017 with a cumulative deficit of 1,345 to 1,495 dwellings in the ten-year period. They also examine potential housing numbers in Guildford Borough; Horsham, Mole Valley and Chichester

Districts and point to a potential shortfall in all five local authorities of 9,244 to 11,524 dwellings to 2017. A shortage of affordable homes is also identified.

10.44 The applicant's Housing Strategy (vol.5) is founded on their findings for a local market area (LMA) that extends about fifteen miles around Dunsfold Park (including all of Waverley and Guildford Boroughs and parts of Mole Valley, Horsham, Chichester and East Hampshire). The applicants identify problems related to both an overall shortfall of housing and to a mismatch between the housing that is needed and that which tends to be supplied in the LMA including:

- Shortages of open market housing, lead to very high price: income ratios.
- Shortages of social rented housing.
- Shortages of intermediate housing some of which could release social housing for other households with lesser ability to pay.
- shortages of smaller housing, to provide for increasing numbers of smaller households, including retired households, to release larger, family accommodation.

They also examine the travel to work patterns of employees within "Cranfold"

10.45 The applicant's housing offer is summarised as being

- To create a mixed and balanced community.
- To promote sustainable living and development by
  - reducing home to work travel distances;
  - utilising modern methods of construction; and
  - incorporating and encouraging the use of 'green' technologies in the housing provision.
- To address the shortfall in the supply of open market and affordable housing in the local housing market.

This is based on addressing seven market segments as follows:

1. Open market sale
2. Open market rented
3. Discounted market rent
4. Shared ownership
5. Elderly sheltered / Extra care accommodation
6. Student accommodation
7. Social rented (including temporary to permanent accommodation)

10.46 *SSP policy LO6* allocates 2,810 new dwellings in the period 2001 to 2016. Of that figure 1,113 had been built between 2001 and 2006, above the average required in the Housing trajectory figures. A further 439 dwellings were completed in 2006/7. *SEP policy H1*, Panel recommendation and SoS changes, propose 5,000 new homes in the Borough in the period 2006 to 2026 (250 per year). The new settlement proposal thus represents 53% of the *SEP* housing allocation in the Borough to 2026. The *SEP* housing allocation is a minimum figure where it would be expected that at least 60% of new housing would be achieved through the development of previously developed land ("brownfield" land). As noted above it is not accepted that the new settlement constitutes the development of PDL although there is a case for acknowledging that some of the proposed residential development might be.

- 10.47 Irrespective of the PDL issue the proposal constitutes a significant housing development that will represent a departure at a local level from the national target of keeping “greenfield” housing development to no more than 40%.
- 10.48 The SEP housing allocation is a minimum figure and is based on an average of 250 dwellings being completed each year from 2006 to 2026. If permission was granted for the new settlement the applicants envisage that it would be developed over a twelve-year period with an average of 230 dwellings for each of the first ten years. This would leave 20 dwellings per annum to be completed elsewhere in the Borough to meet the minimum target.
- 10.49 In simple terms the development of Dunsfold Park would not be instead of development elsewhere in the Borough, except perhaps where new “greenfield” sites might be concerned. In practice any proposed residential development within settlement policy boundaries and urban areas would have to be granted planning permission where it complied with national and local planning policy. The fact that the average house building figure would be exceeded would not be grounds for refusal.
- 10.50 The proposals for affordable housing include setting up a Trust to develop and own them, engaging a Housing Association (RSL) to manage them in accord with social housing principles. The fact that the affordable homes would not be provided by an RSL is not a planning issue provided that they are managed and allocated in accordance with the Council’s affordable housing policy. The provision for affordable housing accords with *SEP policy H4* but falls short of *SSP policy DN11* figure of 40%. The affordable housing policies in the WBLP do not apply directly since they concern developments within existing settlements (policy H5) or rural exceptions sites (policy H6).
- 10.51 The net site density accords with *SEP H5 and WBLP H4*. Similarly as far as type & size of market price and affordable homes are concerned there would be no conflict with *SEP policy H6* and *SSP policy DN10*. In terms of *WBLP policy H4* the proposal would provide 50% of the new development as 1 and 2 bedroom units, and a further 20% as 3 bedroom dwellings. The remaining 30% would be 4 or 5 bedroom dwellings. There is therefore conflict with *WBLP policy H4* in that 80% of dwellings should be of 3 bedrooms or less and only 70% are proposed. As the application is in outline it is not possible to ascertain how many of the 4 or 5 bedroom dwellings would exceed the 165m<sup>2</sup> floor area.
- 10.52 The proposal includes 150 units for the elderly and this would satisfy *WBLP policy H7* and the need to make provision for special needs housing.
- 10.53 The new dwellings would be located within a 2km walking distance of on-site services, facilities and employment in accordance with the advice in paragraph 75 of PPG13. This distance is also convenient for cyclists.
- 10.54 The housing proposals have been the subject of discussion between the applicants and the Council and the final comments of the Council’s Housing Development Manager area awaited. These will be reported verbally at the meeting but are unlikely to significantly alter the conclusion below.



- 10.55 The provision of a new settlement is not provided for in the current *SEP*, *SSP* and *WBLP* and development of this scale and in this location has implications for the future LDF. Housing provision is a key issue for planning but it should be undertaken on a Borough wide basis and the proposal represents a major development that should not be considered in isolation with the risk that it predetermines Borough wide strategy. To do so would be contrary Government advice on sound plan making and planning policy formulation. To use the words of PPS1 this would not be the right development “*at the right time*”. It is considered that, despite the applicant’s careful researched housing strategy, the proposal cannot be reconciled with locational planning policies.

Conclusion: Housing considerations

The locational drawbacks to a new settlement in this location outweigh any advantages that may arise in house building delivery. Furthermore the scale of development is such that it could undermine the housing strategy of the Local Development Framework.

Transportation

- 10.56 The application is accompanied by a Transport Assessment (vol. 8) with technical appendices prepared in accordance with national guidance and SSP policy DN2 and WBLP policy M2. It has been prepared in the context of the most recent guidance published in early 2007 by the DCLG and the Department for Transport. The application is also accompanied by a Transport Strategy (vol. 7) and Travel Plan (vol. 9) In accordance with *SSP policies DN2, 4 & 5* and *WBLP policies LT11, M2, 4, 5, 9, 10 & 13* consideration has been given to the accessibility of the site by alternative modes of travel to the private car with the likely impacts of additional vehicle movements on the locality and transport network.
- 10.57 The background to the transport proposals is explained in volumes 7 and 8, including a review of local transport infrastructure. The existing situation is described, and the various transport aspects of the development are discussed, including traffic flows, parking, land use and access, public transport and road safety. The applicants consider that they have taken account of committed developments in the locality and an assessment made of their relevance to the consideration of the proposals. Vol. 9 sets out the applicant’s Travel Plan for the development and this accords with the approach of *SEP policy T8*.
- 10.58 The primary vehicular access will be a new link road to the A281. This is in the form of a dual carriageway link road between the new settlement and a roundabout junction on the A281 just south of the junction of Alfold Lane with the A281. Secondary access would remain via Compass Gate with bus services using Stovolds Hill. It is understood that the Highways Authority has no objection in principle to the new access. Indeed such a new access on its own would address one of the shortcomings of the present uses at Dunsfold Park and the local concerns about goods vehicles and traffic flows via Stovolds Hill and Compass Gate.

10.59 The site is located within the countryside and is not currently served by public transport. The nearest railway stations are:

Portsmouth – London Waterloo

Witley	8 miles
Milford	8
Godalming	9
Guildford	10

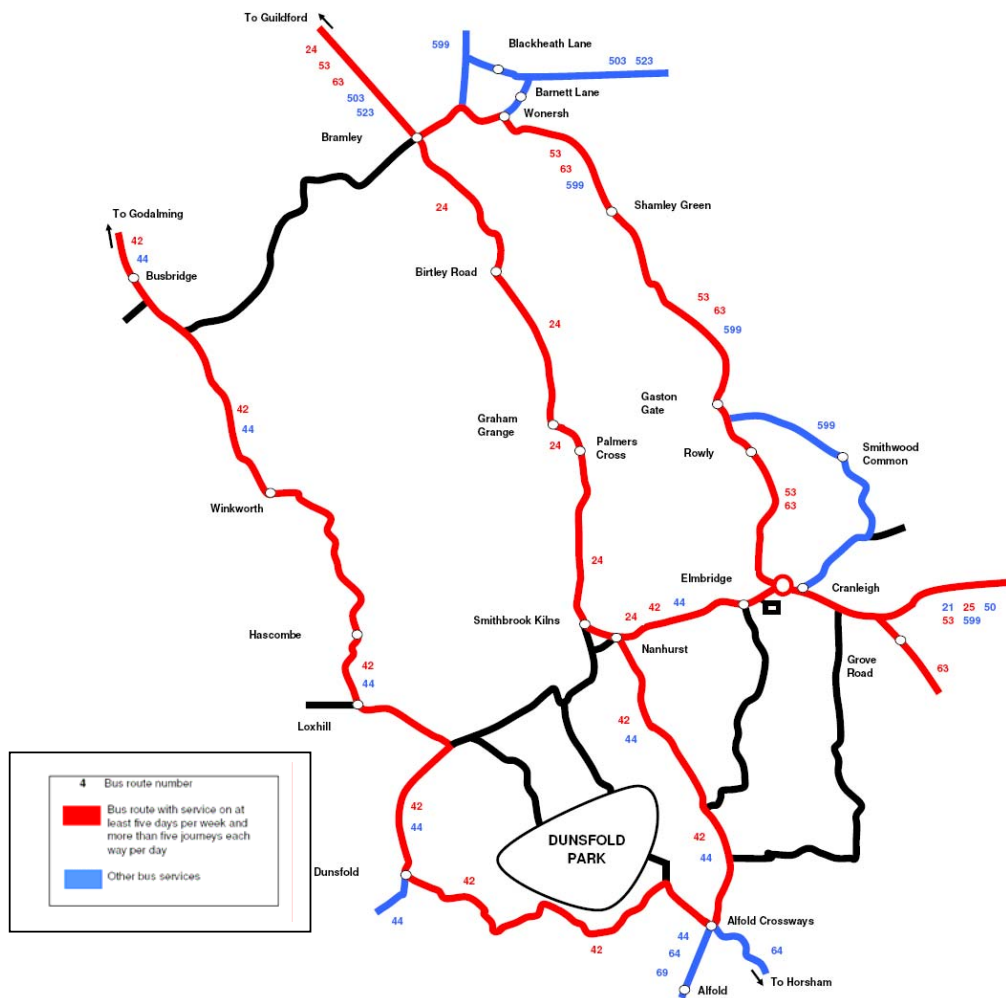
Sussex Coast – London Waterloo

Ockley	12 miles
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Sussex Coast – Gatwick – London Victoria

Christ's Hospital	11 miles
Horsham	12

Public bus services in the area are shown on the plan below.



10.60 The Transport Assessment sets out the background to the transport situation in the locality and a review of the highways context of the site and existing provision for travel by public transport, walking and cycling. Personal Injury Accident data was also analysed. The applicant's land use and transport

strategy is based on a structured series of measures to reduce demand and provide sustainable forms of transport for the journeys that need to be made:

- a land use mix of housing, jobs and services that reduces the need to travel, including incentives;
- a degree of self-containment within Dunsfold Park and a further degree of self-containment based on the extensive services and jobs in Cranleigh.
- Deterrents to the use of the car for journeys for which attractive and efficient alternatives exist or will be supported by Dunsfold Park Ltd including new bus services.
- Provision of alternatives for journeys that lend themselves to environmentally friendly, shared transport.
- Use of zero carbon alternatives to the car for journeys that need to be made by individual transport.
- A network of alternatives to the car that will be of benefit to Cranfold residents as well as Dunsfold Park residents, reducing the need to travel by car in the wider Cranfold community.

10.61 The Master Plan is designed to reduce the need to travel and to encourage movement on foot or by bicycle:

- close juxtaposition of the residential and employment areas with the village centre readily accessible to each;
- measures to facilitate working at home;
- compact layout and relatively high density (33 dph gross);
- creation of safe and attractive pedestrian environments within the village through: controlled access for vehicles in the inner residential area and village centre, layouts that encourage slow driving, separate access for the vehicles serving the commercial area,
- priority in the allocation of housing firstly to those working at Dunsfold Park and secondly to those working in Cranfold;
- development and pricing of affordable housing to be available to those working in business and services in Dunsfold Park and Cranfold; and
- routing of the buses serving external destinations such that residents and employees are within 300m of a stop.

10.62 The applicants consider that the Transport Strategy has been designed to provide sustainable and attractive alternatives to the car for different trip purposes, to the key destinations at appropriate times of the day. The aim of the internal transport strategy is for all internal trips by employees and residents to be by alternative, non-fossil fuel car mode where possible. The measures proposed are as follows:

- Controlled Access Zone encompassing the inner part of the village and the village centre;
- Comprehensive pedestrian and cycle network;
- Bicycle rental scheme;
- Parking restrictions and 'parking barns';
- Promotion of community neighbourhood electric vehicles for use by residents and employees;

- Local bus service integration to enable bus use for internal trips
- Neighbourhood electric delivery vehicles and central deliveries centre;
- Transport 'hub' for information and transport connections;
- Transport coordinator;
- Social networking database for Dunsfold Park; and
- Individualised travel marketing.

10.63 The external transport strategy addresses principally the need to provide good access by sustainable means to Cranleigh, Guildford, Godalming and Horsham, with connections to local villages, for work, shopping, leisure and other purposes. The measures proposed are:

- Commuter bus services, with additional services for shoppers and demand responsive services, and "yellow" buses for school journeys;
- Electric and bio-fuel vehicle promotion;
- Social network and car sharing database; Car club
- Cycle & walk links;
- Car user charging: an exit charge on vehicles leaving the site, varied by emissions and time of day;
- Workplace travel plans; and
- Workplace parking levy, also varied by emissions.

The detailed approach to parking provision can also be found in the Transport Strategy.

10.64 Bus services will be provided to the main destinations of Guildford, Horsham, and Cranleigh. These buses would run as specific services on an existing or overall route and would aim to have minimal stops to optimise the journey times from and to Dunsfold Park. A direct route is proposed on the A281 between Horsham and Guildford rail stations calling at Dunsfold Park and Bramley. In addition, a second short service will run between the centre of Cranleigh and Dunsfold Park. Longer distance services, e.g. to Guildford and Horsham, will be served by high quality vehicles with enhanced on board services such as free wi-fi internet connection. Real time travel information will be provided in the reception areas of all employers in order to ensure that employees have up to date and accurate public transport information before making their journey.

10.65 The applicants forecast that with the full Transport Strategy in place there could be a one third reduction in resident vehicle trips and the focus of the strategy on particular destinations and journey types is such that Cranleigh is forecast a reduction of over 60%, and Guildford and Godalming of at least 37%. Reductions for employee vehicle trips are forecast to reduce by 20%. These reductions are based on projected reductions, and the applicants consider there is potential for higher reductions should the strategy be very successful.

10.66 The Transport Assessment and the implications of the development have been considered by Surrey County Council as the Highway Authority and West Sussex County Council in view of the closeness to the county boundary. Both Highways Authorities raise objection to the proposal with both commenting that the development as proposed cannot demonstrate a

compatibility with location and infrastructure policy. SCC consider that it is very unlikely to be capable of doing so, primarily due to its setting within a deeply rural part of the Borough. The key issues that have come out of this process 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.

10.67 The recommendation of SCC Highways is to refuse permission and WSCC object because of increase in traffic on the A281 and deficiencies in the transport assessment. There is also the issue of the impact of additional traffic in nearby villages, settlements and on country roads arising from the development since it cannot be taken for granted that all traffic would confine itself to the A and B Class roads. WSCC, Chichester and Horsham Districts and Parish Councils all make this point.

10.68 The new dwellings would be located within a 2km walking distance of on-site services, facilities and employment in accordance with the advice in paragraph 75 of PPG13. This distance is also convenient for cyclists.

However access to higher order facilities in Cranleigh is beyond both the 2km distance for pedestrians and 5km for cyclists.

10.69 On a site such as this one, that is remote from high order facilities, it seems only reasonable to assume that all those who could afford them would own cars, and there is little doubt that the people who could afford the proposed houses would also be able to afford at least one car. With a car available, the majority would most likely use it to travel away from Dunsfold Park when they need to unless there is a genuinely attractive alternative form of transport. Whilst the applicants have indicated that the first preference for market price and affordable housing would be given to existing and new Dunsfold Park employees this would not be maintained and in practice there would be little effective control over where residents would work and ultimately over their choice of mode of travel.

10.70 The success of any Transport Strategy and Travel Plan relies on the availability of viable and practical alternative options, incentives, reasonable costs, enforceable sanctions but above all convenience. Ultimately the Transport Strategy must be able to influence choice if it is to succeed. A Strategy that shows potential for reductions in car trip generation is only a starting point and whilst the proposal has been well researched and put together it does not overcome the fundamental problem of the site's unsustainable location. As the Transport Assessment concludes:

*“The proposed development at Dunsfold Park is ambitious and therefore the transport strategy to accompany it is also ambitious in its proposals”*

10.71 It is considered that the applicant's approach to Transport and the Travel Plan are worthy attempts to influence travel choice and reduce greenhouse gas emissions. However they cannot overcome the fact that clearly national and local planning policies are aimed at directing developments to locations that have good access to sustainable means of transport. Dunsfold Park is not such a site. As a result the applicant's transport proposals do not overcome the policy objection in the form of *SEP CC2, CC8a, T1, T5; SSP policies LO1, DN2 and WBLP policies D1, IC1 and M1.*

Conclusion: Transportation

The Transport Strategy and Travel Plan cannot overcome the fundamental fact that Dunsfold Park is the wrong place, in planning policy terms, in which to site a major development of this nature. As well as the reasons recommended by SCC Highways it is considered that there would also be a material increase in traffic movements on and along the surrounding rural road network that would materially detract from the rural character and amenity of the area.

Community facilities and services

10.72 The proposed new settlement is designed to be self-contained for daily life and would embrace mixed-use development principles. It would not be of a

size to be self sufficient for all purposes and services as the quantum of development would not be sufficient to support such services as a secondary school and major supermarket, bank etc. Nevertheless the proposal includes the development of a village centre including local shops, cafes and restaurants, a primary school, sports centre, health care and other services to meet day-to-day needs. This is explained in vols. 1 and 11 of the supporting statements.

10.73 The village centre has been designed, in the applicants' words, to support the competitiveness of industrial and commercial firms at the site by making Dunsfold Park a more attractive place to work, especially for skilled workers who may have a wider choice of job locations. The new village centre is seen as being of further benefit to the Cranfold settlements that have seen the gradual loss of services and facilities.

10.74 The village services are designed to meet the day-to-day needs of residents and workers and those of visitors attracted by Dunsfold Park and by the aviation history. They are intended to complement, not compete with, the much more extensive services in Cranleigh. The facilities planned for Dunsfold Park are:

- 6 shops (100 sq.m per unit);
- 1 convenience store (300 sq.m);
- 4 units for restaurants & cafes (100 sq.m per unit);
- 2 schools: 1 primary school (capacity for two-form entry and 420 students) and 1 special needs school (80 students);
- 1 unit for primary health care;
- ecumenical church;
- health club/sports centre;
- 100 bedroom hotel;
- aviation museum (celebrating the history of the site); and
- community centre (multi-purpose including shared IT facilities)

The scale and scope of the village centre fits the definition of a local centre in Annex A of PPS6. Higher order retail facilities would make the new settlement a destination in its own right and attract additional traffic to the site.

10.75 Secondary schooling is planned to be accommodated by taking up spare capacity at Glebelands School in Cranleigh (some 140 places) and by providing for its expansion to cater for the demand for places arising at Dunsfold Park.

10.76 Any community requires essential facilities and services if it is to have an identity and community spirit. At the heart of the development will be the village centre grouped around a market square. This will be sufficient for the essential daily needs of the residential and commercial community and but higher order shopping needs would have to sought at other larger centres namely Cranleigh, Guildford, Horsham etc. The village centre would be the central transport node.

10.77 On their own, the proposals for the village centre represent a realistic level of provision for the essential daily needs of a settlement of the size proposed.

For this reason the community facilities proposed would not conflict with *SPP policies DN1 & DN12 and WBLP policies D2, CF2, 3, S2, 6, LT7, D13 & D14.*

Conclusion: Community facilities and services

It is considered that the level of service provision for the new settlement and the proposed approach to creating and nurturing a new community would be acceptable if the concept of a new settlement were to be accepted.

Environmental Impact

10.78 The environmental impact of the development has been addressed through a comprehensive Environmental Statement that addressed the following matters

- Rationale for the scheme selection
- Alternatives
- Description of site and proposals
- Consultation
- Agriculture and soils
- Economic issues
- Social and community well being
- Landscape and Visual Amenity
- Ecology and Nature Conservation
- Cultural Heritage and Archaeology
- Air Quality
- Noise and Vibration
- Land Quality
- Hydrogeology and water resources
- Cumulative Effects

10.79 In addition the environmental impact associated with the other subjects (eg Transport (vol. 8) Flood Risk (vol. 4), Waste Management (vol.16) have been addressed in separate subject reports as has the Carbon Assessment (vol.10), Construction (vol. 13), Energy Strategy (vol.14) and Water Strategy (vol.15).

10.80 It is considered that the Environmental Statement has followed the Scoping Opinion issued in July 2006 and addresses the issues identified. The approach being taken to environmental impact assessment accords with the main thrusts of *SEP policy CC1, NMR2, 3, 7, EN1, 2, W2; SSP policies SE1, SE2 and WBLP policy D3.* Consultees have not objected to the principles of the Environmental Statement, although there are areas of concern about ecology (Chichester District), landscape (Natural England), Noise and Air Quality (Horsham District).

10.81 The Planning and Climate Change Supplement to *PPS1*, addresses the need to reduce carbon dioxide emissions, among other things. *PPS3* makes a similar point, in relation to residential development, about adapting to and



reducing the impact of, and on, climate change. *SEP policy CC2* seeks to reduce greenhouse gas emissions and proposes a range of measures: greater resource efficiency, improving the energy efficiency of buildings, changing travel demand and modal choices, carbon sinks, renewable energy and reducing the amount of biodegradable waste landfill. Targets are set to reduce the region's carbon dioxide emissions by at least 25% below 1990 levels by 2015.

10.82 *SEP policy NRM7* seeks an improvement in air quality and proposes a range of measures: transport and congestion management, the use of cleaner transport fuels, mitigating the impact of development, reducing exposure to poor air quality through design and use of best practice during construction activities. *SSP Policy SE1* requires that development must comply with prevailing standards for the control of emissions to air and land.

10.83 The proposals for Dunsfold Park are designed to achieve the highest performance in terms of carbon emissions and impact on climate change that is compatible with the economic viability of the scheme. Key measures to deliver this performance include:

- A Transport Strategy with measures to reduce the need to travel, to promote more sustainable modes of transport and to encourage the use of fuels that pollute less.
- An Energy Strategy that will achieve Level 6 of the Code for Sustainable Homes.
- A Water Strategy which will achieve Level 6.
- A Waste Strategy that maximises the proportion of waste for re-use and recycling/recovery and minimises the volume going to landfill.
- A construction approach that will be developed to maximise recycling of existing resources and to exploit the potential for innovative and efficient construction and procurement.
- Dunsfold Park will provide housing and space for business with significantly lesser impacts on climate change than would typically be expected.
- Dunsfold Park is not located in an area of high sensitivity to air quality deterioration. An Air Quality Assessment is included in the Environmental Statement.
- The impacts of the proposals have been assessed in the Environmental Statement and no major negative impacts, which are not mitigated, identified.

10.84 Development of this scale brings a number of impacts that in themselves can usually be managed and mitigated. On the other hand the careful management and mitigation of the environmental impact would not necessarily render a development in the wrong location acceptable. The alternative of developing in urban locations would not necessarily face such planning objection and potentially offers a more sustainable form of development.

10.85 The environmental impacts associated with the development have been examined. It is considered that, if a new settlement were to be considered in

this locality, the Environmental Statement, in the main, demonstrates that the environmental impact could be managed and the effects mitigated but this does not overcome the location issue. On the basis of the consultation responses received it is considered that the Environmental Statement has adequately explained the environmental implications and outlined potentially acceptable mitigation measures. In that respect the aims of *SEP policies NMR1, 3 & 7; SSP policy SE1 and WBLP policy D3* are considered to be met, but the locational drawbacks would not be resolved.

**Conclusion: Environmental Impact**

With the exception of those environmental impacts associated with the isolated rural location of the proposed development the assessment of environmental impact and the mitigation of effects would address the planning issues. However the fact remains that the environmental impact of a new settlement in this location would be unacceptable when compared to a similar development in a more sustainable location.

**Landscape and Design**

- 10.86 The application site does not lie within a nationally recognised landscape designation such as the Surrey Hills AONB. However it is partly within and adjoins the area of great landscape value (AGLV). In landscape terms development would not usually be permitted in the countryside but policy is worded to both protect and enhance the landscape (*SSP policies SE5, SE8 and WBLP policies C3 & C6*). Coupled with the general policy of protection and enhancement is the need to respect woodlands, trees and hedgerows (*SSP policy SE9 and WBLP policies D6, D7 & C7*) as well as sites important for nature conservation. With the exception of the new link road to the A281 the development be completely within the operational area of the former aerodrome and involves no loss of trees or important landscape features.
- 10.87 The aerodrome is largely out of immediate public view close to but the most unrestricted view of the site is obtained from the top of Hascombe Hill, which is some 3 to 3.5 km away in the Surrey Hills Area of Outstanding Natural Beauty (AONB). From there, Dunsfold Park is seen as a wide open space set amongst fairly unspoiled countryside which stretches to the distant South Downs. The main aerodrome buildings have are screen of trees on their north side and there are signs of sporadic activity visible along the southeast edge of the Park. The central part of the site and core of the new settlement appears as an undeveloped green space. The three runways criss-cross the grass, but these are dark and relatively inoffensive.
- 10.88 Against that background the development of a new settlement amounting to 105ha of development would represent a substantial area of development that would intrude into the landscape and the AGLV. Such a scale of development would appear out of keeping and intrusive in this countryside setting, to be protected for its own sake. The change to the vista from the high panoramic viewpoint of Hascombe Hill would detract from the rural character of the landscape contrary to *SEP policy CC12, SSP policy SE8 and WBLP policy C3*.

- 10.89 On the other hand the landscape proposals for the site are considered appropriate and those for the non-built-up part of the site would create an environment that would complement the landscape character of the area.
- 10.90 The application is submitted for outline planning permission but with very firm proposals for the form, shape and content of the settlement. The Design and Access Statement (vol.2) explains the design principles. The architectural quality of the scheme would be based Surrey vernacular. CABE are not convinced by this approach and suggest that the development should reflect “a 21st century model for sustainable living, instead of a conservative image of pre-war housing.” This is very much a question of taste but on balance the applicant’s approach, which seeks to reflect Surrey vernacular, is preferred to CABE’s. On balance the design approach is considered to comply with *SEP policy W2, SSP SE4 and WBLP policy D4*.

Conclusion: Landscape and Design

The masterplan approach to design is regarded as acceptable but the scale and mass of built development would be visually intrusive and of a scale that would materially detract from the character and visual quality of the area.

Open space and recreation

- 10.91 *PPS1* focuses on high quality and inclusive design with well-planned public spaces that bring people together and provide opportunities for physical activity and recreation. *PPS3* calls for design that enables good access to amenity and recreational space. *RPG9* urges that opportunities should be provided for leisure and recreation in, and access to, the countryside in ways that retain and enhance its character. A range of provision should be made to meet the needs of all including the physically impaired in sustainable locations and in ways that respect the agricultural, biodiversity, landscape and heritage value of the countryside.
- 10.92 *SSP policy DN13* states that opportunities for informal recreation, such as improved pedestrian and cycle networks should be provided in conjunction with development. *WBLP policy LT6* provides for permission to be granted for development for leisure or tourism related purposes subject to provisos about appropriateness to the surrounding area, detriment to residential amenities and the impacts of facilities that will attract large numbers of visitors. *WBLP policy H10* re-iterates the provisions of *PPS3*. *WBLP policy LT11* promotes the retention and extension of rights of way for walking, horse riding and cycling. *WBLP policy LT8* provides support for new sports grounds, subject to provisos.
- 10.93 The open space and recreation elements of the development comply with the above policies concerning open space, leisure and recreation provision in a manner that is sensitive to a countryside location and to nature conservation interests. The development will involve the conversion of much of the private airfield into 143 ha of public open space, connected to the existing local

network of footpaths and bridleways. Approximately 58% of the site will become structural open space as part of the development.

- 10.94 The Open Space, Recreation and Access to Nature Strategy vol. 12 details the provision of land for active recreation and play as well as areas of natural open space, including the provision of allotments, playing fields and children's play space. Dunsfold Park will exceed established requirements and benchmarks for open space. In addition to communal assets such as the 72 ha Benbow Country Park – which will be the largest public open space in Cranfold – 1,850 of the 2,601 dwellings will have private gardens.
- 10.95 A network of footpaths and cycleways will be accessible to those with limited physical mobility and link to local networks. Creating publicly accessible routes will shorten distances between certain pairs of destinations within the local walking and cycling network. Residents and employees will benefit as walking and cycling routes are integrated into the design of the village as viable options for commuting to and from the village.
- 10.96 Dunsfold Park will provide a canal basin with moorings, and construct bridges that cross the canal at a height necessary to safeguard the potential of the canal for navigation. Dunsfold Park would therefore contribute towards the restoration of the Wey and Arun canal for both water-based recreation and as a green corridor for the benefit of recreation and biodiversity. This would accord with *SSP policy SE10 and WBLP policy C12*. Additional cultural, leisure and recreational facilities in the village will include a sports centre, aviation monument and aviation museum. Good access to these will be provided through new public transport links.
- 10.97 Sport England supports the sport and recreation aspects of the proposal. Taken in isolation the open space and recreation elements of the proposal would not conflict with the policies of the development plan. They would exceed the minimum level of provision and provide an attractive accompaniment to the settlement. In addition they provide an opportunity to enhance the visual and ecological qualities of the site and in so doing comply with the landscape enhancement requirements of *SSP policies SE8 & 9 and WBLP policies D7, C6 and C12*.

Conclusion: Open space and recreation

The proposals for open space and recreation would be acceptable if the principle of the development as a whole were acceptable.

Employment

- 10.98 *SEP policy RE2* exhorts planning authorities to make efficient use of existing and underused accessible employment sites but with a focus on urban areas and sites that promote the use of public transport. The word underlined is that included in the SoS's changes. Other *SEP* policies support addressing intra-regional economic disparities and changing work practices. *SSP policy LO7* supports the development needs of sustainable economic growth through the re-use of suitably located land.

10.99 The details of the how employment space is to be developed are set out in the Economic Development, Shops and Services Strategy (vol. 11). The site currently accommodates some 44,721 sq.m 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 twelve years):

- 8,029 sq.m will be demolished to remove buildings located outside the main industrial area and to remove obsolete premises; this will leave 36,692 sq.m of existing space being retained in the long term.
- Capacity within the existing industrial area will be used to add up to 15,247 sq.m 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 sq.m of B1 (a/b) space adjacent to both the industrial and residential areas.
- The resulting total of employment space, apart from that in the village centre and the on-site utilities, will be up to 59,854 sq.m.

10.100 Employment on the site is expected to total about 2,000 employees, comprising:

- 1,670 employees in the above industrial and commercial premises;
- 280-310 employees in the village centre, on-site utilities and the management and maintenance of the village.

10.101 The Master Plan for Dunsfold Park complies with the above policies:

- Draft PPS4 recognises the role of economic development in rural areas such as Cranfold. The Master Plan proposals will diversify the choice of jobs accessible to local residents (reducing the dependence on the (consumer) service sector and the pattern of residents commuting out), increase the locally accessible supply of labour for local public and private employers and contribute to Surrey's role as part of the nationally important Greater SE economy.
- Dunsfold Park is a brownfield site and the employment development proposals seek to make optimum use of the existing serviced site.
- The accessibility objectives of the above policies will be achieved through the creation of a mixed use settlement, through the layout adopted in the Master Plan (see the Design and Access Statement), through the Transport Strategy and through travel plans for residents and employers.
- The proposals demonstrate the synergy between economic development and social and environmental improvement by creating a mixed-use development in place of a single use. A comprehensive plan for the site enables social issues, for example proximity of activities, and environmental issues, for example the enhancement of biodiversity, to be addressed whilst promoting a viable and diverse employment site.
- The aim of the selective demolition of premises and the expansion of employment space on the site is to create a diverse range of modern premises attractive for a wide range of businesses including start-ups, SME's, firms in new technologies and for existing firms in Cranfold with growth potential. Mixed B1 (a/b) development forms part of this diversification, catering for the growing volume of business taking place

in studio/research/office accommodation. This expansion is important in order to provide the flexibility to meet changing business demands and a changing global and environmental climate, as set out in Draft PPS4.

- The site has already generated local intertrading opportunities; the expansion and diversification will increase the scope for the development of business clusters, especially in new and emerging sectors e.g. in environmental technologies, advanced manufacturing and automotive related, and for co-location benefits (see Economic Issues chapter of the Environmental Statement).
- Home-working, already widely practised in Cranford, will be promoted through appropriate technology and shared ICT provision in the village centre.

10.102 At the local level the *WBLP at policy IC1* makes permission for industrial and commercial development dependent on compliance with other policies in the Plan, their being no loss of valuable other uses, the suitability of the location and accessibility by non-car modes. *WBLP policy IC5* proposes limits on the intensification or expansion of industrial and commercial areas, where it would cause damage to residential amenity or environmentally sensitive areas.

10.103 The applicants argue that their proposals to increase employment floorspace and employee numbers complies with these policies on the basis that:

- There will be no loss of valuable other uses.
- The removal of the aviation uses, apart from the Air Ambulance facility, allied to the abandonment of the planning permission for aviation activities, can be expected to bring valuable benefits in terms of reduced disturbance to neighbouring residential areas or environmentally sensitive areas.
- The accessibility of the industrial area will be improved, as set out above, by the development of new access associated with the development proposed in the masterplan (see the Design and Access Statement), the Transport Strategy and the Travel Plan.

10.104 *WBLP policy IC3* places the onus of proof on the developer to demonstrate that well-established industrial and commercial land will not be lost to other development without thorough examination of its potential for employment use. On the other hand *SEP policy RE2* requires employment land to be accessible and usually focused on urban areas promoting the use of public transport.

10.105 The applicants consider that the context of the employment use of Dunsfold Park complies with policy because:

- Dunsfold Park should be considered a well established site given its permanent planning permission for the assembly, repair and flight testing of aircraft, its long history in that use and its subsequent successful reoccupation by some 80 firms employing about 638 people.
- In any event there will be no net loss of industrial or commercial space in that industrial and commercial premises will be rationalised within the

main employment area, where they can be properly serviced, screened and readily accessed from the residential area.

- Optimum use of the site will be made to realise its potential to accommodate about 2,000 jobs.

10.106 The whole purpose of the Master Plan is to add residential development to the substantial employment (both existing and potential) on the site. This concept is not found within the *SEP*, *SSP* or *WBLP*. Whilst there might be some merit in bringing housing to an employment centre it is considered that Dunsfold Park is not the right place to do this. Furthermore the increase in employment floorspace by 33% would be in conflict with *SEP*, *SSP* and *WBLP* policies and reinforces the unacceptable nature of the proposal.

Conclusion: Employment

The existence of the employment centre at Dunsfold Park does not justify the creation of a new settlement and the expansion of employment development by 33% would conflict with planning policy.

Nature Conservation issues

- 10.107 *PPS1* supports the conservation and enhancement of wildlife species and habitats and the promotion of biodiversity. The Planning and Climate Change Supplement to *PPS1* adds the need to take account of the potential effects of climate change on natural assets. *PPS3* makes the retention or re-establishment of the biodiversity within residential environments an issue in assessing design quality. *RPG9* calls for positive action to achieve the targets set in national and local biodiversity action plans and for woodland habitats in the Region to be increased whilst protecting the biodiversity and character of existing woodland resources. *SEP Policy NRM5* makes similar points about sustainable woodland management and promoting the economic use of woodlands, including for wood fuel. Benefits of well-managed or new woodland include the restoration of degraded landscapes, screening of noise and pollution, providing recreational opportunities, helping to mitigate climate change, and contributing to floodplain management. *SEP Policy NRM4* seeks to avoid a net loss of biodiversity, and actively pursue opportunities to achieve a net gain across the region. Special attention should be paid to designated sites and opportunities for biodiversity improvement should be pursued.
- 10.108 *SSP SE6* and *WBLP policies C10* and *D5* expect development to contribute to actions safeguarding and managing habitats. Developers are required to provide information on important features and to propose how impacts on their conservation will be mitigated. *WBLP policy C11* extends protection and enhancement of ecological features to undesignated sites. *SSP policy SE9* and *WBLP policies C6*, *D6* and *D7* provide for trees and woodlands, particularly ancient woodlands, to be protected and their management promoted.
- 10.109 The surveys undertaken to identify the woodland, hedgerow, nature conservation and species importance of the site and its surroundings are set out in the Environmental Statement (vol.3). The site does not contain any

nationally or internationally designated sites for conservation. The *WBLP* identifies a number of “Sites of Nature Conservation Importance” in proximity to the site. Mitigation measures are proposed where necessary. The proposals for the structural open areas of the site show how the nature conservation interest of the site will be enhanced and protected and the relationship to nearby areas of ecological value respected. The Environmental Statement assesses that through mitigation and enhancement measures, the overall impact on biodiversity will be positive. A Biodiversity Survey and Report is included in the Environmental Statement.

- 10.110 Detailed proposals for the promotion of biodiversity within the built areas would be the subject of reserved matters submissions. Development at Dunsfold Park will result in a net addition to woodland coverage and the number of trees on the site. The development involves no loss of protected trees. The felling of a small number of trees will be necessary - for example to put in the link road to the A281 and ensure the safe operation of the relocated Surrey Air Ambulance – but the land which is planned to be developed is entirely devoid of woodland at present. A Tree Survey (Tree Scoping Study) is included in the Environmental Statement.
- 10.111 The associated sustainable energy proposals would generate a biomass fuel supply chain, involving forestry and woodland products within the locality. This would be achieved through sustainable forestry and woodland management arrangements. This will underpin the viable management of local woodlands, including those within the Surrey Hills AONB, for their landscape, recreation, nature conservation and commercial forestry benefits. Hedgerow loss will be avoided where possible and retained hedgerows subject to responsible environmental stewardship.
- 10.112 The loss of the large mass of greensward that lies between and around the runways would have little significance for ecology since it is largely grass and has little ecological diversity. The nature conservation and ecology proposals would create new ecological habitats especially in association with the open space proposals. No objection is raised by Natural England but Surrey Wildlife Trust are concerned that the development would represent a significant increase in human presence in the area and consequent would disturb wildlife and habitat. They consider that additional traffic; pollution incidents, fly tipping and pet activity can all have a significant adverse affect on wildlife. Chichester District may a number of comments about ecology and the possible impact on bats in particular.
- 10.113 It is considered that the interests of ecology and nature conservation would not be significantly prejudiced by the proposal since the creation of new habitats will add to ecological diversity and enhance the area for flora and fauna compared to the present land use. Habitat and species management is proposed for inclusion within any section 106 agreement concerning the development of the site.

Conclusion: Nature Conservation issues

It is considered that the proposals for habitat enhancement and the re-  
invigoration of woodland as part of providing biomass fuel for the CHP  
plant mean that interests of ecology and nature conservation are  
safeguarded.



## Sustainability

10.114 The applicants' submitted Sustainability Statement and appendices explains how sustainability principles are proposed to be met within the scheme throughout the demolition, construction and operational phases of the development. The proposed scheme has been developed in accordance with the following sustainable objectives:

- re-use of previously used, brownfield land;
- conserve energy, materials, water and other resources;
- ensure designs make the most of natural systems both within and around the building;
- reduce the impacts of noise, pollution, flooding and micro-climatic effects;
- ensure developments are comfortable and secure for users;
- conserve and enhance the natural environment, particularly in relation to biodiversity;
- promote sustainable waste behaviour in new and existing developments, including support for local integrated recycling schemes; and
- Integration of Combined Heat and Power.

10.115 The Appendices to the Sustainability Statement cover the SEEDA Sustainability Checklist, the Code for Sustainable Homes and a BREEAM assessment for the Retail elements. They demonstrate that the development would meet the aims and objectives of the Planning and Climate Change supplement to PPS1 published in December 2007. It is considered that the development would therefore comply with *SEP policy CC4*, *SSP policy SE2* and *WBLP policy D3*.

### Conclusion: Sustainability

The proposals incorporate a number of commendable sustainable development principles but these do not provide overriding reasons for approval when set against other policies.

## Sustainable energy, resources and waste management

10.113 *PPS1* has a broad aim in the planning of development to ensure that outputs are maximised while resources used are minimised over the lifetime of the development. *PPS3* states that design should facilitate the efficient use of resources, during construction and in use. The Supplement to *PPS1* puts these objectives into urgent context of addressing and adapting to climate change. *RP9*, Policy INF3 puts the emphasis on minimising waste generation and providing locally for its re-use, recovery and disposal. The policies of the SEP embrace the same objectives.

10.114 *SSP policy SE2* requires that all new development should incorporate renewable energy proposals to reduce energy consumption by 10%. In plain terms this means that the energy consumption level of the development should be calculated and then renewable energy measures incorporated to reduce energy consumption. The same 10% figure is included in *SEP policy*

*EN1*. However the SoS modifications to *policy EN1* (to be *policy NRM11*) promotes greater use of decentralised, ie. integral energy generation and renewable or low carbon energy in new development. The Draft Surrey Waste Plan focuses on both the minimisation of waste and then the promotion of reuse, recycling and recovery of resources from waste.

- 10.115 The applicants set a target of a zero carbon development with respect to energy consumption, to correspond to the achievement of Level 6 in the Code for Sustainable Homes and a similar standard for new industrial and commercial premises. This would be achieved by:
- Energy efficiency measures in all homes to reduce CO2 emissions by 25% compared with Part L of the Building Regulations (2006)
  - Active generation of energy from renewable sources, using a 3.5 Mwe capacity CHP plant fuelled by locally sourced biomass from sustainable forestry and woodland.
  - Supply of electricity to all homes and district heat to all homes and commercial premises from the CHP plant
  - Offsetting of the carbon emissions from the energy consumption of the industrial premises through sales of electricity from a renewable source to the national grid.

These issues are explained in the Energy Strategy (vol. 14) and the impacts of the planned CHP plant are considered in the Environmental Statement (vol. 3).

- 10.116 The on-site utilities comprise:
- A 3.5 MWe Combined Heat and Power plant, fuelled by locally sourced forestry and woodland produce, providing electricity to all the residential properties and heat to the commercial premises, and offsetting the carbon emissions from the energy consumption of the industrial premises.
  - A waste treatment plant which would operate on the residual waste after sorting of recyclables by households; through autoclaves (heat and pressure treatment, not combustion) and materials separation the residual waste will be converted to fibre product suitable for recycling or recovery for bio-ethanol, recyclables and residual fractions for disposal.

Both plants would be located in a designated energy park adjacent to the main access to the site.

- 10.117 The applicant proposes to develop both a 3.5 Mw. capacity CHP plant and a waste treatment plant and on the site fuelled by 60,000 tonnes of locally sourced woodchip. It would provide for the power requirements of all the new buildings within the proposal and for the energy requirements of existing commercial buildings when they are replaced. The size of the CHP plant is thus of an appropriate scale to the development. This accords with *SEP policy EN1/NRM1*. 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 would 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.

- 10.118 The CHP plant would 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. The concept is not new but there are few examples of such CHP plant in commission for a development of this scale. The applicant's research indicates that there is a sound economic and ecological base for drawing wood waste from sustainable woodlands in the locality. They are confident that the on-site CHP plant would create a new market for forestry and woodland produce where such woodland is currently uneconomic and there is a lack of interest and focus on woodland management. SCC has expressed some misgivings about the reliability of sufficient locally sourced quantity of wood waste and the competition from other potential biomass heating schemes within the County and surrounding areas.
- 10.119 Dunsfold Park's 3.5MW CHP plant would represent approximately 5% of the target provision of thermal biomass electricity production in the Thames Valley and Surrey sub-region in 2016. The CHP plant and district heating infrastructure would comprise a principal component of Dunsfold Park's mitigation of the impacts of the development on carbon emissions. It is considered that the proposed CHP plant would meet the sustainable energy objectives of national and local planning policy.
- 10.120 *PPS1* promotes the sustainable use of water resources; and the use of sustainable urban drainage systems in the management of run-off. *RP9*, *Policy INF2* offers support for new development, which is located and carried out to allow for sustainable provision of water services and to enable investment in sewage treatment and discharge systems to maintain the appropriate standard of water quality. Techniques to improve water efficiency and minimise adverse impacts on water resources, will be encouraged. *SEP Policy NRM1* states that, in order to conserve water resources and quality, a twin-track approach of demand management and water resource development will be pursued, together with development of sewerage and wastewater treatment infrastructure. *SEP Policy NRM3* adopts a sequential approach to development in flood risk areas. Inappropriate development should not be permitted in zones 2 and 3 of the floodplain.
- 10.121 *SSP Policy SE1* and *WBLP policies D1 & D3* promote the efficient use of water and its management.
- 10.122 The Water Strategy for the development is designed to achieve Level 6 of the Code for Sustainable Homes. Further details, including considerations for foul sewerage treatment, are contained in the Water Strategy (vol. 15). The aim is to reduce consumption from 153 litres per person per day to 80 lpppd through the installation of water saving devices in the homes. Of the 80 litres, a proportion will be derived from non-potable sources including rainwater harvesting. It is proposed that the potable supply be procured from a licensed water company. Similarly wastewater is proposed to be treated off-

site by a licensed water company. In each case the cost of additional infrastructure will be borne by the developer.

- 10.123 Dunsfold Park is not located in zone 2 or 3 of a floodplain. The Hydrology and Water Resources chapter of the Environmental Statement explains that risk of flooding on the site, and the impacts of the development on flooding elsewhere, are negligible. A sustainable urban drainage scheme (SUDS) is proposed, details of which are set out in the Flood Risk Assessment (vol.4).
- 10.124 SCC has 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.
- 10.125 The proposal for treating residual domestic waste on site would be dependent on the applicant entering into negotiations and coming to a satisfactory agreement with the relevant 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.
- 10.126 The autoclave process is innovative and progressive and is based on European technology. It is not currently in large-scale use in the UK. 85% of waste will be reused or re-cycled within site. 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 the 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, this issue would need to be addressed in the Waste Management Plan for all new buildings on the site.
- 10.127 Whilst SCC considers that there are some issues associated with the energy and waste proposals to resolve it s acknowledged that proposed 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.
- 10.128 Some existing buildings will need to be demolished together with three runways and areas of 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.

- 10.129 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, SCC consider that this approach complies 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.
- 10.130 The sustainable energy issues have been the subject of evaluation by external consultants and discussion with the applicants. They argue that a better approach than policy SE2 is to focus on carbon reduction. They argue that their approach would produce a greater reduction in carbon emissions than the SE2 10% reduction through renewable energy measures.
- 10.131 Taken on their own, the proposals for sustainable energy, resource and waste management accords with current and proposed policy and there are no grounds for objection.

Conclusion: Sustainable energy, resources and waste management

It is considered that, provided the sustainable energy objectives are/were included in a Section 106 agreement, the aims and objectives of national and local planning policy would be met by the facilities.

Other issues

- 10.132 Volume 20 of the submitted application documents sets out the applicant's suggested Heads of Terms for a section 106 agreement. Appendix F explains these in more detail
- 10.133 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.

## **11.0 Conclusion and recommendation**

- 11.1 The application as a whole is deserving of very careful consideration and has been very seriously thought out and put together. The proposal is an interesting concept for development that embraces novel approaches to sustainable development, waste management and transportation. The aim of developing a mixed-use community from the present business park has some planning credibility. Many of the ideals the applicants aspire to can be seen in the Government's Eco Towns initiative but the proposals for Dunsfold Park are on a smaller scale.
- 11.2 As a concept the proposal has some merit and the package of measures has done its best to address the planning issues associated with the existing resource at the site, community infrastructure, open space, landscape and housing issues. The approach to energy resource, waste management and sustainable construction are particularly to be commended as being at the forefront of current thinking. The proposal has also striven to address the transportation issue and reduce reliance on the private motorcar.
- 11.3 The timing of the planning application as the South East Plan moves towards completion and the Borough Council embarks on the Core Strategy of its Local Development Framework is not conducive to sound planning. The scale of the proposal and its impact should, more properly, be considered in the context of Borough wide strategic choice of development.
- 11.4 At the beginning of section 10, Planning Considerations, it was explained that section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application for planning permission be determined in accordance with the relevant policies in the Plan, unless material considerations indicate otherwise. Material considerations include national and regional planning guidance. The applicants consider that there is a strong case for an exception to be made to the policies of the Development Plan. On the other hand the majority of consultees and representors strongly argue that such a case has not been made.
- 11.5 Although there are elements of the proposal that are to be commended in the final analysis the one thing that the application cannot do is change the isolated rural location of the site. Whilst essential on-site facilities and services can be provided, together with public transport facilities to other settlements, employment, transport infrastructure and services there is no guarantee that the majority of residents and employees would use the alternative means of transport to the private motor car. For this reason the package of measures to address reliance on the private motorcar would not overcome the fundamental planning objections to the location of the proposed new settlement.
- 11.6 For these reasons it is considered that there is no case for an exception to planning policy to be made.

## **RECOMMENDATION:**

### **Planning permission be REFUSED for the following reasons:**

1. The proposal conflicts with national, regional and local planning policy advice regarding the countryside beyond the Green Belt set out in Planning Policy Statement 7, Policy CC8a of the South East Plan (policy SP3 in the Secretary of State's proposed changes), Policy LO4 of the Surrey Structure Plan 2004 and Policy C2 of the Waverley Borough Local Plan 2002. Within these areas the countryside is to be protected for its own sake and development in open countryside outside existing settlements is to be strictly controlled and urban areas are to be the focus of development. The proposed development does not comply and conflicts with the requirements of those policies and there no exceptional reasons have been advanced to justify an exception to these policies.
2. The site lies partly within and adjacent to an Area of Great Landscape Value within which the landscape character is to be conserved and enhanced. In the opinion of the Planning Authority the proposal would result in a visually intrusive development of a scale that fails to conserve and enhance the landscape and would materially detract from its character and the visual quality of the area. The proposal is considered to conflict with the strategic and local policies set out in Policy SE8 of the Surrey Structure 2004 and Policy C3 (b) of the Waverley Borough Local Plan 2002.
3. The proposed development represents a major quantum of development in the countryside unconnected with an existing urban area which, if permitted, would be seriously detrimental to the visual amenity and rural character of the locality contrary to Policies LO1, LO2, LO4, LO5 and SE8 of the Surrey Structure Plan 2004 and Policies D1, D4, C1, C2, RD1 of the Waverley Borough Local Plan 2002.
4. In the opinion of the Planning Authority the scale and nature of the proposed development are such that the implications are of great significance and potential effect for the Borough and a wider area. Furthermore the Regional Spatial Strategy makes no provision for a new settlement in this locality. The consideration of the planning application in isolation from the Core Strategy for the Borough would not be in the interests of sound planning and could, if permitted, have materially harmful consequences for development in other more sustainable locations.

5. Policy LO6 of the Surrey Structure Plan sets out details of the increase to be made in the housing stock within the Borough between 2001 and 2016. Policy H1 of the Draft South East Plan and the Secretary of State's proposed changes propose a house building target of 250 units per annum to 2026. The Planning Authority is satisfied that, having regard to Planning Policy Statement 3, sufficient land exists or can be allocated to meet the Borough housing requirement without having to resort to a new settlement unconnected with an existing urban centre that conflicts with the policies contained in the Draft South East Plan and the adopted Structure and Local Plans.
6. The proposal would result in undesirable expansion of commercial development in this predominantly rural area to the detriment of the character and amenities of the locality both visually and by reason of the additional activities including traffic movements likely to be generated on the site in conflict with the Policies LO4 and SE4 of Surrey Structure Plan 2004, Policies D1, D2, D4 and IC1 of the Waverley Borough Local Plan 2002.
7. 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, the Draft South East Plan policies CC1, CC2, CC3, CC8a, CC12, RE2, H3 & T1; Development Plan Policy LO1 of Surrey Structure Plan 2004 and Policy M1 of Waverley Borough Local Plan 2002.
8. 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. This would be contrary to Surrey Structure Plan 2004 and Policy M1 of Waverley Borough Local Plan 2002.
9. In the opinion of the Planning Authority the proposed new settlement is likely to involve a material increase in traffic movements on and along the surrounding road network which would materially detract from the rural character and amenity of the area by reason of noise, disturbance, inconvenience and visual impact contrary to Policies LO1, LO4, LO7, SE1, SE8, SE10 and DN2 of the Surrey Structure Plan 2004 and Policies D1, C2, C12, IC4, M1, M2 and M13 of the Waverley Borough Local Plan 2002.



## APPENDIX A

### 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

## APPENDIX B

### 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)  
Surrey Waste Plan 2008

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    Local Development Scheme 2007  
Waverley BC    Development Control Consultative Forum meetings

DEVELOPMENT PLAN POLICIES

**Draft South East Plan** *(note: the Secretary of State's proposed changes, 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 changes: 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 changes: 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 changes: 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 changes: 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 changes: 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 changes: 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 changes: 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 changes: 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 changes: deleted on the grounds of repetition).

- H4 Affordable Housing - sets out that LDFs will set targets for the delivery of affordable housing based on 25% provision of social rented dwellings and 10% of other forms of affordable dwellings. (SoS changes: policy renumbered H3.).
- H5 Housing Density and Design - 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 changes: 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 changes: 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 changes: 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 changes: 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 changes: 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 changes: 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 changes: 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 changes: policy renumbered NMR4*)

NRM7 Air Quality - outlines ways in which development control can help to achieve improvements in local air quality. (*SoS changes: 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 changes: 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 changes: 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 changes: 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 be 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 and 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>• create more sustainable patterns of development by</li> </ul>

	<p>exploiting accessibility by public transport</p> <ul style="list-style-type: none"> <li>• make 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> <p>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.</p>
<p><b>PPG4 Industrial, Commercial Development and Small Firms</b></p> <p>November 1992.</p>	<p>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 that minimise the length and number of vehicle trips, can be served by more energy efficient modes of transport, avoids adding unacceptably to congestion.</p>
<p><b>Draft PPS4 Planning for Sustainable Economic Development</b></p> <p>December 2007</p>	<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</p>

	<p>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>
<p><b>PPS7 Sustainable Development in Rural Areas</b> August 2004.</p>	<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>
<p><b>PPS9 Biodiversity and Geological Conservation</b> August 2005</p>	<p>Government guidance on conserving and enhancing biological Diversity with the broad aim of minimising impact and enhancement where ever possible through:</p> <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>
<p><b>PPS10 Planning for Sustainable Waste Management</b> July 2005</p>	<p>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.</p>
<p><b>PPS11 Regional Planning</b></p>	<p>Sets out the principles behind preparing a regional Spatial Strategy and that it should look at a 15 to 20 year period and</p>



September 2004	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>  March 2001	Government guidance that covers the integration of transport and planning through the promotion of sustainable transport choices, accessibility and reducing the need to travel, especially by car.

<p><b>PG15 Planning &amp; the Historic Environment</b></p> <p>September 1994.</p>	<p>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.</p>
<p><b>PPG16 Archaeology and planning</b></p> <p>November 1990.</p>	<p>Government policy and guidance on archaeological remains on land, how they should be handled and how they should be preserved or recorded.</p>

<p><b>PPG17 Planning for Open Space, Sport &amp; Recreation</b></p> <p>July 2002</p>	<p>Government guidance on underpinning people's quality of life by providing for open space, sport and recreation. The key objectives are:</p> <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>
<p><b>PPS22 Renewable Energy</b></p> <p>August 2004</p>	<p>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.</p>
<p><b>PPS23 Planning and Pollution Control</b></p> <p>November 2004.</p>	<p>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.</p>
<p><b>PPG24 Planning and Noise</b></p> <p>September 1994</p>	<p>Government guidance on minimising the adverse impact of noise and the considerations to be taken into account in determining applications.</p>
<p><b>PPS25 Development and Flood Risk</b></p> <p>December 2006</p>	<p>Government guidance on how flood risk should be considered at all stages of the planning and development process.</p>

## 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 Economic Development Partnership – No comments received**

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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 occurs 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 layout 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 crosscutting 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 layout 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 motorcar, 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 (interim comment)

### 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/Dunsofold 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 Dunsofold. 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	Dunsofold	Alfold	Dunsofold	Alfold	Dunsofold
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 Dunsofold (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	45m <sup>2</sup>
Three	57m <sup>2</sup>
Four	67m <sup>2</sup>
Five	82m <sup>2</sup> (2 storeys)
Six	95m <sup>2</sup> (2 storeys)

Seven	108m2 (with 2+ storeys)
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**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, and East Hampshire that 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 be a useful 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, pages 36) 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**

No comments received

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### **Waverley Borough Council Tree and Landscape 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.

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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 northeast 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 southeast areas calculations set out in the in the FRA indicate sufficient surface water attenuation is available to achieve Greenfield run off rates. *For the southeast area the FRA states that the storage is available within that part of the site.*

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 impedance 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 are more plentiful, so as not to exacerbate 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 wastewater 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, watercourses 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 were 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 County Council Social Services - No comments received**

### **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**

The PCT wish to be involved in any residential development discussions before decisions are made. The PCT are unconvinced that the effect on health is understood and would be keen to see solutions provided within the proposal.

The PCT suggest that around £3 to £4million s106 contribution for health provision is required.

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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 to 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 is 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 northwestern 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.

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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 southeastern 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 north-eastwards 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

**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 wastewater, 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.