

WA/2015/2395     Hybrid Planning Application; Part Outline proposal with all matters reserved for a new settlement with residential development comprising: 1,800 units (Use Classes C3), 7,500 sqm care accommodation (Use Classes C2); a local centre to comprise retail, financial and professional, cafes/restaurant/takeaway and/or public house up to a total of 2,150 sqm (Use Classes A1, A2, A3, A4, A5);  
Dunsfold Airport     New business uses including offices, and research and development industry (Use Classes B1a and B1b) up to a maximum of 3,700 sqm; light and general industry (Use Classes B1c and B2) up to a maximum of 7,500 sqm; storage and distribution (Use Class B8) up to a maximum of 11,000 sqm; a further 9,966 sqm of flexible commercial space (Use Classes B1(b), B1(c), B2 and/or B8);  
Limited (DAL)     Non-residential institutions including health centre, relocation of existing Jigsaw School into new premises and provision of new community centre (Use Class D1) up to a maximum of 9,750 sqm; a two-form entry Primary School;  
and Rutland     Open space including water bodies, outdoor sports, recreational facilities, canal basin and nature conservation areas; public transport routes, footpaths and cycleways; landscaping; the removal of three runways; all related infrastructure including roads, car and cycle parking, energy plant and associated equipment, water supply, telecommunications, drainage systems and waste water treatment facilities;  
(DAL) Limited     Part Full application for the demolition of 8,029 sqm of existing buildings and the retention of 36,692 sqm of existing buildings, for their future use for a specified purpose as defined by the Use Classes as specified in the schedule of buildings and their uses; and the temporary use of Building 132 for a construction headquarters.  
18/12/2015

As amended by addendum documents (site wide travel plan, transport assessment), Environmental Statement addendum (updates include flood risk, access traffic and transport, air quality and odour, noise and vibration) and amplified by additional information on retail impact, sustainability assessment, water strategy, responses to third party comments, received 01/09/2016, housing position statement with indicative housing mix received 28/09/2016, amended Drainage Strategy received 17/11/2016, Natural England Memo received 29/11/2016 and Risk assessment for treated sewage disposal received 30/11/2016.

This application is accompanied by an Environmental Statement (and addendum) at Dunsfold Park, Stovolds Hill, Cranleigh

Committee:     Joint Planning Committee  
Meeting Date:     14/12/2016

Was Public Notice  
required and posted: Yes

Grid Reference: E: 502938 N: 136774

Parishes: Alfold and Dunsfold (this application crosses 2 parish boundaries)  
Wards: Alfold, Cranleigh Rural and Ellens Green; and Chiddingfold and  
Dunsfold, (this application crosses 2 wards)

Case Officers: Peter Cleveland / Rachel Kellas

16 Week Expiry Date: 07/04/2016

Neighbour Notification  
Expiry Date: 05/02/2016

Neighbour Notification  
Amended/Additional  
Expiry Date: 07/10/2016

Time extension agreed Yes  
to:

Extended expiry date: 01/01/2017

RECOMMENDATION A That, having regard to the environmental information contained in the application, the accompanying Environmental Statement (and addendum), together with proposals for mitigation, subject to the applicant entering into an appropriate legal agreement, within 6 months of the date of the committee resolution to grant planning permission, to secure the provision of/contributions towards: 30% on site affordable housing and market housing mix; education infrastructure, provision of canal basin, SuDS and Foul Water management/maintenance, on site health centre/surgery, public open space provision and maintenance (including sports pitches, pavilion, public art and open space), cycleways, public access, off site highways improvements, travel plan, bus service provision, Community Trust, subject to conditions and subject to referral to the Secretary of State and no receipt of a direction calling-in the application, permission be GRANTED

RECOMMENDATION B That, in the event that the requirements of Recommendation A are not met, permission be REFUSED

## Introduction

The application has been brought before the Joint Planning Committee because the proposal does not fall within the Council's Scheme of Delegation. The application concerns the creation of a new settlement allied to the substantial employment uses within the former aircraft manufacturing buildings at Dunsfold Aerodrome.

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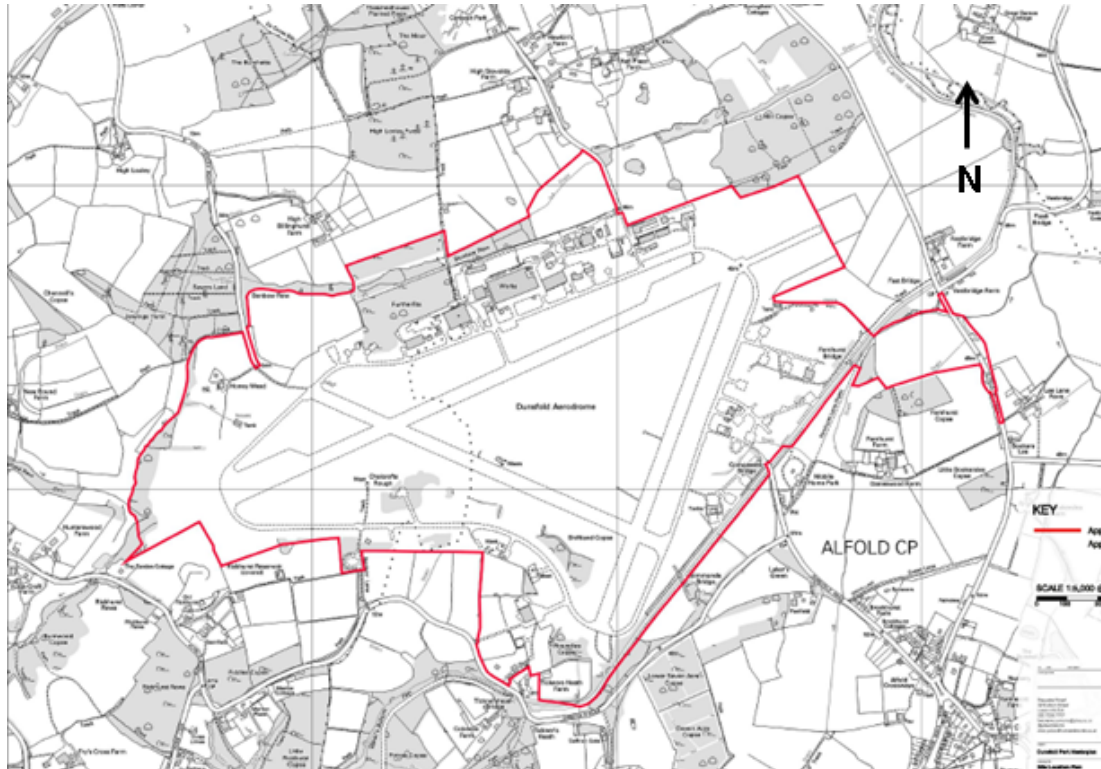
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### Site Description

The application site which measures 248 hectares, is located in a rural area east of the village of Dunsfold, approximately 2.5 km south-west of Cranleigh and is made up of 2 distinct sections, the airfield to the south and the commercial buildings / school to the north. The main aerodrome site is currently an operational airfield with fuelling and ground handling facilities. It also functions as a private motor test track and includes an industrial area.

The nearest large settlements are Guildford (11 miles to the north), Godalming (9.4 miles to the north), Cranleigh (4.3 miles to the north east) and Horsham (11.3 miles to the south east). The site crosses 2 parishes; it 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 location is shown on the following plan:

## Location Plan:



The site is situated close to the A281 road 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 Milford. Currently, vehicular access to Dunsfold Park is through either of two entrances – the main entrance at the northern end of the site off Stovolds Hill that gives access to the B2130 Godalming to Cranleigh Road and to the A281 north, and a secondary entrance at the southern end of the site at Compasses Bridge that gives access to the A281 south at Alfold Crossways. A third vehicular access at Tickner's Heath, on the Dunsfold Road, is not in general use but has been used in connection with special events. 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. The unrestored route of the Wey and Arun Canal runs northeast to southwest within the eastern boundary of the site. There are a number of footpaths running through adjoining rural areas but none of them crosses the aerodrome.

Dunsfold Park itself consists of:

- The open airfield with its runways, perimeter track and surrounding grass areas
- A large complex of buildings to the north
- A cluster of smaller holding and hardstanding 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

The application site is generally flat, with the land to the north sloping up gently. The existing industrial buildings and airfield beyond to the south are located on lower land than the application site, although there is not a significant change in land levels.

The area of land to the east of the canal is mainly agricultural - the western portion of this area is farmed for spring barley, the eastern portion for winter oilseed rape and the field margins are maintained as grass.

### Background and planning history

Dunstable Park has a complex history that is relevant background to the consideration of the recent application:-

Dunstable Aerodrome was established in World War II as a Canadian air force airfield. Planning permission was given in 1951 for the "Erection - repair and flight testing of aircraft" (HM/R4624). In 1958, planning permission was granted for the aerodrome to be used for the erection, repair and flight-testing of aircraft (HM/R9831).

That 1958 permission was refined in 1980 by placing it on a limited timescale (to year 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)

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 Dunstable 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.

Temporary permission was given in 2003 to change the use of the land and buildings to Classes B1 (business), B2 (general industry) & B8 (storage or distribution) 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 Dunstable

Park (WA/2007/0372). Air flight capability at Dunsfold Park is currently controlled by the conditions on planning permission WA/2007/0372.

In 2008, outline permission was sought for a new settlement (WA/2008/0788). Following refusal by the Council, an appeal against this refusal was dismissed by the Inspector and subsequently by the Secretary of State on 24/09/2009, on two principal grounds:

1. That the development would generate a considerable amount of additional road traffic and that this would have a severe and unacceptable impact on an over stretched local road network, and that the scheme would be unsustainable in transport terms;
2. That a decision to allow the proposals to proceed at this stage, prior to the formulation of the LDF, would effectively pre-empt the proper consideration of alternatives as part of the development planning process

Overall, the Secretary of State concluded that the benefits offered by the proposed development would not outweigh its shortcomings and overcome the conflicts with the Development Plan and national policy. The Inspector's Report and Secretary of State's decision are attached at Appendix 2.

Following that decision, further temporary uses have been permitted and are operational including in relation to filming the BBC's Top Gear programme (WA/2009/1754). Additionally, temporary uses have operated under the provision of the General Permitted Development Order Class B, Part 3 (temporary uses of land) including events such as "Wings and Wheels" and "Dad's Day Out".

In 2011, an application (WA/2011/0520) was submitted for a Certificate of Lawfulness of existing use (under Section 191 of the Town Country Planning Act) for the use of the application land as an aerodrome for aviation activities, without condition, restriction or limitation as to the level/amount of flying/aircraft. This sought, inter alia, to establish a lawful use for the aerodrome for unrestricted flying purposes. The Certificate was refused and a subsequent appeal dismissed. The Inspector's conclusions on the appeal were, in summary:

- The normal use of the aerodrome in 1948 was for maintenance, repair and reassembly of aircraft, with associated ancillary uses including offices, flight testing, and flying facilities;
- That a permanent permission was granted for a change of use in 1951 to include flight testing as part of the primary mixed use (HM/R4624);
- When the current applicants took over the site from BAe in 2002 a new chapter in the planning history began which was outside of the scope of the 1951 permission, but that was, and is still, subject to temporary permissions expiring in 2018;



- The dismissed appeal decision was challenged in the High Court on 9/04/2014. The Judge concluded that a lawful use for unrestricted flying had not been demonstrated and the original appeal decision was upheld.

The current and lawful use of the aerodrome is for purposes within Classes B1 (Business), B2 (General industrial), B8 (Storage or Distribution) (as defined by the Town and Country Planning (Use Classes) Order 1987 as amended, including outside storage together with air flight capability ancillary to those uses (WA/2007/0372). In addition, this includes a number of temporary uses concurrent with the 2007 permission.

The 2007 and temporary permissions remain in place up until 1 June 2018. From this point, and taking account the Inspector's conclusions in respect of WA/2011/0520, the use of the site would lawfully revert to the repair, maintenance and flight testing of aircraft associated with HM/R4624 dated 13/04/1951. Accordingly, the Council could enforce the cessation of the temporary uses after 2018, although the expediency of such action, given the longevity of their operation on the site, would need to be carefully considered by the Council in the interests of proportionality and reasonableness, particularly pending agreement of the long term strategy for the site.

The underlying lawfulness is for repair, reassembly and flight testing of aircraft, with associated works including offices, and flying facilities pursuant to the 1951 permission. In conjunction with that, the 2015 Planning Permission (WA/2015/0695) for employment purposes for the erection of 6 buildings to provide for 9,966 sqm of B1(b), B1(c) B2 and/or B8 flexible use floorspace with associated works, is a permanent permission and would remain in place after 2018.

### Proposal

This is a hybrid planning application.

Outline permission is sought for the proposed new mixed use settlement to include the following:

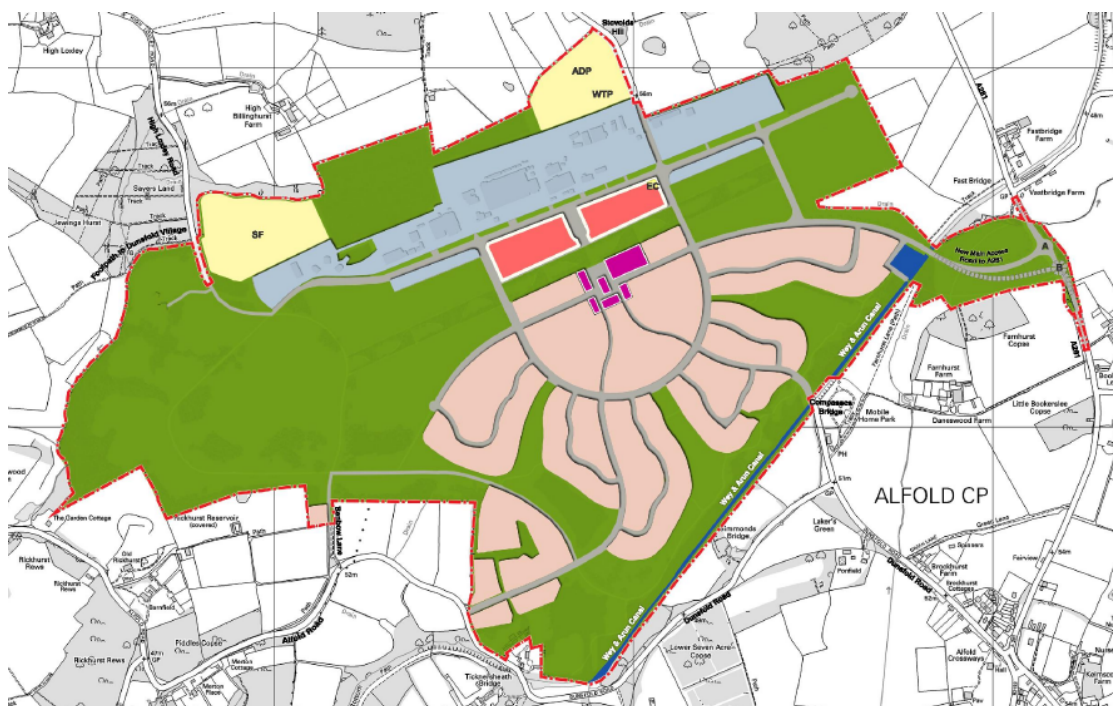
- 1,800 dwelling units (Use Class C3)
- 7,500 sqm care accommodation (Use Class C2);
- A local centre to comprise retail, financial and professional, cafés/ restaurant/ takeaway and/or public house up to a total of 2,150 sqm (Use Classes A1, A2, A3, A4, A5);
- New business uses including offices, and research and development industry (Use Classes B1a and B1b) up to a maximum of 3,700 sqm; light and general industry (Use Classes B1c and B2) up to a maximum of 7,500 sqm; storage and distribution (Use Class B8) up to a

maximum of 11,000 sqm; a further 9,966 sqm of flexible commercial space (B1(b), B1(c), B2 and/or B8);

- Non-residential institutions including health centre, relocation of existing Jigsaw School into new premises and provision of new community centre (Use Class D1) up to a maximum of 9,750 sqm; a two-form entry Primary School;
- Open space including water bodies, outdoor sports, recreational facilities, canal basin and nature conservation areas; public transport routes, footpaths and cycleways; landscaping;
- The removal of three runways; all related infrastructure including roads, car and cycle parking, energy plant and associated equipment, water supply, telecommunications, drainage systems and waste water treatment facilities;

Indicative land uses plan:

Residential Commercial Mixed use village centre Educational campus Energy  
Open space, recreation and landscape



Full permission is sought for the permanent change of use of existing commercial buildings on site, which make up the existing business park. Permission for the temporary use of these buildings for flexible Class B1 Business, B2 General Industrial, and B8 Storage or Distribution uses currently exists up until April 2018 to include the following:

- Demolition of 8,029 sqm of existing buildings
- Retention of 36,692 sqm of existing buildings – the uses of these buildings are set out in the below table

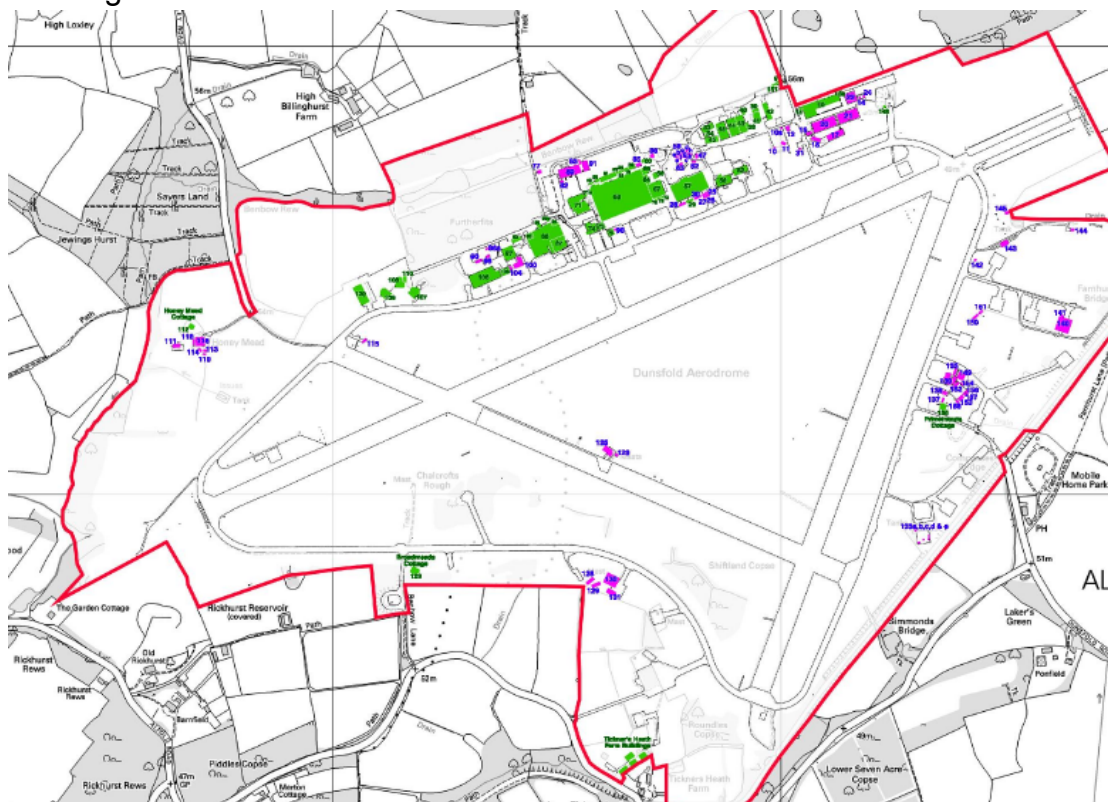
- Temporary use of Building 132 for a construction headquarters.

In relation to the full part of the application, the proposed future uses for the existing buildings to be retained are summarised in the following table:

	Demolished (sqm)	Retained (sqm)
B1 Use	496	6,824.1
B1 and/or B2 and/or B8 use	1447.2	1,542.9
B1c and/or B2 and/or B8 use	3157.3	24,098.5
B8 use	421.4	1,466.1
Ancillary – whole site	277.5	1,051.6
Ancillary – on site staff	265.4	1,211.5
Not part of the temporary application (Jigsaw buildings)	1929.7	497.4
Total	7994.5	36692.1

A full schedule of all existing buildings describing those to be demolished along with those to be retained and their proposed permanent use is included at Appendix 1 to this agenda.

**Buildings for retention/demolition\*:**



\*Buildings to be retained are shown in **Green**, buildings to be demolished are shown in **Pink**

This application is accompanied by an Environmental Statement which includes chapters on the following topics:

- Ecology and Nature Conservation
- Landscape and Visual Amenity
- Cultural Heritage and Archaeology
- Land Quality and Hydrogeology
- Hydrology and Water Resources
- Access, Traffic and Transport
- Air Quality and Odour
- Noise and Vibration
- Social and Community Wellbeing
- Economic Issues
- Cumulative Impacts

### Heads of Terms

#### Highways

##### Section 278 Legal Agreement(s):

- Before occupation of 100 houses, improvements to the signalised junction of A281/B2130 Elmbridge Road, to include provision for cyclists and buses.
- Before occupation of 100 houses, the provision of a right turn lane at the junction of A281/Barrihurst Lane
- Before occupation of 100 residential units constructed pursuant to the planning permission, the provision of Rights of Way route improvements to construct a Dunsfold Park to Cranleigh Cycleway and a Dunsfold Park to Dunsfold Village Cycleway
- Before occupation of 500 houses, the provision of traffic signals at the junction of Station Road/Snowdenham Lane/ A281 Bramley, to include provision for cyclists and bus priority,
- Before completion of 500 houses, the construction of a roundabout at the junction of Broadford Road/A281 to include provision for pedestrians, and cyclists, the improvement of the existing roundabout at the junction of A281/Kings Road, to include provision for pedestrians and cyclists, and the improvement of the road link between those two junctions

##### Section 106 Legal Agreement

1. Provision of a Community Trust to deliver, inter-alia, the full procurement, running in perpetuity, management and review of the Bus Services secured below.

Provide for a high quality bus service to serve the development, comprising:

From the first occupation of the 50<sup>th</sup> residential unit;

- A flexible service designed around the needs of new residents and existing employees on site

From the first occupation of the 100<sup>th</sup> residential unit;

- An hourly service to be provided between the Development and each of Guildford and Godalming in both directions. A half hourly service provided between the Development and Cranleigh in both directions. The half hourly services to be made available between the hours of 07.00 and 19.00 Monday to Saturday, with an hourly service to run between 06.00 – 07.00, 19.00 – 23.00 Monday to Saturday, and 08.00 to 20.00 on Sundays/appropriate public holidays.

From the first occupation of the 400<sup>th</sup> residential unit;

- A half hourly service on each of the routes serving Guildford and Godalming in both directions. A half hourly service between the development site and Cranleigh in both directions. These half hourly services to be made available between the hours of 06.00 to 19.00 Monday to Saturday, with the hourly services operating between 19.00 – 23.00 Monday to Saturday, and 08.00 – 20.00 on Sundays/appropriate Public Holidays.

From the first occupation of 1,100<sup>th</sup> residential unit;

- A half hourly service on each of the routes serving Guildford, Godalming and Horsham in both directions. A 15 minute service between the development site and Cranleigh in both directions. The services to be made available between the hours of 07.00 to 19.00 Monday to Saturday. An hourly service to be provided during the hours of 06.00 – 07.00, 19.00 to 23.00 Mondays to Saturdays, and 08.00 to 20.00 on Sundays/appropriate Public Holidays on the Guildford, Godalming and Horsham Routes, and a 30 minute service between the site and Cranleigh.
- When the site is fully built out, this will lead to peak hour frequencies of: 15 minute to/from Cranleigh; 30 minute to/from Guildford; 30 minutes to/from Godalming and Horsham.

The provision of appropriate bus stop infrastructure within the site, to provide high quality shelters, stops, under-cover cycle parking, RTPI, smart ticketing, and bus priority measures where appropriate.

2. Prior to the occupation of the 1<sup>st</sup> residential unit constructed pursuant to the planning permission, to pay to the County Council a contribution of £50,000 towards the funding of a study, public consultation, committee consideration of TRO's, and any implementation of any resultant measures to traffic manage and/or close roads to prevent through traffic using Alfold Road and Wildwood Lane, other than cyclists and buses.
3. Prior to occupation of the 500<sup>th</sup> residential unit constructed pursuant to the planning permission to pay to the County Council a contribution of £2,600,000 towards the following transport mitigation measures
  - Junction / link improvements on the local highway network as covered by the Transport Assessment (including the Downs Link), additional to those required in kind.
  - Traffic calming on A281 in Bramley Village High Street
  - HGV management measures in lanes in the vicinity of the development
4. To pay a contribution of £5,000,000 to the County Council towards transport mitigation in the Borough of Guildford, for edge of/out of town centre parking measures and road capacity headroom production measures on the southern approach corridors to the town, in the following instalments;
  - Prior to the completion of the 450<sup>th</sup> residential unit constructed pursuant to the planning permission to pay £1,250,000
  - Prior to the completion of the 900<sup>th</sup> residential unit constructed pursuant to the planning permission to pay £1,250,000
  - Prior to the completion of the 1350<sup>th</sup> residential unit constructed pursuant to the planning permission to pay £1,250,000
  - Prior to the completion of the 1500<sup>th</sup> residential unit constructed pursuant to the planning permission to pay £1,250,000
5. Prior to completion of the 500<sup>th</sup> residential unit constructed pursuant to the planning permission to pay a contribution of £200,000 to the County Council towards the rights of way improvements.
6. Prior to the completion of the 501<sup>st</sup> residential unit (house or flat), the construction of the roundabout junction of Broadford Road/A281 to include provision for pedestrians, cyclists and buses, the improvement of the existing roundabout at the junction of A281/Kings Road, to include provision for pedestrians, cyclists and buses, and the improvement of the road link between the two junctions.

7. Payment of £60,000 for the Unforeseen Transport Impacts Fund, the Monitor and Manage Fund and the Travel Plan Contingency Fund.
8. In the event that the junction improvement required in Condition 28 cannot be delivered, the payment of a sum of money equal to the value of the full cost of delivering that junction at the trigger time, in lieu of its provision in kind, to deliver alternative mitigation in Bramley
9. Prior to commencement of development, providing for governance of the funds in 8 above and the establishment and administration of the Transport Review Group.
10. Prior to commencement of development, to provide the funding of a Travel Plan Manager through the implementation of the Travel Plan
11. To fully implement, review, and update the site wide and individual land use/occupier travel plans, in accordance with timescales to be agreed with the Local Planning Authority, to include:
  - bespoke personalised travel planning for every residential unit constructed as part of the planning permission upon first occupation. To provide personalised travel planning for each employee of the new commercial units constructed as part of the development on the site on an on-going perpetual basis. To be funded by DAL and commercial occupiers where relevant.
  - the provision and on-going maintenance of Bicycle Hire facilities and the promotion of discount vouchers for the purchase price of new bikes, to be funded by DAL through the Travel Plan.
  - The provision and maintenance of Electric vehicle charging points in accordance with SCC's Parking Guidance throughout the site.
  - Car club provision, for all occupiers of the site (residential, commercial, educational and leisure)
  - The provision of welcome packs to include funded bus vouchers for the first occupier of a residential unit constructed pursuant to the planning permission.

- the provision and maintenance of web site and related technology<sup>1</sup>.
- The establishment and maintenance of a site wide car sharing scheme for perpetuity.
- the agreement and establishment of a regular monitoring, reporting and modifying programme to feed into 14 below, and inform the decisions of the Transport Review Group.

12. Provision and maintenance of Electric vehicle charging points throughout the site and car club provision, to be funded through the endowed income generated asset owned by the trust.

#### Affordable & Market housing mix

- Provision of 30% affordable homes
- Affordable Housing Tenure split – 50% shared ownership and 50% rented
- Delivery through phases
- Review mechanism
- Specific mix of both affordable and market dwelling to be agreed prior to approval of relevant reserved matter phase (to include self-build and custom build housing as required).

#### Education

- Early years' provision on-site - request that the developer provides early years' accommodation in three rooms on the primary school site and increases the accommodation for Little Harriers
- Provision of a two form Primary school – on site
- Secondary education – financial contribution towards modifications of Glebelands School - £3,345,385

#### Public Open Space

Provision of:

- Public art
- Open space
- Management and maintenance
- Public access
- Footpath links
- Provision of canal basin

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<sup>1</sup> The nature of the requirements will change over time eg. smart phone technology is replacing equivalent technology in houses. These should be considered in the travel plan.



## Play Provision

- 1.08 ha of equipped play space through a combination of LAPs, LEAPs and NEAPs.
- 1.296 ha of outdoor provision of a skate/bmx/biking area and also MUGAs (Multi Use Games Areas). Potentially some of this provision could be located in the Country Park, the provision of a bike park/dirt jumping area could be a consideration
- 2.376 ha of informal play space (based on 0.55 ha/1000) through provision of LAPs and areas around equipped playgrounds/facilities such as general green space through out the development site
- Adequate signage

## Sports Facilities

- Grass pitches; 1 adult pitch, 2 youth pitches and 3 mini football pitches with adequate surface water drainage, self weighted rollaway goals and changing facilities and carpark
- 1 floodlit all weather pitch 3G/4G with adequate changing facilities, goals and carpark
- 1 Cricket Wicket, Cricket Outfield, adequate sport field drainage, Sight Screens, 2 lane Practice net and Pavilion/Changing facility and carpark
- Shared use pavilion for the summer and winter sports, that provides the changing facility standards/grading required by the FA/ECB.
- Hard Surface tennis courts, minimum 2 No; probably best near to a community centre
- Trim Trails located in green corridor/open space area
- Outdoor Gym centred centrally somewhere maybe near a community centre

## Country Park, Woodlands & Water Courses

### Leisure provision

- £779,620 contribution towards replacement leisure centre in Cranleigh (an oral update is to be provided on this matter).

### Phasing

- Requirement for a detailed phasing to be included
- Delivery of relevant infrastructure
- Design review stages

### SuDS

- Management, maintenance and financial responsibility

### Package Treatment plant

- Management, maintenance and financial responsibility
- Transfer of plant to utility provider or management company

### Community Facilities

Provision of Community facility and village centre (buildings for A1 (shops) A2 (financial and professional services) A3 (restaurants and cafes), A4 (drinking establishments), and A5 (hot food takeaways)).

### Health centre / GP Surgery

- On-site provision of new facility – specification to be confirmed by Guildford and Waverley CCG

### Surrey Police

- Financial contribution of £115.72 per dwelling towards the provision of police infrastructure, to be used in the policing of the new settlement at Dunsfold Park

- Submitted documents

Planning Statement	Environmental Statement Volume 2 (ES Figures)
Design and Access Statement	Environmental Statement Volume 3 (Technical Appendices)
Parameter Plans and supporting drawings	Environmental Statement Volume 4 (Non Technical Summary)
Retail and Town Centres Statement	Ecology Report (located in ES appendices 7.1 to 7.9)
Sustainability Appraisal	Biodiversity Checklist
Arboricultural Impact Assessment	Flood Risk Assessment (located in ES appendix 11.1)
Statement of Community Involvement	SuDS Proforma
Transport Assessment	
Travel Plan	
Environmental Statement Volume 1 (ES Chapters)	

Heritage Statement (located in ES appendices 9.1 to 9.4)  
Foul Sewerage Statement (located in ES appendix 5.4)  
Utilities Assessment (located in ES appendix 5.5)  
Land Contamination Report (located in ES appendices 10.1 to 10.2)

ES Appendices:

Scoping Opinion  
Demolition Plan  
Outline Sustainability Strategy  
Construction Environment Management Plan  
Drainage Strategy  
Outline Utility Infrastructure Strategy  
Preliminary Operational Waste Strategy  
Obtrusive Light Survey and Assessment  
Habitat and Vegetation Surveys  
Badger Survey Report  
Bat Survey Report  
Dormouse Survey Report  
Breeding Bird Survey Report  
Amphibian and Reptile Survey  
Invertebrate Survey Report  
Off-Site Highway Works Ecology Walkover  
Historic Landscape Character Extract from Dunsfold Park in its Landscape Setting

Off-Site Highway Works Landscape and Visual Effects  
Gazetteer of Cultural Heritage Features  
Archaeological and Historic Background  
Survey and Photographic Record of Significant Airfield Structures  
Phase 1 Land Quality and Hydrogeology/Assessment  
Preliminary Phase 2 Site Investigation  
Report: Dunsfold Park Proposed A281 Link-road  
Flood Risk Assessment  
ADMS-Road Model Inputs  
ADMS Model Inputs  
Onsite Construction Phase Assessment  
ADMS-Roads Model Results  
ADMS Model Results

Additional documents:

Noise Monitoring Information Sheets  
Water Strategy additional information  
Local Centre additional information  
Sustainability Assessment update  
Flood Risk Assessment addendum  
Tree Report  
Transport Assessment update  
Thematic Schedule  
Environmental Statement Addendum

Applicant's Consultation

The application is accompanied by a Statement of Community Involvement (SOCI). The umbrella legislation for consultation on planning applications, the Town and Country Planning (Development Management Procedure) Order 2015 requires this on major applications.

The submitted SOCI states that the following has been carried out in respect of consultation on the application:

Public exhibition on the 1<sup>st</sup> July 2015 at the Cranleigh Arts Centre. The exhibition was advertised by letter to key stakeholders, 951 local addresses surrounding the site and via an advertisement in the local paper. Post exhibition, copies of the exhibition boards have been available to download via the applicant's website [www.dunsfoldpark.com](http://www.dunsfoldpark.com). Briefing letters were also sent to local Ward Members and key stakeholders. The applicants contend that a low number of objections and a majority of supportive comments at a well-attended public exhibition are indicative that there is more support for the scheme than opposition.

Relevant planning history

WA/2016/0634	- Application under Section 73 to vary conditions 1, 2 and 10 of WA/2015/0695 (plan numbers, revised floor area and use) to allow increase in floor area and D1 Use Class.	Full permission 23/08/2016
NMA/2016/0064	Amendment to WA/2015/0695 to provide alterations to elevations to Unit 1 & 2; relocation of units 4 & 6; increase of car parking spaces.	Non-material amendment allowed 20/04/2016
WA/2015/0695	Erection of 6 buildings to provide for 9,966 sqm of B1(b), B1(c), B2 and/or B8 flexible use floorspace with associated parking, servicing, landscaping and works to existing access road following demolition of existing buildings.	Full permission 08/12/2015
WA/2012/0530	Certificate of Lawfulness under Section 191 for use of land for erection, repair and flight testing of aircraft.	Withdrawn 18/11/2015
WA/2012/0512	Application under Section 73 to vary Conditions 7 and 11 of WA/2007/0373 (Change of use of land and buildings for B1 Business, B2 General Industrial, and B8 Storage or Distribution uses) to facilitate additional flights and extended flying hours in connection with the 2012 Olympic Games. Specifically: to amend the total annual number of flights in 2012 to 6,600; to extend the hours of flying to 0700 to 2100 Monday to Sunday, to allow flying	Permitted 04/07/2012  Not implemented – expired

	later on Saturdays and during Sundays; and to remove the restriction in relation to flights being associated with companies of Dunsfold Park; variations relating to hours and the relationship to Dunsfold Park would apply during the period 21 July to 15 August inclusive.	
WA/2012/0511	Application under Section 73 to vary Conditions 8 and 11 of WA/2007/0372 (Change of use of land and buildings for B1 Business, B2 General Industrial and B8 Storage or distribution uses) to facilitate additional flights and extended flying hours in connection with the 2012 Olympic Games. Specifically: to amend the total annual number of flights in 2012 to 6,600; to extend the hours of flying to 0700 to 2100 Monday to Sunday, to allow flying later on Saturdays and during Sundays; and to remove the restriction in relation to flights being associated with companies of Dunsfold Park; variations relating to hours and the relationship to Dunsfold Park would apply during the period 21 July to 15 August inclusive.	Permitted 04/07/2012  Not implemented – expired
WA/2011/2222	Certificate of Lawfulness under Section 191 for use of the application land for flying use.	Withdrawn
WA/2011/2221	Application under Section 191 for use of the application land, the airfield for flying use and the use of the northern area" (as defined) for uses within classes B1 (Business)	Withdrawn
WA/2011/2048	Application under Section 73 to vary Conditions 7 and 11 of WA/2007/0373 (Change of use of land and buildings for B1 Business, B2 General Industrial, and B8 Storage or Distribution uses) to facilitate additional flights and extended flying hours in connection	Approved 17/02/2012  Appeal (in respect of conditions imposed) Allowed 01/06/2012

	with the 2012 Olympic Games. Specifically: to amend the total annual number of flights in 2012 to 6,600 (to provide an additional 1,560 aircraft movements); to extend the hours of flying to 0700 to 2100 Monday to Sunday, to allow flying later on Saturdays and during Sundays; and to remove the restriction relation to flights being associated with companies of Dunsfold Park; Variations relating to extended hours and the relationship to Dunsfold Park would apply during the period 21 July to 15 August inclusive.	Not implemented – expired
WA/2011/2047	Application under Section 73 to vary Conditions 8 and 11 of WA/2007/0372 (Change of use of land and buildings for B1 Business, B2 General Industrial, and B8 Storage or Distribution uses) to facilitate additional flights and extended flying hours in connection with the 2012 Olympic Games. Specifically: to amend the total annual number of flights in 2012 to 6,600 (to provide an additional 1,560 aircraft movements); to extend the hours of flying to 0700 to 2100 Monday to Sunday, to allow flying later on Saturdays and during Sundays; and to remove the restriction relating to flights being associated with companies of Dunsfold Park; Variations relating to extended hours and the relationship to Dunsfold Park would apply during the period 21 July to 15 August inclusive.	Approved 17/02/2012  Appeal (in respect of conditions imposed) Allowed 01/06/2012  Not implemented – expired
WA/2011/0520	Certificate of Lawfulness under Section 191 for use of the application land as an aerodrome for aviation activities, including for the start-up, taxiing, engine testing, ground running, take-off and landing of aircraft, without condition, restriction or limitation as to: Number of aircraft	Certificate of Lawfulness Refused 06/07/2011  Appeal Dismissed 05/04/2012

	<p>Number of take offs and landings</p> <p>Type of aircraft (whether fixed wing or rotary civil or military, commercial or private, training or non-training, and whatever the origin or destination of the flight)</p> <p>Size of aircraft</p> <p>Weight of aircraft</p> <p>Number of crew and passengers</p> <p>Type and amount of freight</p> <p>Duration</p> <p>Period of use (hours, days, nights, weeks, weekends etc)</p> <p>Surface traffic generation</p> <p>Number of employees employed on or off the application land or persons generally on or off the application land</p> <p>Noise, air quality other emissions and environmental effects or otherwise.</p>	<p>High Court</p> <p>Challenge Dismissed</p> <p>09/04/2014</p>
WA/2009/1891	Use of land at Dunsfold aerodrome for filming for a temporary period to co-exist with previous existing permanent and temporary permissions for the site (up to 01/06/2018).	<p>Permitted</p> <p>23/03/2010</p>
WA/2008/0788	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 (1,035 sq.m); A3 Restaurants/Cafes (230 sq.m); A4 Public House (115 sq.m); A5 Take Away (115 sq.m); B1a and B1b Business use including Offices and Research and Development (9,440 sqm); B1c and B2 Light and General Industrial use (6,099 sqm); B8 Storage and Distribution (7,624 sqm); C1 Hotel (7,015 sqm); D1 Non-Residential Institutions including health centre, two	<p>Refused</p> <p>24/09/2008</p> <p>Appeal Dismissed</p> <p>24/09/2009</p>

	schools, place of worship, museum and community centre (9,906 sqm); D2 Assembly and Leisure use including sports centre (2,185 sqm); Monument; combined heat and power plant; together with associated works following demolition of 8, 029 sq.m of existing buildings and removal of runways. Part full application for the Change of Use of 36,692 sq.m 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. (abbreviated description)	
WA/2007/0737	Use of land at Dunsfold Park for filming; this use to co-exist with previous existing permanent and temporary permissions for the site (temporary permission to 30th April 2018). (Duplicate application)	Refused  27/07/2007  Appeal Dismissed 26/08/2008
WA/2007/0736	Use of land at Dunsfold Park for filming; this use to co-exist with previous existing permanent and temporary permissions for the site (temporary permission to 30th April 2018).	Refused  27/07/2007
WA/2007/0729	Use of land at Dunsfold Park for markets; to co-exist with various existing permanent and temporary permissions for the site (temporary period to 30th April 2018) (duplicate application).	Refused  17/07/2007
WA/2007/0728	Use of land at Dunsfold Park for markets to co-exist with various existing permanent and temporary permissions for the site (temporary period to 30th April 2018).	Refused  17/07/2007
WA/2007/0720	Use of land at Dunsfold Park for sport and leisure to co-exist with various existing permanent and temporary permissions for the site (temporary	Refused  17/07/2007



	period to 30th April 2018). (Duplicate application)	
WA/2007/0719	Use of land at Dunsfold Park for sport and leisure to co-exist with various existing permanent and temporary permissions for the site (temporary period to 30th April 2018).	Refused 17/07/2007
WA/2007/0717	Use of land at Dunsfold Park for music concerts, festivals and fairgrounds to co-exist with various existing permanent and temporary permissions for the site (temporary period until 30th April 2018). (Duplicate application)	Refused 17/07/2007 Appeal Dismissed 14/04/2008
WA/2007/0716	Use of land at Dunsfold Park for music concerts, festivals and fairgrounds to co-exist with various existing permanent and temporary permissions for the site (temporary period until 30th April 2018).	Refused 17/07/2007
WA/2007/0373	Change of use of buildings and land at Dunsfold Park for a temporary period to 30th April 2018, to co-exist with extant temporary and permanent permissions. (Duplicate Application).	Appeal (non determination) Allowed 18/06/2008
WA/2007/0372	Change of use of buildings and land for B1 Business, B2 General Industrial, and B8 uses for a temporary period to 30 <sup>th</sup> April 2018 to co-exist with extant temporary and permanent permissions.	Full permission 11/03/2008
WA/2004/0880	Variation or removal of Conditions 1, 2, 3, 5, 7, 8, 11, 14, 15, 19, 20 and 21 of WA/2002/2046.	Permitted 07/01/2005
WA/2002/2046	Change of use of land and buildings at Dunsfold Aerodrome to B1 (office/light industrial) B2 (general industrial) B8 (warehouse distribution) including 4.05ha of outdoor storage and ancillary uses all as per schedule; together with air flight capability ancillary to those uses for a temporary period of 2 years (as amplified by letters dated 26/11/02, 23/1/03, 21/2/03, 20/3/03 and 1/4/03 and Transport Assessment dated	Permitted 17/04/2003

	13/2/03).	
WA/2002/1153	Non-compliance with Conditions 3 and 4 of WA99/1913 to allow the use of land and buildings by more than one occupier and for uses other than the assembly, repair and flight testing of aircraft.	Withdrawn  17/10/2002
WA/1999/1925	Removal of condition 6 of WA98/1013. (Condition restricts use of site to manufacturing processes in connection with aircraft by British Aerospace plc.) (amplified by letter dated 10/01/00).	Permitted  25/04/2000
WA/1999/1924	Removal of Condition 6 of WA98/1013 and Condition 7 of WA80/0697. Condition restricts use of site to manufacturing processes in connection with aircraft by British Aerospace (as amplified by letters dated 10/01/00, 01/03/00, 10/03/00 and 16/03/00).	Permitted  25/04/2000
WA/1999/1916	Non compliance with Condition 2 of WA98/1013 and Condition 3 of WA80/0697 to allow use of the site by organisations/persons/firms other than British Aerospace (as amplified by letters dated 10/01/00, 01/03/00, 10/03/00 and 16/03/00).	Permitted  25/04/2000
WA/1999/1915	Non compliance with Condition 2 of WA98/1013 and Condition 3 of WA80/0697 to allow use of the site by organisations/persons/firms other than British Aerospace (as amplified by letters dated 10/01/00, 01/03/00, 10/03/00 and 16/03/00).	Permitted  25/04/2000
WA/1999/1914	Non compliance with Condition 1 of WA98/1013 and Condition 2 of WA80/0697 (restrictive user condition) to allow use by persons other than BAe and to waive the requirement to remove all buildings and installations and returning the land to agriculture use	Permitted  25/04/2000
WA/1999/1913	Non compliance with Condition 1 of WA98/1013 and Condition 2 of	Permitted

	WA80/0697 (restrictive user condition) to allow use by persons other than BAe and to waive the requirement to remove all buildings and installations and returning the land to agriculture use	25/04/2000
HM/R18351	1. Extension to Control Tower 2. Extension to Fire Station and new Control Room	Permitted 08/04/1970
HM/R9831	Use of aerodrome for the erection, repair, and flight testing of aircraft by more than 650 personnel	Permitted 13/06/1958
HM/R9721	Erection of radar tower; TX transmitter house (Radar); C.A.D.F. house (V.H.F.), equipment room above and extension to control tower	Permitted 11/04/1958
HM/R4624	Erection, repair and flight testing of aircraft	Permitted 13/04/1951  *This forms the lawful use for the site post 2018
HM/R21946	Erection of part single and part two storey maintenance building.	Permitted 10/10/1973

#### Planning policy constraints

Countryside beyond the Green Belt – outside of any settlement area

Site of Nature Conservation Importance – land to south of the site

Potentially Contaminated Land

Flood Zone 2 – north-east section of the site

Flood Zone 3 – north-east section of the site

Ancient and Semi-Ancient Woodland

AGLV – north west corner of the site, and borders the site to the north and west

Long Distance Footpath LT11

Wealden Heaths I Special Protection Area (SPA) 5 km Buffer Zone

High Archaeological Potential (small part of site)

Non-designated Heritage Features and Assets

#### Development Plan Policies and Proposals

Saved Policies of the Waverley Borough Local Plan 2002:

C2	Development in the Countryside
C3	Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value
C7	Trees, Woodlands and Hedgerows Policy
C11	Undesignated wildlife sites
C12	Canals and River Corridors
D1	Environmental Implications of Development
D2	Compatibility of Uses
D4	Design and Layout
D5	Nature Conservation
D6	Tree Controls
D7	Trees, Hedgerows and Development
D8	Crime Prevention Policy
D9	Accessibility
D13	Essential Infrastructure
D14	Planning Benefits
H4	Density and Size of Dwellings
H10	Amenity and Play Space
IC1	General Considerations
IC4	Existing Industrial and Commercial Premises
HE3	Development Affecting Listed Buildings or their Setting
HE9	Historic Parks and Gardens
HE12	Historic Landscapes
HE14	Sites and Areas of High Archaeological Potential
HE15	Unidentified Archaeological Sites
LT7	Leisure and Tourist Development with the Countryside
LT11	Walking, Cycling and Horseriding
M1	The Location of Development
M2	The Movement Implications of Development
M4	Provision for Pedestrians
M5	Provision for Cyclists
M14	Car Parking Standards
M9	Provision for People with Disabilities and Mobility Problems
M10	Public Transport and Interchange Facilities
M13	Heavy Goods vehicles
RD9	Agricultural Land

The adopted Local Plan contains no specific policies for the application site but it was envisaged at the time of its preparation that Supplementary Planning Guidance would be prepared at a future date: "The position of Dunsfold Aerodrome continues to change. In view of this, it would be premature to include specific policies in the Plan. It may be appropriate that

Planning Guidance supplementary to Policy C2 and/or a Planning Brief should be prepared at a future date.”

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

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

The Council is in the process of replacing the adopted 2002 Local Plan with a new two part document. Local Plan Part 1 (Strategic Policies and Sites) has evolved from the Core Strategy that was withdrawn from examination in October 2013. Local Plan Part 2 (Non-Strategic Policies and Sites) will follow Part 1. The new Local Plan builds upon the foundations of the Core Strategy, particularly in those areas where the policy/approach is not likely to change significantly. On 19 July 2016, the Council approved the publication of the pre-submission Local Plan Part 1 for its Pre-submission consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Publication itself took place on 19<sup>th</sup> August 2016 and triggered the pre-submission consultation, which finished on 3<sup>rd</sup> October 2016. Following a review of representations received, on 29 December 2016, the Council approved the Pre-Submission Local Plan – Part 1 for submission.

In accordance with paragraph 216 of the NPPF, weight can be given to the draft Local Plan, but the degree to which it can is determined by the stage the Plan has reached and the extent to which there are any unresolved objections to it. It is considered that in general terms significant (but not yet substantial) weight can be given to the published Pre-submission Plan, given the stage it has reached in the plan preparation process. The current intention is for the Plan to be formally submitted for examination in December 2016. It is anticipated that Local Plan Part 1 will be adopted, following examination in September 2017. The weight afforded to the Pre-submission Local Plan Part 1 will increase as the Plan progresses through Examination and onto its adoption in 2017. The weight to be attached to the Plan, and specific policies within it, varies according to any unresolved objections. The report will identify where there are unresolved objections to the emerging plan policies where appropriate.

The following documents were approved for submission:

- Pre-submission Local Plan Part 1: Strategic Policies and Sites
- Sustainability Appraisal Report (2016)
- Habitat Regulations Assessment (2016)
- Statement of the Representations Procedure (2016)

In addition a number of supporting evidence documents were available on the Council's website.

Pre-submission Local Plan Part 1 Policies:

SP1:	Presumption in Favour of Sustainable Development
SP2:	Spatial Strategy
ST1:	Sustainable Transport
ICS1:	Infrastructure and Community Facilities
AHN1:	Affordable Housing on Development Sites
AHN3:	Housing Types and Size
EE1:	New Economic Development
EE2:	Protecting Existing Employment Sites
TCS1:	Town Centres
TCS2:	Local Centres
TCS3:	Neighbourhood and Village Shops
LRC1:	Leisure, Recreation and Cultural Facilities
RE1:	Countryside beyond the Green Belt
RE3:	Landscape Character
TD1:	Townscape and Design
HA1:	Protection of Heritage Assets
NE1:	Biodiversity and Geological Conservation
NE2:	Green and Blue Infrastructure
CC1:	Climate Change
CC2:	Sustainable Construction and Design
CC3:	Renewable Energy Development
CC4:	Flood Risk Management
SS7:	New settlement at Dunsfold Aerodrome

Other guidance and supporting evidence:

- Dunsfold Village Design Statement (2001)
- National Planning Policy Framework (2012)
- National Planning Practice Guidance (2014)
- Land Availability Assessment (2016)
- Five Year Housing Supply (2016)
- West Surrey Strategic Housing Market Assessment (September 2015)
- Affordable Housing Viability Study (2012)
- Waverley Employment Land Review, Atkins Limited, (2016)

- Town Centres Retail Study Update, Chase & Partners, (February 2013)
- Surrey Local Economic Assessment, Surrey Economic Partnership Ltd, (December 2010)
- Waverley Economic Strategy 2015 – 2020
- Internet Sales in the UK and General Impact on Physical Retailing and the Retail Property Market, Chase and Partners, (December 2015)
- Waverley Green Belt Review Parts 1 and 2, AMEC (August 2014)
- Waverley Landscape Study Parts 1 and 2 (August 2014)
- Waverley Borough Council Local Landscape Designation Review, AMEC Environment and Infrastructure UK Limited, (August 2014)
- Waverley Air Quality Action Plan July 2008; (2015 update)
- The Surrey Hills AONB Management Plan –2014 – 2019
- The Surrey Hills AGLV Review 2007
- Surrey Design, Surrey Local Government Association, January 2002
- Constructive Conservation in Practice, Historic England, October 2008
- Conservation Principles, Historic England, April 2008
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services, DEFRA, (2011)
- Biodiversity & Planning in Surrey, Surrey Nature Partnership, (2014)
- Waverley Residential Extensions SPD (October 2010)
- Review of Renewable and Decentralised Energy Potential in South East England, TV Energy & LUC, (2010)
- Waverley Air Quality Action Plan, Waverley Borough Council, (July 2008)
- Making Space for wildlife in a changing climate, Natural England, (2010)
- Future Water, the Government's Water Strategy for England, DEFRA, (February 2008)
- Waverley Borough Council Level 1 Strategic Flood Risk Assessment (update),Capita, (March 2015)
- Waverley Borough Council Level 2 Strategic Flood Risk Assessment, Capita, (August 2016)
- The Wey Catchment Abstraction Management Strategy, Environment Agency, (March 2008)
- Water stressed areas – final classification, Environment Agency (July 2013)
- Waverley Borough Council High Level Water Cycle Study, Capita (August 2016)
- Strategic Highway Assessment, Surrey County Council (August 2016)
- Surrey Transport Plan, Surrey County Council, LTP3: (2011-2026)
- Parking Guidelines, Waverley Borough Council (October 2013)
- Waverley Cycling Plan SPD, Waverley Borough Council,(2005)
- Local Transport Assessment: Stages 1 to 4, Mott MacDonald (2015, 2016)
- Draft Infrastructure Delivery Plan, Waverley Borough Council (August 2016)

- Vehicular and Cycle Parking Guidance, Surrey County Council (January 2012)
- Surrey Infrastructure Study, Aecom (January 2016)
- Waverley Local Plan Part 1: Habitats Regulations Assessment, Aecom (2016)
- Sustainability Appraisal Report for the Waverly Borough Local Plan Part 1, Aecom (August 2016)
- Waverley Settlement Hierarchy Update, Waverley Borough Council (2012)
- Action for Cranleigh: Report of the Cranleigh Healthcheck 2002/2003. Cranleigh Parish Council (Reviewed 2008/9 but not published)
- Draft Waverley Cultural Strategy, Waverley Borough Council (update 2016)
- Open Space, Sport, Leisure and Recreation (PPG17) Study, Waverley Borough Council (2012)
- Waverley Playing Pitch Strategy (March 2013)
- Waverley Play Areas Strategy 2015 – 2024
- Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard England. Fields in Trust (2015)
- Mott MacDonald Transport Report Stages 1-4 (2016)
- Aviation Study (2011)

Consultations and Parish Council Comments

<p>Surrey Hills AONB Board</p>	<p>Object -</p> <p>The considerable amount of additional road traffic generated by the new settlement when added to other recent and planned developments on an overstretched local network would cause more motorists to use relatively quiet Surrey Hills country lanes.</p> <p>The remote location of the proposed settlement continues to be unsustainable as concluded by a Planning Inspector and Secretary of State in 2009.</p> <p>The principle of a new settlement should more properly be considered in the context of the shortly to be published pre-submission Local Plan Part 1 rather the grant in advance of an ad hoc planning permission</p> <p>The relatively tranquil Surrey Hills lanes would be affected by likely significant increases in traffic</p>
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	<p>The Planning Appeal Inspector's conclusion in 2009 that the then proposed development would appear like a village and not be obtrusive in views from the AONB was a value judgement with which many would now disagree.</p> <p>Any mitigation would need to provide significant traffic management measures across many of the Surrey Hills quiet lanes sufficient to deter motorists diverting from the congested A.281.</p>
Auto-Cycle Union Ltd	No comment received.
British Driving Society	No comment received.
British Horse Society	<p>Objection</p> <p>The development takes no account of the negative impact of increased traffic and population on the local equestrian community.</p> <p>The application makes no mention of the need to improve the surface and drainage of the surrounding bridleways to cope with the increased pedestrian and cycling use which will result from such a large development.</p> <p>The application intends to use part of Bridleway 400 as an access road to the site. If the bridleway (which forms part of the Wey South Path) is to be turned into a road, then horse riders will encounter motor vehicles. Horses and traffic do not mix well. Some riders will be deterred, for safety reasons, from using the bridleway, and therefore lose access to the remainder of the hacking described above. The Ramblers comment that BW400 will be diverted under the new bridge by the new canal basin highlights a concern; that this needs to be very carefully constructed.</p> <p>At any points where cyclists may join the bridleways from the site, it is important that (a) sightlines are generous, including allowing for the height of a rider on a horse, and (b) speed of joining cycles is kept down, to avoid accidents.</p> <p>Historic maps of the site show that many lanes stop at the edge of the airfield. Clearly these were once heath roads which crisscrossed what was historically a common. These include: Stovolds Hill, Loxley Road, Benbow Lane off the</p>

	<p>Alfold Road/Dunsfold Road and Satchel Court. The development could be considerably enhanced by the inclusion of a perimeter bridleway around the outside of the site. A width of 5m would be sufficient to allow the reconnection of these historic highways and provide pedestrian, cycle and equine access to the surrounding countryside and connecting bridleways.</p> <p>Horses and traffic mix badly.</p>
Byways & Bridleways Trust	No comments received
Chief Property Officer - SCC	No comments received.
Civil Aviation Authority	No comments received
Cyclists Touring Club	No comments received
Environment Agency South East	<p>Original response:</p> <p>Have reviewed the documents listed below and in the absence of an acceptable Flood Risk Assessment objects.</p> <p>The FRA dated November 2015 produced by Mott McDonald submitted with this application does not comply with the requirements set out in paragraph 30 part 7 of the Planning Practice Guidance to the National Planning Policy Framework (NPPF). The submitted FRA does not therefore provide a suitable basis for an assessment to be made of the flood risk arising from the proposed development. In particular, the submitted FRA fails to demonstrate: 1. The loss of flood plain storage within the 1 in 100 with an appropriate allowance for climate change flood extent caused by the proposed development can be mitigated for.</p> <p>The applicant can overcome the objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase flood risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved EA likely to maintain its objection to the application. Production of an FRA will not in itself result in the removal of an objection.</p>

	<p>Additional response:</p> <p>Satisfied that, following the submission of the additional flood risk information, the flood water storage compensation measures could be secured by an appropriate planning condition.</p> <p>Objects on the basis it may have a significant adverse impact on water quality, and for the following reasons:</p> <ul style="list-style-type: none"> <li>- Only limited information has been submitted relating to the issue of water quality. The application does not provide a sufficient basis for an assessment to be made of the risks of pollution to the water environment (surface water and ground water) arising from the proposed development.</li> <li>- Fails to assess the impacts of the proposed new sewage treatment works discharging treated effluent to the Wey &amp; Arun Canal, which will subsequently discharge in Cranleigh Waters. Discharging to a canal is not recommended due to slower water flows and could result in eutrophication and pollution.</li> <li>- The proposal would cause deterioration of a quality element to a lower status and/or prevent the recovery of Cranleigh Waters water body.</li> </ul> <p>In order to overcome the objections, further assessment of the risks and potential mitigation measures is required.</p> <p>Final comments to be reported orally.</p>
Council's Environmental Health - Air Quality Officer	<p>Conditions recommended on air quality, contaminated land, noise, vibration and light, air quality and odour.</p>
Council's Environmental Health - Contaminated Land Officer	<p>Matter of monitoring air quality in surrounding villages also raised. Possible inclusion in S106 to ensure mitigation if additional traffic results in adverse impact on air quality from increased vehicles.</p>
Council's Environmental Health Other Issues	
Forestry	<p>Refer the LPA to standing advice.</p>

Commission	LPA need to be satisfied that all other options for the access have been exhausted and therefore not available. Also provision of the canal basin results in additional trees, which is avoidable.
Guildford & Waverley Clinical Commissioning Group	<p>A health facility would be needed. The plans should look to build an integrated community/primary care facility through a modular route. i.e. build a core centre first which has the capability to be expanded as the development progresses.</p> <p>There is capacity across the nearest practices in Cranleigh and Chiddingfold to support the development from a GP perspective, with some expansion of primary and community staffing.</p>
Guildford Borough Council (GBC)	<p>Impact on the Guildford gyratory should be considered. Mitigation at A281/A248 Shalford junctions would require approximately 3,100 sqm of Common Land in GBC ownership.</p> <ol style="list-style-type: none"> <li>1. Are traffic signals the only option? - e.g. could an enlarged roundabout and new roundabout at A248 Broadfield Road reduce the amount of Common Land required</li> <li>2. Why does the traffic distribution assign no development traffic on the A248 Broadford Road or the A248 Kings Road despite these routes forming part of an 'unofficial' southern bypass of Guildford which could be a more convenient route to travel to the A25 or to access the A3 at Compton.</li> <li>3. The traffic flow diagrams in the Appendix P for the A281 only show 3 hour traffic flows for the morning and evening periods. Considers that Vectos should provide peak hour flows so that GBC can take a view on the impact of traffic on the A281 and the surrounding roads within its boundary in peak hour traffic conditions.</li> <li>4. Not able to review the Paramics model assessment of this junction without having access to the geometric parameters and signal timings.</li> </ol> <p>Amended scheme:</p> <p>Following review of the replacement Transport Assessment, the following comments are made:</p> <p>A281/A248 Shalford junctions:</p>

1. The proposed junction improvement shown in Appendix E is incorrect and should show a roundabout junction improvement, rather than signalised junction. The applicant should clarify this so the consultation includes the correct layout and GBC can understand how much common land would be required.
2. Note an element of development traffic now assigned to the A248 Broadford Road, not A248 Kings Road.
3. The TA contains peak hour traffic flow diagrams, so can now understand the proposed traffic increase onto the A281.
4. Have not been able to review the Paramics model assessment as further details have not been made available.

If Surrey County Council is able to accept that the junction improvement proposed at the A281/A248 Shalford junctions is able to mitigate against the impact of the development, then GBC advises any widening required outside the highway boundary would require Common Land which is under the ownership of GBC.

Request any requirement for the improvement of these junctions to be secured by way of Grampian condition as the improvements are external to the WBC area.

Guildford Gyratory:

Disappointed the applicant has not undertaken any further work on assessing the impact of the planning application on the operation of the gyratory. The Assessment does not acknowledge that the increase in traffic flows on the A281 Millbrook approach would be significantly higher than 6%, between 11 and 17% depending on the direction of travel and peak hour analysed. The gyratory currently operates at or close to capacity during peak periods.

Question what 'extensive plans' are proposed for the gyratory.

GBC's view remains that the replacement TA has not adequately assessed the impact of the planning application

on the Guildford gyratory. However, given the discussions that are being held between SCC and the applicant with regard to measures which form part of the emerging transport strategy for Guildford town centre. GBC is prepared to accept that investment in these measures could mitigate the impact on the Guildford gyratory. The mitigation would be provided by the interception of some development traffic before it passes through the gyratory, and extracting other non-development traffic which would otherwise pass through the gyratory. The latter would allow for the gyratory to accommodate the remaining development traffic during peak hours.

If a £5million Section 106 contribution can be secured for investment in mitigation measures, GBC would accept that the applicant is not further required to assess the impact of the planning application on the Guildford gyratory. However, given the discussions are ongoing, GBC cannot withdraw their objection at this stage.

Updated response:

Guildford Borough Council has now obtained Counsel's Opinion on the correct process for delivering the Shalford highway improvements. Counsel has confirmed Guildford Borough Council's view that these works cannot be delivered through the Scheme of Regulation, however, they can be delivered through one of the following routes.

1. The land could be released through a Section 16 application to de-register the common. This application would be subject to public consultation. Applications that require this amount of land take from a common normally includes a requirement for exchange land to be provided; this land cannot be existing public open space and it is not clear whether suitable exchange land is available or the implications for the success of the Section 16 application should exchange land not be available.
2. Surrey County Council (SCC) could compulsory purchase the land. The transfer of the land

	<p>would negate the need for the Section 16 application as the Order would override these rights. This does, however, add risk to Surrey County Council as it is not certain what the value of the land would be and both parties will need to seek their own independent valuation advice.</p> <p>Counsel did confirm that planning permission was not required for the highway works as they would benefit from deemed consent by virtue of Part 9 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015, as amended.</p> <p>In light of the above, in addition to the Grampian condition, Guildford Borough Council further requests that a suitably worded positive and negative planning obligation is secured to ensure that the development cannot proceed past 500 units without the proposed highway works being completed and operational. This adds additional security to the proposed condition. This could also include triggers requiring the deregistration or compulsory purchase of the common land at an earlier stage. Guildford Borough Council would also like to be party to the legal agreement and would welcome the opportunity to comment on the draft conditions and the draft Legal Agreement.</p>
<p>Health and Safety Executive</p>	<p>Confirmed that the site does not lie within the consultation distance (CD) of a major hazard site or major hazard pipeline.</p>
<p>Health Watch</p>	<p>No comments received.</p>
<p>Highways England</p>	<p>No objection, with the following comments made:</p> <p>Pedestrian and cycle links:  The proposed traffic-free cycle ways connecting the development to local area would cater for local movements which would likely be for leisure trips, so would be unlikely to have any significant impact on wider trips to key destinations. This is due to the remote location of the site and its distance to both key employment areas and shopping destinations.</p> <p>Sustainable Transport Strategy:</p>

	<p>A bus service would be provided on three routes to the nearest towns of Guildford, Godalming, Horsham and Cranleigh. The frequencies would provide an opportunity for local trips to be made by public transport. Although they are unlikely to have an impact on the trips onto the strategic road network, they may go some way to reduce localised impacts on the highway network.</p> <p>Trip rates: Table 7.1 on page 58 of the Transport Assessment lists multi modal residential TRICS sites included are neighbourhood centre/edge of town and suburban locations. Given that Dunsfold Park is in a rural location, suburban sites would seem inappropriate to generate the likely number of trips from the site. It is noted that local sites have been identified but their exact setting location may result in lower vehicular trip rates than a location such as Dunsfold Park.</p> <p>Impact on the highway network: It is not clear from this section of the Transport Assessment which highway models have been used. Assume that the Surrey County Council SINTRAM model has been used for all strategic highway assessments. As there is no alternative strategic highway model for the areas, SINTRAM is the most appropriate tool currently available.</p> <p>Impact on the A3: A very brief assessment has been undertaken to understand the impacts of the development on the A3. The section between B3000 Puttenham Heath Road and Guildford currently experiences congestion.</p> <p>Although the previous comments in relation to the validity of the trip rates being applied may result in a lower quantum of vehicular trips being modelled, any impact is unlikely to have a material impact to the safe and efficient operation of the A3. However, if further mitigation proposals are identified on the local road network, there could be direct or indirect impacts to the A3, therefore recommends early engagement with Highways England to assess deliverability.</p> <p>Summary:</p>
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	<p>The likely trip generation from the development onto the strategic road network (SRN) is unlikely to adversely impact Highways England's network. In addition, the overall distance from the A3 means there may be a material impact on the local highway network, which could ultimately have a material impact on the SRN. Therefore, any mitigation locally needs to be planned with this in mind.</p> <p>No objection is raised to the development as currently presented, although if further mitigation is proposed, Highways England should be re-consulted.</p> <p>Recommends that the development of a site wide travel plan and construction management plan is conditioned as part of any planning permission.</p>
<p>Historic England</p>	<p>Original response:</p> <p>Recommends that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.</p> <p>Given that the paved runways and the associated openness of the flying field remains largely intact, such that its character as an airfield remains legible and some wartime buildings remain, therefore assess that Dunsfold should be regarded as an undesignated heritage asset under the terms of the NPPF.</p> <p>This site misses an opportunity to create a new settlement which acknowledges and celebrates the site's layout and historic character.</p> <p>Additional response:</p> <p>Does not wish to comment in detail, but offers the following general observation:</p> <p>Note that Historic England has received an application to consider the building known as Primeads for designation. Any aspect of the proposal that would be affected by a new designation should be deferred for consideration until such a time as that assessment has been made.</p>
<p>Horsham District Council</p>	<p>No objection – subject to compliance with relevant policies and no adverse impact upon the District as a result of the</p>

	additional traffic
Lead Local Flood Authority (Surrey County Council)	<p>Original scheme:</p> <p>Cannot recommend that planning permission be granted because the proposed surface water strategy does not comply with the requirements laid out under the Technical Standards. To overcome this, the following needs to be supplied:</p> <p>Drainage calculations: The calculated value of QBAR and Greenfield runoff calculations are based on a site area of 136 hectares, it is unclear what this value relates to, the positively contributing area should be used. This value should be used in the Greenfield runoff calculations and discharge from the site restricted to appropriate Greenfield rate. In addition, the pond volumes stated within the Drainage Strategy relate to the smaller summer events, not the critical winter events.</p> <p>Conditions recommended for other matters.</p> <p>Amended scheme:</p> <p>Satisfied that the proposed drainage scheme meets the requirements set out within the NPPF, NPPG and Non-statutory Technical Standards for SuDS and recommends that permission is granted subject to suitably worded conditions to ensure the SuDS scheme is properly designed, implemented and maintained throughout the lifetime of the development.</p> <p>Further suggests informatives on any permission granted with regard to other consents that may be required outside of the planning system.</p>
Local Economic Partnership (Enterprise M3)	<p>Enterprise M3 Local Enterprise Partnership supports in principle the development of Dunsfold as a housing/mixed-use development site. Our focus on key places is set out in our recent Local Growth Deal submission to Government. Our ambition is to encourage and promote mixed-use development through investment in unblocking housing sites that will support many of the smaller housebuilders to build houses in an area where demand is at its highest.</p>

	<p>Having considered the proposed site in Dunsfold, whilst there is clearly work to be done to fully assess the transport implications of the development; the LEP believes that these can be addressed and that the application should be supported.</p>
Mole Valley District Council	No comments received.
National Planning Casework Unit	<p>Original scheme:</p> <p>No comments and confirmed no requests to call-in at this stage.</p> <p>Amended scheme:</p> <p>Confirms that requests from third parties have been received to call-in the application. Should the committee resolve to approve the application, the NCPU would at that time review the requests with the aim of making a recommendation to the Secretary of State on whether the case should be called in for his own determination.</p>
National Trust	<p>Objects:</p> <p>Considers the determination of such a substantial development– delivering 3.5 years of the Borough’s total housing supply – in advance of the new local plan would undermine the principles of such a plan-led system. The case for a new settlement at Dunsfold Aerodrome should be examined by a Local Plan Inspector in the context of the local plan as a whole. A point noted by the Secretary of State (SoS) in 2009 that “to allow the proposals to proceed at this stage, prior to the formulation of the LDF, would effectively pre-empt the proper consideration of alternatives as part of the development planning process” (para 37).</p> <p>AONB:</p> <p>The National Trust is therefore concerned that the proposed development will generate a significant amount of additional road traffic which when added to other recent and planned developments on an overstretched local highway network would cause more motorists to use relatively quiet Surrey Hills country lanes having a severe</p>

	<p>adverse impact on the protected character and tranquillity of extensive parts of the Surrey Hills AONB contrary to NPPF policy, saved policy C3 of the Waverley Local Plan and policy LU2 of the Surrey Hills Management Plan.</p> <p>Does not consider circumstances have improved in transport terms since 2009 with the development remaining a vehicle dependent settlement, nor does it believe that the mitigation or alternative transport measures proposed in the application to be sufficient to outweigh or alter the conclusions drawn by the Inspector and the Secretary of State that the site is inherently unsustainable. Given the landscape context in which the site is located the high density urban design of the development, incorporating 4 storey buildings and landmark towers, would introduce an incongruous form of development uncharacteristic in the Surrey countryside and inappropriate to the setting of the AONB.</p> <p>Bats</p> <p>Considers that the proposed development could have significant adverse impacts on these European and U.K protected species and does not believe that the survey work undertaken as part of the application provide an accurate assessment of the environmental effects. Specific radio tracking surveys of these species should be undertaken to identify roosts, flight-lines and feeding and foraging areas.</p>
Natural England	<p>Original scheme:</p> <p>Protected landscape AONB - Objection</p> <p>Natural England considers the Landscape and Visual Impact Assessment (LVIA) has not been adequately undertaken – potential for significant impact on the purposes of designation of the Surrey Hills AONB</p> <p>The LVIA is likely to have underestimated the significance of visual impacts on the AONB and its setting particularly during operation, given the scale of the proposed development, its close proximity and that it is out of character with the surrounding landscape.</p>

	<p>Nationally designated sites - No objection subject to conditions</p> <p>Green infrastructure – recommends conditions</p> <p>Biodiversity enhancements This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of boosting opportunities for bats, the installation of bird nest boxes or the use of native species in the landscape plans. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application.</p> <p>Additional response: Maintains objection due to landscape concerns. Following a site visit, do not agree with the LVIA submitted, and consider that the application would have a significant negative impact upon the AONB. If evidence is provided to address the concerns, the objection would be removed.</p> <p>Require a thorough look at onsite visual buffering mitigation to moderate the effects on the AONB setting.</p> <p>The following are suggested as appropriate mitigation strategies:</p> <ul style="list-style-type: none"> <li>- Greening aspects, such as green roofs and wall</li> <li>- Reconsideration of building heights</li> <li>- Provision of a legal agreement that the Country Park would not be built on for the life of the development</li> <li>- Emphasis on wild landscaping and green infrastructure, in keeping with the surroundings throughout the development.</li> </ul> <p>Does not give weight to previous decisions by LPAs or Secretaries of State, and judges each application on the basis of its individual characteristics and likely relationship to its immediate and wider landscape setting.</p> <p>Concerns regarding bats and Green Infrastructure have been satisfied.</p>
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	<p>Would expect re-consultation at reserved matters stage.</p> <p>Response dated 02/12/2016:</p> <p>In order for Natural England to remove objection to the application further certainty required to confirm that concerns will be addressed in the form of a planning condition or obligation. Suggest that suitably worded conditions were included and would like to see these being referred to within the memo as a formal record to be submitted with the application:</p> <p>The proposed 250 acre Country Park will be secured and available for the lifetime of the development.</p> <p>Green infrastructure will be a prominent aspect of the development site, including the provision of green roofs and walls on any buildings of 20m or above in height as well as the school buildings, car barns and some of the larger residential and commercial units.</p> <p>Key views from Hascombe Hill will be mitigated through use of a mix of planting and green infrastructure such as green roofs and/or walls to screen the development and blend it within the existing setting.</p> <p>Recommend previous conditions which were the letter dated 03 March 2016 (reference 175341) to ensure the protection of the Chiddingfold Forest SSSI and protected bat species in the area.</p> <p>Once it is confirmed this is acceptable and has been submitted to the LPA, Natural England will the formally respond to Waverley Borough Council stating that they will remove the objection on the basis that these conditions are included.</p> <p>Final comments to be updated orally.</p>
NHS England	No comments received
Open Spaces Society	No comments received
Police Architectural Liaison Officer	No objection but the development should take account of 'Secured by Design' guidance.

Public Health Surrey	No comments received.
Ramblers Association - London	No comments received
Ramblers Association- Hasl, Chid, Duns & Alf	Concerns regarding the crossing of the A281 on the Public Right of Way.  Where it is possible, paths should be separate. Where they are to be combined, they should be of a segregated design to avoid the possibility of accidents.
RSPB	No comments received
SCC Adult Social Care	Generally recognises the need for elderly care provision in Surrey. No objection raised.
County Archaeologist	Original response:  The applicants have acknowledged the heritage interest in the site by including a chapter on cultural heritage and archaeology as part of their wider Environmental Statement. The chapter is based on desk based research from Oxford Archaeology that deals mainly with the potential for below ground archaeological remains, and a photographic record of significant buildings produced by Paul Francis of Airfield Research Publishing. The latter document provides a comprehensive photographic and descriptive record of the airfield buildings, as well as containing a basic statement of the significance of the surviving structures. Concerned that this document is dated 2007 and therefore it will need to be updated to ascertain that there has been no significant changes in our understanding of the importance of the standing buildings and in particular their present day heritage significance.  Despite the need to update the statement of significance, can confirm that the baseline archaeological information provides a detailed view of the known heritage assets on the site and correctly identifies that there is potential for buried archaeological remains pre-dating the airfield to be present. In order to more fully understand the buried archaeological potential it is suggested that further archaeological investigation in the form of a field evaluation will be required and confirms that this is appropriate.

	<p>In the case of the standing buildings, a considered approach has been taken that combines preservation of key elements with detailed recording in advance of demolition of the less important buildings. Confirms that the approach outlined is appropriate, subject to the results of the updated statement of significance, and will ensure that the most important elements of the site will be retained and a full record made of buildings that are to be removed.</p> <p>To allow for the implementation of the mitigation measures, recommends that a condition of any Outline planning permission be that any detailed planning application(s) to follow are accompanied by the results of an appropriately scaled field evaluation and an updated statement of heritage significance.</p> <p>Amended response: No change to previous advice.</p>
<p>County Education Authority</p>	<p>Early Years provision:</p> <ul style="list-style-type: none"> <li>• either a contribution of £1,209,471 for early years infrastructure in the Dunsfold Park area;</li> <li>• or request that the developer provides a bespoke nursery building or community building on site that an early years setting could operate from.</li> </ul> <p>Primary Provision:</p> <ul style="list-style-type: none"> <li>• either requests a contribution of £6,167,304 towards primary infrastructure in the area;</li> <li>• or requests that the developer provides a new two form entry primary school on the development site.</li> </ul> <p>Secondary Provision:</p> <ul style="list-style-type: none"> <li>• Contribution of £3,345,385 to modify the existing secondary education infrastructure at Glebelands School</li> </ul>
<p>County Environmental Assessment Officer</p>	<p>Original response: The review undertaken recommends that the Environmental Statement submitted in support of WA/2015/2395, as augmented by the clarifying information provided on 15 March 2016, is of an acceptable standard for the planning authority to proceed with the determination of the application.</p>



	<p>Additional response: The impact of the changes to the flood risk assessment for the conclusions of the other technical chapters of the original Environmental Statement has been subject to an appropriate level of review.</p> <p>The updated assessment set out in Chapters 4, 5 and 6 of the further environmental information report (with regards to the impact of the amended transport assessment on air quality and odour, noise and vibration and access, traffic and transport) is provided for clarity and completeness and the original findings in the Environmental Statement were not changed. All other chapters of the original statement were unaffected by the changes to the Transport Assessment.</p> <p>Part C: The additional analyses on the further environmental report have not altered the findings or conclusions of the original Environmental Statement, but ensure the assessment reflects the most up to date information in terms of fluvial flood risk and transport and traffic effects. The Environmental Statement, as amended by the additional information, is of a sufficient standard to inform the determination of the planning application.</p>
<p>County Highway Authority</p>	<p>Response dated 2/12/2016</p> <p>Highway safety and capacity</p> <p>It is established that a safe and suitable main access into the site is achievable from the A281 by means of a roundabout junction, just south of Fastbridge, and this has been agreed in principle. Further work will be required in terms of Stage 2 and 3 safety audits, detailed design and speed reduction measures, which can be determined at the “Details Pursuant” planning application stage.</p> <p>In addition to the proposed site access road and roundabout, the following measures are offered as highway mitigation within the revised TA:</p> <ul style="list-style-type: none"> <li>• A281/Nanhurst Crossroads – junction widening and capacity improvements</li> <li>• A281/Barrihurst Lane – improvements to right turn facility</li> </ul>

- A281/Station Road - signalisation of the existing mini-roundabout (Bramley)
- A281/Kings Road – widening of existing roundabout (Shalford)
- A281/Broadford Road – conversion from priority junction to roundabout (Shalford)

Initial Safety Audit work has been undertaken by SCC in respect of the proposed junction mitigation schemes and developer responses have been provided in terms of the safety issues raised. SCC is satisfied that the proposed junction alterations are acceptable in principle and deliverable subject to detailed design and legal agreements.

A suite of Traffic Regulation Orders and restrictions for both construction and development traffic will need to be agreed should permission be granted in order to minimise the impact of the development upon unsuitable local routes but also to provide safe and permeable bus, cycle and emergency access. This could be delivered via a “monitor and manage” fund, the legalities and scale of which are yet to be established and agreed.

The extent of the area of assessment in terms of junction and accident analysis has been extended at SCC’s request and has enabled a comprehensive analysis of the A281 corridor, together with some assessment of the wider area.

A Paramics Model has been used to assess the operation and impacts on A281 in the vicinity of the site from Alfold Crossways in the south to Shalford Roundabout in the north. There has been much iterative work in terms of developing the modelling, but SCC is now satisfied that the totality of mitigation on this corridor provides an adequate improvement to the whole corridor performance, so that the additional traffic likely to be generated by the development of the site will not lead to the overall worsening of performance of this corridor. In addition, there are also 20 separate junction models on the wider network, some of which are showing that there may be a need for mitigation in future. Allowance has been made for this to the satisfaction of SCC in our requirements of the developer through the Section 106.

The impact upon Guildford Gyratory has not been modelled in detail, and this has been accepted due to the unknowns in respect of its future. It is however clear from the modelling that has been done on the A281 within the Borough of Guildford, that there will be a material impact on the network into and out of the town, primarily on the A281, and its parallel route, the A3100. As a result of this, a sum of money would be required of the developer, also through the Section 106 process, to mitigate those adverse impacts.

Parking:

In terms of the site wide parking strategy, SCC remains unclear about the management and enforcement of the proposed car barns and the nature of the envisaged parking controls within the “controlled access zone”. Although it is recognised that this is a details pursuant matter, in respect of assessing the resultant likely trip generation, the approach is relevant at this stage. SCC is aware that Waverley’s Parking Guidance does not support parking restraint at this location and the overwhelming feedback from Members at the presentation on 23/2/16 was that they would be seeking demand led parking. The development proposals however remain below the minimum standard and additional analysis work has been undertaken which shows that the proposed provision is higher than parking levels within adjacent wards (Census). SCC is of the view that the approach taken it is unlikely to affect the safe operation of the highway network and do therefore not raise further concerns. SCC would however highlight to the LPA that given the location, this is the wrong type of development for parking restraint and unless measures are applied within the development which are so draconian that they will materially affect car ownership and use, overspill parking may result within the development envelope and the design of the scheme may be compromised through injudicious parking. This conclusion also affects the trip generation and modal split assumptions made within the TA and SCC is of the view that external vehicular trips may be higher than assumed within the TA and applied to the capacity modelling. This could be of concern, not only in terms of peak hour capacity but also the wider environmental and amenity impacts throughout

the day, evening, weekend and in terms of overall mileage travelled.

Severity of Impact:

In terms of the safety implications of the proposed mitigation, the County Highway Authority is satisfied, that the Stage One Safety Audit issues can be satisfactorily addressed at the detailed design stage. The reduction in the speed limit on this stretch of A281 will also assist in safety mitigation of any potential additional accidents arising from the new access. The other junction improvements will be just that, in that they will create safer junctions on the A281 than those that currently exist, so the impact of the increased traffic through them will be offset by the safer layouts being proposed.

In terms of congestion and performance of the network, the auditing of the A281 model shows that in overall terms, the corridor will perform better in journey times than would be the case without the mitigation. The improvements at Shalford, Nanhurst and Barihurst provide significant benefits to overall travel on the corridor. The proposed improvements at Bramley deliver some benefits, especially to the northbound AM peak movements. Whilst to a degree, these are offset by slight increases in delay to the southbound PM movements, it is expected that there would be some overall benefit to the performance of this junction. There is also the opportunity in the recommended package, to seek financial contributions in lieu of the Bramley works in kind, in the event that a preferred solution is found before the need to implement the junction works arises.

Appropriateness of Mitigation Package:

The suggested measures contained at the end of this response are a reflection of the overall impact on the wider network, and the quantifiable impacts shown by the modelling. The combination of improvements in kind, financial payments towards a suite of potential junctions/network improvements, and as firm a commitment as we can secure in terms of providing a bus network for perpetuity, produces a package that in our view provides an acceptable approach to mitigation given the locational disadvantages of the site. SCC also acknowledges that

whilst some of the measures proposed will have a wider benefit to existing congestion, and go beyond mitigating the development impact, this is to off-set other locations where the provision of appropriate mitigation cannot be demonstrated/is in doubt.

Sustainability of location:

There has been no counter-evidence to that presented at the 2009 appeal on these issues, where it was demonstrated to the Secretary of State that housing at Dunsfold would have considerably fewer destinations accessible for non car modes, than would be the case with a sustainably designed urban extension. Requests for more research into this concern over the intervening years has not been produced by the developers in an attempt at demonstrating that travel is as sustainable as that generated by extensions to urban areas. Furthermore the study undertaken by Waverley on the local plan scenarios shows the provision of a significant quantum of housing at Dunsfold to be the least sustainable option in transport terms.

The unknowns are the populations who will be occupying the housing at Dunsfold. It is, highly likely that many of the houses will be occupied by overspill from the outer London Metropolitan area seeking less expensive housing, whilst trying to continue their working lives in current locations elsewhere in the South East. Even if the mitigation being proposed delivers that which it intends for perpetuity, it does not follow that the travel opportunities provided will be actively taken up. Even if they are, they will barely dent the overall volume of per capita car mileage which inevitably will result from locating 1800 new households in the remotest corner of the County of Surrey. Given that the development will plainly be overwhelmingly car-reliant, it is disingenuous to accept that there are real opportunities for minimising reliance upon the private car.

The suite of initiatives proposed by the developer, with the exception of the undertaking at this stage of a bus service in perpetuity is nothing new, radical, or forward thinking. This is of no fault of the developer, as there is little that can reasonably be introduced in this location, which is cost

effective, as well as environmentally sustainable. No evidence has been produced that the proposed bus services will deliver these two fundamental credentials, and the present undertaking to fund them for perpetuity, is likely to be the subject of a serious challenge if over time, as suspected, little use is made of them.

There have therefore been insufficient changes to the previous proposals in 2009, or evidence demonstrating that in fact the development is sustainable in transport terms, to remove this element of objection, and the County Council will therefore express an objection on these grounds.

It is, however, recognised that the Developer has “explored” new territories in terms of striving to provide a method of delivering a bus network for the life of the development. It is for this reason that examples of this successfully operating elsewhere cannot be found, so this element of the mitigation, will by definition be a “leap of faith”. If Members are minded to grant permission that should not be a reason not to try it, particularly if the final head of term in the County’s recommended Section 106 Heads of Terms is included. This requires a detailed post opening travel assessment, prior to any further housing beyond the 1800 units, subject of this application, being granted further permission.

#### Conclusions

Overall there remain issues with the development’s transport assessment. However, the agreed transport package provides sufficient mitigation to deliver overall benefits to the A281 corridor, which when combined with the other elements contained within the proposed Section 106, should go some way towards reducing the total travel impact. A significant element of the package is the undertaking of the developer to fund the provision of bus services in perpetuity (with the caveat that they can be reviewed by the Transport Review Group). Members are asked to recognise this, and include consideration of this in their overall decision on whether or not to grant planning permission. It is for this reason, combined with the undertaking to fund other required mitigation measures in the vicinity, and to provide in kind specific highway

	<p>improvements, that the highway authority are not objecting on capacity or road safety grounds. It is crucial that the need for a “watertight” method of securing the perpetual provision of bus services at the level proposed (or similar) is integral to any decision that Members might make on this application.</p> <p>As explained above, there does still remain the objection on the locational challenge of the site, and the fact that the creation of a new settlement in this relatively remote part of the Borough will lead to greater distances being travelled, and less sustainable travel choices than would be the case if the quantum of housing were located either within, or adjacent to the existing urban areas which are creating the demand for the additional 1800 homes. Members are asked to consider this objection in the overall balance of appraising this application.</p>
<p>County Rights of Way Officer</p>	<p>No objection, but the following comments made:</p> <ul style="list-style-type: none"> <li>• The applicant should provide the surfacing and lighting improvements under a s.278 agreement for the Downs Link between Dunsfold Park (DP) and Cranleigh, the Public Bridleway 282 between DP and Dunsfold Village, Public Bridleway 400 Alfold and Public Bridleway 280 Dunsfold, including a legal agreement securing a financial lump sum payable to the County Council if the applicant fails to secure the improvements. This would include a sum for compensation payable to landowners (if required) in order to be able to progress the proposal.</li> <li>• Any bridge over Public Bridleway 400 Alfold, would be subject to a new bridge design being subject to condition and suitable for equestrian users.</li> <li>• County Council would be able to deal with the necessary legal documentation in terms of status upgrades, i.e. public footpath to bridleway, but the applicant would be expected to cover all reasonable costs.</li> <li>• The proposed Public Rights of Way would overburden the County Council, and therefore it is suggested most of these routes be permitted paths. In particular, the County Council would want to see four routes as dedicated Public Bridleways. A s.106</li> </ul>

		<p>agreement should cover this requirement.</p> <ul style="list-style-type: none"> <li>• Improvements would be sought to some of the existing PRow network.</li> <li>• Edge of carriageway improvements would be required to provide at least footway infrastructure to sections of Godalming Road, Alford Road, Three Compasses Lane and Knowle Lane. This would be secured under a s.278 agreement.</li> <li>• Financial contributions sought for some of the works listed above (details in the Infrastructure Contributions section of the report).</li> </ul>
County Social Services Dept.		No comments received
County Travel Smart		<p>Requests additional improvements to:</p> <ul style="list-style-type: none"> <li>• The cycle route to Witley Station</li> <li>• A281/A248 junction - a safe cycle route for cyclists from the Downs Link to where it joins Horsham Road at Shalford Park.</li> <li>• Surfacing improvements to the Elmbridge Road connections to the Downs Link for cyclists.</li> <li>• Cycling on-site include cycle paths on both sides of the road, cycle routes link to desired destinations, public bike pumps, secure, well-lit cycle parking.</li> <li>• Cycle routes, maps and secure parking need to be in place before occupation of development.</li> </ul>
County Waste & Minerals		No comments received
Scotia Gas Networks		No comments received
Scottish & Southern Energy Plc		No comments received
Southern Gas Network		Low/medium/intermediate pressure gas main near the site. General advice about maintaining access provided.
Southern Water		Development is not located within SW's statutory area for water supply, drainage and wastewater services.
Sport England		<p>Original response: Objection</p> <p>Sport England objects to the proposal because of an absence of sufficient detail and reserves judgement until</p>



	<p>that work is forthcoming.</p> <p>Additional response: No objection, subject to recommended conditions.</p>
Surrey Police	<p>The development of up to 1800 dwellings as part of a new settlement at Dunsfold Park would represent a significant increase in the population of Cranleigh, within the Waverley Borough. Policing is a population based service and this proposed uplift in population would inevitably place demands on existing policing services. The proposed development has therefore been assessed having regard to its implications upon the infrastructure requirements of Surrey Police and the impact the scheme will have upon the day to day policing of the area. In order to effectively provide the current level of policing to the increased population, developer contributions towards the provision of infrastructure will be required.</p> <p>(Details of requested contributions included within Infrastructure section of report)</p>
Surrey Fire & Rescue Service	No comments received
Surrey Wildlife Trust	<p>No overriding objection – conditions recommended as no concern if recommendations in Ecology reports implemented.</p> <p>Applicant should be required to undertake all the recommended actions in the Discussion and Mitigation sections of these Reports, including the detailed biodiversity enhancements.</p> <p>Recommends that updates required to appropriateness of species report findings and mitigation proposals.</p> <p>Additional response: The proposed mitigation to protect the two identified rare species of bats is unlikely to be sufficiently detailed to ensure the best chance of conserving and preferably enhancing the bats status on the site. Further specialist survey work would help develop a mitigation strategy that would be most likely to deliver a positive biodiversity result.</p> <p>Support Natural England’s proposed condition for</p>

	<p>Ecological Management Plan, which should incorporate all the mitigation proposals already detailed that should be 'fine tuned' by comments and advice provided by ecological consultants.</p> <p>Advise against the loss of ancient woodland habitat due to its irreplaceable nature. Currently unclear how much Ancient Woodland would be lost as the road design has not been finalised. There should be a 15m buffer allowed between development works and Ancient Woodland trees.</p> <p>Overall, it would be important that the significant mitigation proposals would be implemented in full were the application to be granted.</p>
<p>Thames Water Utilities</p>	<p>Waste Comments: Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water requests a 'Grampian Style' condition.</p> <p>Waste: The application is proposing to deal with the development foul water flows by using onsite sewage treatment. While this proposal does not directly affect Thames Water at the moment, should it prove not feasible then the alternative is likely to be a connection to the public sewer for which TW would have serious concerns.</p> <p>To address this uncertainty the planning authority should require the developer to produce a detailed drainage strategy.</p> <p>Water: Appropriate phasing required – to ensure suitable water supply infrastructure is in place</p>
<p>UK Power Networks</p>	<p>The applicant should contact the UK Power Networks if any works are required to relocate the electricity network, including telecoms masts, substations, overhead line networks and underground cables.</p>

Council's Waste & Recycling Co-Ordinator	Given the application is not specific as to the type and location of dwellings, no comments on the precise number of bins required or any issues with access. An accurate PIC is not possible.
Councils Leisure Service	Final comments to be updated orally.
West Sussex County Council	<p>Original response:</p> <p>Having reviewed the consultation responses available on the Waverley planning portal, it would appear that the trip generation and distribution of trips has yet to be agreed between the Developer and Surrey County Council (SCC). Therefore, is not possible to determine the impact on West Sussex network or whether any mitigation works are necessary, until such a time that SCC is satisfied that the transport assessment is an accurate reflection of anticipated traffic impact.</p> <p>Amended scheme:</p> <p>Considers that there is insufficient evidence to determine whether the significant impacts of the development on the West Sussex County Council roads can be adequately and cost effectively managed or mitigated in accordance with the NPPF.</p> <p>Particular concern is raised over the A281/A29 junction, where the proposal would push the junction over theoretical capacity.</p> <p>An obligation should be sought requiring the developer to undertake works at this location.</p> <p>Further assessment required for the impact of the proposal on the B2133 and A286. The A272/A286 junction is sensitive to minor increases in traffic flows, as modelling demonstrates for local plans of West Sussex. Further assessment of this junction is required.</p> <p>Mitigation schemes may be required for the B2133 as a result of increased traffic flow in order to avoid severance of the existing settlements that extend on either side. This could be in the form of formalised crossing provision or traffic calming. If minded to permit this scheme, an</p>

	obligation should be sought to implement a scheme of traffic calming and crossing works along the B2133.
Wey & Arun Canal Trust	<p>In developing our plans for restoration of the canal in Waverley, the Trust has worked closely with the owners of Dunsfold Park, as approximately 1.5km of the Canal comprises the eastern boundary of the aerodrome.</p> <p>The inclusion of the new canal basin is consistent with the Trust's long-term strategy for the usage of the canal for navigation and leisure boating, with private mooring facilities located off the main canal line.</p> <p>The Trust strongly supports the northern option for the position of the link road roundabout. If the southern roundabout option is selected, the Trust's work to create a new crossing of the A281 at Fastbridge will be just as difficult as it currently is.</p>
Canal and River Trust	No comments received.
Woodland Trust	<p>Objection</p> <ul style="list-style-type: none"> <li>• Loss and damage to Ancient Woodland</li> <li>• Fragmentation and degradation of the surrounding wooded environment as a result of separation of ancient habitats.</li> <li>• Intensification of recreational activity of humans and pets cause disturbance to habits of breeding birds, vegetation damage, litter and fire damage.</li> <li>• Pollution from construction</li> <li>• Introduction of non-native species</li> <li>• Indiscriminate lopping and felling of trees near to or overhanging the development.</li> <li>• Dumping of garden waste in woodland directly adjacent to rear gardens.</li> <li>• Changes to hydrology.</li> <li>• Light and noise pollution affecting species of animals</li> <li>• Request a 50m buffer between Ancient Woodland and the development.</li> </ul>
Parish Councils	Joint response (11 parish councils):

Original response:

(Accompanied by Vision Transport Report)

- The site is not considered to be sustainable
- Forecasts of the number of vehicle trips are not robust and are underestimated
- Storage and Distribution Employment trip rates (B8 use) are greatly understated
- Traffic impacts have not been compared appropriately
- A281 corridor forecasts do not show the traffic impact or junction performance appropriately
- The impact and traffic using rural roads and wider junction network is understated
- Road safety issues have not been properly assessed
- Mitigation measures are limited
- Junction modelling should be revisited

Additional joint response:

(Accompanied by detailed transport report)

The impacts identified within the RVTA are based on inappropriate trip rates and analysis and do not adequately identify likely transport impacts associated with the development proposals. Should development trip rates be uplifted (in accordance with the recommendations contained within Section 5 of this report) then the impacts are likely to be much greater and again may be considered 'severe'.

It is considered that the development is not located so as to reduce the need to travel, especially by private car, and fails to adequately encourage a higher proportion of travel by walking, cycling and public transport. As such it fails to satisfy the two tests set out at (a) and (b) within policy M1 of the Local Plan.

It is concluded that the proposals fail to meet national, regional and local policies in respect to sustainable development and transport. In the most basic sense it is concluded that the development proposals are in the wrong location and cannot be made accessible by the sustainable mitigation measures that are proposed. The development

proposals will be 'car dependent' and based on the evidence set out within the RVTA will be likely to result in a 'severe' impact on the wider highway network both in terms of capacity, congestion and road safety.

Alfold Parish Council - objects:

- Site is primarily agricultural land.
- Development would be incongruous within the rural setting of the site. Urbanizing impact on the open countryside is a material consideration.
- Does not seek to address the lack of services such as social services, health and education.
- Does not address who would be responsible for the cost of any increase in services.
- Has not demonstrated the ability for utilisation of local employment which would be generated by such housing.

Additional response:

- Application remains vague on important issues such as traffic mitigation and lack of infrastructure.
- Policy C2 which limits development in the countryside is very relevant.
- Application could be considered premature as it would effectively pre-empt the proper consideration of alternatives as part of the development planning process.
- Sustainability is not achieved, as the NPPF requires.
- Considerable traffic generation.
- Housing figures are outdated
- Consultation process was skewed for Local Plan
- Local Plan and this application would concentrate too much housing for the benefit of the borough in one area.
- Local Plan fails to take account of sustainability issues.
- Vision Transport Review shows proposed traffic mitigation schemes would be inadequate and is based on flawed data.
- Does not set out in detail the mix of affordable housing.
- Too many affordable homes in one area of the borough.

- Proposed density is of a town, not a rural area.

Artington Parish Council:

- Concern at the impact the proposed development likely to have on the already overloaded local road network, in particular the B3000.
- This narrow road, which provides an inadequate link between Godalming and the A3, currently handles some 5 million vehicles a year; a figure which is likely to be greatly exceeded if the proposed Blackwell Farm with its 1800 homes is approved. The proposed development at Dunsfold would also add a further significant number to the total.
- The narrow humpbacked rail bridge on the B3000 is particularly hazardous with its limited visibility and further traffic will only exacerbate this problem and result in unacceptable congestion.

Bramley Parish Council - objection:

- Not opposed to development as long as improvements are made to road network first.
- Currently an unsustainable development against the five guiding principles of sustainable development.
- Proposed development would have severe impact on pollution, public health, the environment, highways and transportation, which has not been adequately mitigated.
- The Transport Assessment submitted is not robust and has underestimated vehicular trips with consequences on the appropriateness of mitigation measures.
- The mitigation measures for Bramley junction would result in the narrowing of pedestrian footways to below 2m. The scheme appears to consider capacity over pedestrian movement, contrary to sustainable transport aims.
- Pollution by increased traffic running through Bramley
- No mention of impact on residents living alongside the A281, including occasional damage by traffic vibration.
- Proposed B8 use is excessive and should be capped to present level. Disparity between figures in the

assessment.

- No mention of emergency services response times.
- The proposed sustainable transport measures are not set in stone. Refers to 'investigation' into measures which may not come into fruition.
- Car sharing scheme would require a Site Wide Travel Co-ordinator which is not mentioned in the TA.
- Children in nearby villages will likely want to use the site's school facility. Further, not all children on the site would go to the new school. The TA does not take account of the 7 schools on, or near, the A281
- Does not take into account home delivery services and respective increase in van travel.
- Bramley cannot cope with an additional 180 HGVs daily.
- TA does not take account of road widths towards Guildford, especially at the Seahorse in Shalford, in Bramley Conservation Area and near Loxhill
- Railway stations suffer from lack of parking.
- No information provided with regard to safety issue at the A281/Station Road junction.
- Bramley PC has received preliminary report from civil engineer on the signalisation of the junction, which indicates it would not solve the issue and would increase traffic flows down narrow winding roads such as Foxburrow Hill Road.
- Accident history does not include the A281 / Station Road junction.

Busbridge Parish Council - objects:

- Sustainability
- Air and noise pollution
- Increased danger from road traffic accidents.
- Supports the POW campaign.
- Highways England has stated that the A3 is already at full capacity, especially around Guildford.
- Parking at Godalming station has a waiting list for parking season tickets, with pressure on Milford and town centre car parks as a result. Milford car park is full from 9am with parking outside the designated parking spaces.
- Station Road, Salt Lane and Markwick Lane are



unsuitable for HGVs and are narrow with blind corners.

Additional response:

- There are many small roads and lanes which are inadequate for large numbers of users travelling to and from many different places over a wide area.
- The densely populated urban centres are all, with the exception of Cranleigh, served by the mainline rail network and its branch lines.
- The sustainable transport section within the revised transport assessment for the proposed new town at Dunsfold Park does not even mention rail travel.
- Without any other sustainable options and without access roads of the size needed to cope with a new town this simply cannot work in transport terms.
- The only sustainable option for Waverley's housing needs is to continue doing what we have always done; spreading the load evenly across the Borough, concentrating near the mainline railway and the A3 and certainly not by putting the majority of the load into one new town in the middle of nowhere.

Chiddingfold Parish Council - objects:

- Poorly located.
- Very little has changed since the 2009 appeal, apart from the introduction of the NPPF which reinforces sustainable development
- Generation of a significant extra movement of cars and goods vehicles along lanes in Chiddingfold Parish. These lanes are widely used for recreational purposes by cyclists and horse riders and fall within the AONB. Unacceptable increase in risk of accident.
- Increase in traffic would have detrimental impact on the rural character of Chiddingfold.
- Would not meet the housing needs of Chiddingfold. Greater demand for smaller properties.
- Premature until the publication, public consultation and approval of Waverley's Local Plan and before any public consultation has taken place over the transport assessment produced by Mott MacDonald.

Additional response:

“It is concluded that the proposals fail to meet national, regional and local policies in respect to sustainable development and transport. In the most basic sense it is concluded that the development proposals are in the wrong location and cannot be made accessible by the sustainable mitigation measures that are proposed. The development proposals will be ‘car dependent’ and based on the evidence set out within the Replacement Vectos Transport Assessment dated August 2016 will be likely to result in a ‘severe’ impact on the wider highway network both in terms of capacity, congestion and road safety. In addition, notes the significant impact that this development is likely to have on the minor rural roads surrounding Dunsfold Park and in particular the C34 running through to Chiddingfold and the A3 by both HGV construction and operational vehicles as well as by private cars and vans.”

Dunsfold Parish Council - objection:

- Application remains premature in absence of up to date Local Plan
- Unsustainable development - the benefits do not outweigh such unsustainability. Inspector’s comments in 2009 on this matter.
- Development would not be an eco-town but rather a dormitory for residents to work elsewhere.
- The applicant’s information suggests the development of Dunsfold Park would be to satisfy the self-generated demand from the new employment opportunities, not to satisfy the housing need of the Borough.
- Markwick Lane and Brighton Road are unsuitable for HGVs and barely fit for purpose for existing communities.
- The assumptions relating to internalisation of trips for education do not take account of students above primary school age or in the private sector.
- Unrealistic that commuters would use bus travel.
- Network Rail and South West Trains have acknowledged their services are at capacity. More parking and additional trains at Guildford are unlikely until the station is redeveloped.
- Lack of parking at nearest train stations.

- TA does not take account of inadequacy of east-west local roads for taking additional traffic.
- Developer must fully fund all additional bus services.
- Bus services must connect to railway stations and include bus routes to existing communities such as Dunsfold, Hascombe, and Alfold.
- Consideration of s106 agreement restricting vehicle ownership to electric and hybrid vehicles.
- Little information regarding traffic impact of employment related development on the site. Application should be refused until legally binding agreements including enforceable restraints on movements of commercial vehicles is completed.
- Underestimated trip forecasts and therefore mitigation measures required.
- Grampian style condition regarding waste water infrastructure would not be appropriate.
- Draw attention to DCLG's consultation on 'improving use of planning conditions' where pre-commencement conditions should be limited to issues such as archaeological investigations and wildlife surveys.
- Does not support new housing that draws in commuters; supports housing that provides housing for long-established families and other with connections to the communities.
- More work required on proposed employment mix.
- Developer is providing insufficient community benefit for existing communities. There is a zero-sum gain.

Hascombe Parish Council - Objects:

- Unsustainable location.
- Traffic forecasts and impact underestimated
- Markwick Lane and B2130 are unsuitable roads for HGVs or traffic increases.
- Safety and environmental risks on B2130 and Markwick Lane are severe.
- Traffic queues and mitigation of congestion need proper assessment.
- Special views from Hascombe Hill would be marred.
- Consultation was flawed.
- Agree with the comments made already by Natural

England, Surrey Hills AONB, CPRE and other Parish Councils

Additional response - objection

- Unsustainable and car reliant
- Request delay in consideration of application until after the examination of the emerging Local Plan.
- The use of roads within the Parish has been much underestimated by the Transport Assessment (TA).
- Thorncombe Street is very narrow and likely to become a rat-run.
- The need for homes at Dunsfold Park is in doubt following report by NMSS which identifies on 400 homes per annum required.
- Trip rates of vehicles have been substantially underestimated. SCC should take account of trip rates experienced from similar large and isolated developments.
- TA does not address HGV traffic. Legally binding ban should be imposed on using minor roads.
- Bus service should be guaranteed by the applicant.
- Cycle use is likely only to be for leisure.
- No S106 agreement has been produced to ensure infrastructure improvements are made prior to the housing being built.
- Harm to views.
- 86% PDL is incorrect.

Loxwood Parish Council- objection

- The transport statement is flawed and the mitigation measures proposed by the applicant do not make the development sustainable.
- Unsustainability supported by Inspector's comments in 2009.
- Previous scheme included more extensive transport mitigation measures, further illustrating the current application is not sustainable.

Rudgwick Parish Council – objection

- Unsustainable.
- Infrastructure impact for Surrey and West Sussex, in particular the road network.
- Improvements would be required to the junction of

the A281 and Church Street, and the junctions of Lynwick Street, Loxwood Road and Haven Road should also be investigated.

Shalford Parish Council - objection:

- Application is premature until publication and consultation of the Waverley draft Local Plan
- Level and nature of increased traffic, which would be greater than that predicted by the Transport Assessment.
- Application should not be considered in isolation.
- Existing congestion through Shalford, a main route into Guildford. Proposal would increase delays.
- Safety of pedestrians on roads through Shalford.
- No proposed mitigation scheme for the Bramley roundabout or A3100 junctions.
- Substantial increase in traffic through Chilworth
- Any works at Shalford Common require approval from Secretary of State under Commons Act 2006.
- Impact on minor roads and lanes becoming rat runs.
- Road network cannot accommodate this additional traffic.

Shackleford Parish Council – objects:

- Proposal at Dunsfold Park is unsustainable.
- It is an isolated location and residents and visitors would be largely dependent on motor vehicles for transport.
- Since appeal decision, pressure on the road network, and in particular the A3 and A281, have increased.
- The Proposal is therefore unacceptable, as it will worsen congestion and negatively affect the lives of residents in all surrounding parishes and beyond.
- Negative impact on the views and land of the Surrey Hills Area of Outstanding Beauty, which adjoins Dunsfold Park
- Confusion and inaccuracy over the proportion of Dunsfold Park that is described as brownfield
- The design, density and mix of the buildings in the Proposal, which are out of character with the area
- Inadequate water supply, sewage and drainage capability

- Previous findings of Planning Inspectors and the Secretary of State that Dunsfold Park site is an unsustainable location.
- The new Local Plan is nearly finished and a decision on the Application would be premature before it is published.

St Martha Parish Council (Albury) - objection:

- Impact on already heavily congested roads and lanes.
- Alternative routes across Surrey Hills are narrow, single track lanes which are more dangerous than major trunk roads. Increased traffic likely to result in potentially serious accidents.
- The site is not served by public transport and traffic generated by commercial users, including HGV movements, as well as commuter traffic, will have a severe impact.
- Problems will be caused at the development stage of the site.

Witley Parish Council – objects:

- Support the notion of development at Dunsfold Park as provides the critical mass necessary to make it easier to provide and fund necessary infrastructure.
- Concerns over traffic passing through Milford and Witley as an indirect route to Guildford, as a route to the A3, and for traffic bound towards the railway stations or Witley services.
- Roads are minor between Dunsfold and Witley/Milford and in some cases single track.
- Loadings on SW Trains already exceeds capacity from the stations at Witley and Milford.
- No indication of provision of secondary school.
- Support for the scheme is tempered by concern that appropriate provision is made to infrastructure in order to address the transport and education concerns.

Wonersh Parish Council – objects:

- Similar scheme was considered unsustainable by the Inspector and Secretary of State in 2009
- No developments have been made to make the site

	<p>more sustainable</p> <ul style="list-style-type: none"> <li>• The site has become less sustainable as more housing has been and is planned for Cranleigh which will use the same road network.</li> <li>• Consideration needs to be given to developments around Horsham and Guildford which will all adversely impact the existing overcrowded road network.</li> <li>• Conclusions of Mott MacDonald report have been seriously questioned by Vision Transport and SCC Highways.</li> <li>• The residual cumulative impacts of the development on transport will be severe.</li> <li>• Do not agree that this is a detailed issue that can be dealt with at planning application stage, as stated within the Sustainability assessment.</li> <li>• Does not appear to have sufficient consideration of other infrastructure issues.</li> <li>• Do not agree that minor improvements to road junctions on the A281 would make the site sustainable.</li> <li>• Agree Dunsfold is broadly brownfield, however, could only support the scheme if serious proposals were put in place to make it less car dependent such as utilising the Downs Link for train/tram or building a new link to the A3.</li> <li>• Main concerns on the Transport Assessment are that: there is a lot of focus on making journeys within the site non car dependent; the measures to reduce car dependency are unlikely to have more than a marginal impact; it seems a heroic assumption that 20% of those employed would work on site; no major initiatives which would change the assessment made by the Inspector in 2009; mitigation measures seem very unlikely to achieve benefits claimed.</li> </ul>
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### Representations

In accordance with the statutory requirements and the “Reaching Out to the Community – Local Development Framework – Statement of Community Involvement – August 2014” the application was advertised in the newspaper on 15/01/2016 site notices were displayed around the site 12/01/2016 and neighbour notification letters were sent on 23/12/2015.

1937 letters have been received raising objection on the following grounds:

<p>Impact on Countryside, landscape and rural character including impact on AONB</p>	<ul style="list-style-type: none"> <li>• Contrary to Policies C2, C3 and D1 of the Local Plan 2002.</li> <li>• Result in an alien, urban feature that would be lit at night and out of keeping with surrounding area.</li> <li>• No long term protection of the parkland, including existing woods, is offered by the applicant.</li> <li>• Light pollution from the development would impact currently unspoilt rural area.</li> <li>• Should be preserving the natural and tranquil rural heritage, not ripping it up and destroying it.</li> <li>• Sheer size of the development is disproportionate to all the surrounding villages, it will eventually destroy the rural ambience.</li> <li>• Proposal will urbanise the Surrey Hills within a 12 mile radius.</li> <li>• Poor integration between the development and the AONB with regards to public rights of way and access</li> <li>• Loss of character and recreation opportunities</li> <li>• Detriment to the aesthetics of the landscape character of the area</li> <li>• Blight to views available from vantage points in Hascombe</li> <li>• Adverse impacts on the designated 'Surrey Hills Conservation Area'</li> <li>• Negative impact on views from Winterfold</li> <li>• Proposed building heights are not appropriate with the rural landscape</li> <li>• Proposal uses a site that is remote, rural, not brownfield in the traditional sense and is adjacent to and overlooked by an AONB</li> <li>• This development will cause a deterioration of what is currently the most accessible part of beautiful countryside.</li> <li>• Precedence has been set for the refusal of large proposals that impact on the AONB and the countryside beyond that lack the required infrastructure by refusal of the Springbok proposal. The reasons for refusal should be applied directly to the Dunsfold proposal.</li> <li>• Proximity to rural settlements of Alfold, Alfold Crossways, Dunsfold, Chiddingfold and Hascombe would conflict with Policy RD1.</li> <li>• Proximity to AONB and impact on it</li> <li>• Natural England intends to extend AONB to include Dunsfold,</li> </ul>
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	<p>which would put the new town immediately adjacent to AONB, which has special protection under the NPPF.</p>
Employment	<ul style="list-style-type: none"> <li>• Lack of employment opportunities for new residents</li> <li>• Likely disconnect between potential residents and the skills and experience required to fill the estimated provision of 2000 jobs in the industrial sector</li> <li>• Provision of warehousing within the site is unsustainable, particularly in regards to transporting goods</li> <li>• Loss of small local businesses who are based in the area</li> </ul>
Ecology	<ul style="list-style-type: none"> <li>• Record of nightingales in Dunsfold area is out of date (1996).</li> <li>• Urbanisation of this scale will have a negative impact on the SSSI areas and ancient woodland nearby and the endangered species that reside nearby.</li> <li>• Loss of flora, fauna and green space</li> <li>• The site is alive with Red Kites, Buzzards and Skylarks, these will be displaced or lost.</li> <li>• Little regard appears to have been given to the loss of wildlife habitat (Linnets and other rare/endangered species are in residence)</li> <li>• The surveys undertaken to date do not take account of Bechstein and Barbastelle bats colonies.</li> <li>• New access should be located to the north of the Wey and Arun Canal to avoid impact on flightlines – Compass Bridge access should be closed.</li> <li>• Loss of ancient woodland within close proximity to the site</li> </ul>
Drainage/ flooding	<ul style="list-style-type: none"> <li>• Although not in a flood zone, extensive building at the site would cause higher levels of water in nearby streams and waterways as a result of run-off potentially increasing flooding in other areas.</li> <li>• Result in increased flood risk in the wider area</li> <li>• Flood risk on the site</li> <li>• Site located on a clay soil area that becomes highly waterlogged, concern that the problem will worsen with increased run off from development</li> <li>• Currently the site drains into the canal and other peripheral watercourse. With the addition of more impermeable buildings on site the run off of rain will inevitably increase, whilst the site itself is unlikely to flood the loss of capacity to hold water and thus buffer the rainstorms will contribute to storm surges downstream.</li> </ul>
Infrastructure	<ul style="list-style-type: none"> <li>• Any proposal to build 3400+ new homes on Dunsfold aerodrome must be developed in tandem with SCC to</li> </ul>

	<p>approve a robust strategy that will sufficiently upgrade and improve existing transport services.</p> <ul style="list-style-type: none"> <li>• No adequate provision for water supply and water sewage.</li> <li>• No provision for secondary school children, schools in the area are already oversubscribed.</li> <li>• Existing medical services would not be able to accommodate new residents before the planned medical centre in Phase 2 was built.</li> <li>• Provision required for new schools and healthcare facilities</li> <li>• Local hospitals are already stretched, a development of this size would seriously impact health outcomes.</li> <li>• Primary school is inadequate for the number of pupils it could potentially have based on the size of the development.</li> <li>• An article in the Surrey Advertiser dated 22/01/2016 stated that there is a £3 billion funding shortfall for the scheme to develop Surrey's infrastructure, on this basis alone the proposal should be refuted.</li> <li>• Lack of funding programmes to finance the large scale infrastructure that is required to make this proposal sustainable</li> <li>• Increased pressure on facilities and services in Cranleigh, Guildford, Haslemere and Chichester</li> <li>• Existing pressure at hospitals in Guildford and Chichester</li> <li>• Housing developments should be located in areas with existing infrastructure</li> <li>• It fails to address the requirement to put in place appropriate road and other infrastructure required to support a development of this scale</li> <li>• It will place an excessive burden on local services such as hospitals, schools and public transport</li> <li>• There is no long term view – there are no proposals for very significant and long term investment (developer and government) to improve ongoing infrastructure deficiencies.</li> <li>• Capacity pressure on existing water, electricity and sewerage systems</li> <li>• Poor existing telecommunications network</li> <li>• The village has very poor broadband and mobile phone connectivity. There are no gas mains and the village has been subject to a number of powercuts in the last 12 months.</li> <li>• The proposed infrastructure contributions must be made public prior to the determination of the application.</li> </ul>
Proximity to	<ul style="list-style-type: none"> <li>• Does not comply with policy M1 of the Local Plan (2002) as</li> </ul>

amenities	<p>the lack of amenities within the site would create a greater number of car journeys through Waverley.</p> <ul style="list-style-type: none"> <li>• Local centre provision is inadequate to cater for all of the residents' needs, forcing them to use facilities in neighbouring villages and towns</li> </ul>
Highways issues	<ul style="list-style-type: none"> <li>• Contravenes paragraph 32 of the NPPF as the development would have a severe negative cumulative impact on local roads as a result of the lack of existing infrastructure.</li> <li>• Transport Statement is flawed and the mitigation methods proposed by the applicant do not make the development sustainable. It therefore fails to meet paragraph 17 of the NPPF. In addition the previous application contained more extensive transport mitigation measures further illustrating that the current application is not sustainable.</li> <li>• Traffic census carried out along B2130 on 24/11/15 was on a day the road at Hascombe, due to leaking water main, was closed therefore any data used from this is grossly out of sync with real number of users.</li> <li>• Proposed access would be poor and unsafe from the application site</li> <li>• The base analysis of the A281 traffic is modelled on 2014, before the massive developments to the west and south of Horsham were inhabited.</li> <li>• Increase in vehicle movements on a road (A281) already at capacity</li> <li>• The scheme acknowledges that 33% of retail shopping traffic will use the B2130 through Hascombe, this road is not equipped to take this extra load.</li> <li>• Bottleneck at Crownpits Lane.</li> <li>• Markwick Lane is a single track road and there are regularly head on collisions especially as HGVs are now using it as a cut through from the A3 to Cranleigh and Dunsfold.</li> <li>• Insufficient provision for road upgrades</li> <li>• Suitability of the highway for more traffic not demonstrated and inadequate provision made for pathways. Danger to pedestrians and children.</li> <li>• Have the emergency services been consulted re the massive increase in traffic?</li> <li>• Existing and future congestion including at Bradford Road and Bramley, Horsham and Crawley, Shalford and Cranleigh junctions; between Bramley and Guildford, Horsham and Guildford; on the A3, the Dunsfold Road and within Godalming and the wider Surrey area</li> </ul>

	<ul style="list-style-type: none"> <li>• No realistic or practical solution provided.</li> <li>• There is no new evidence in the form of traffic assessments that mitigate concerns originally raised against the development which was rejected by the Secretary of State in 2009.</li> <li>• Local Roads are not suitable for the proposed increase in the volume of HGVs that would be required during the construction period</li> <li>• No traffic calming / mitigation proposed for the A281 in Bramley where the increased traffic would increase the risk to pedestrians.</li> <li>• The current situation is intolerable with both excessive traffic using the (Dunsfold) road and usage by heavy lorries (e.g. Cranleigh Freight Services at all times of day and throughout the night). Additional traffic from the proposed development would make the situation far worse.</li> <li>• Existing and future congestion would lead to pedestrian safety issues</li> <li>• Increased traffic will render road junctions unsafe</li> <li>• Many of the local roads are totally unsuitable for the amount of traffic they already carry, many of which are in a poor state of repair.</li> <li>• Concern for emergency vehicles navigating already congested roads</li> <li>• The situation is worse now than at the time of the previously refused application due to the new development at Broadbridge Heath and on the A264 between Horsham and Crawley.</li> <li>• There will be a huge increase in traffic down Fisher Lane. As part of our business, that supports the local economy, it will make it incredibly unsafe to exercise the racehorses down the road.</li> <li>• The lanes around the site are already dangerous with no pavements making it particularly dangerous for children.</li> <li>• It will put the health and safety of residents in the Borough at risk, with increased pollution, vibration and accidents – especially for those residing in the well-known ‘bottleneck’ villages directly on the A281 and the surrounding rat – runs.</li> <li>• No railway station in Cranleigh therefore commuters will use B roads to access Guildford, Godalming and Milford stations.</li> <li>• Poor road quality at Chiddingfold.</li> <li>• Challenge that the Transport Assessment is incomplete for the following reasons: only modelled during peak hours; no</li> </ul>
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	<p>modelling of HGV traffic or growth in HGV traffic; the incapacity of the existing network to accept any growth in traffic; sustainability in traffic terms has many components - e.g. network resilience during accidents, flooding, emergency repairs, roadworks and extreme weather events.</p> <ul style="list-style-type: none"> <li>• This part of Surrey has zero resilience at present.</li> <li>• The mitigations at five junctions would not address the problems, such as overall geometry, safety and capacity of the A281 itself.</li> <li>• Adverse impact of construction traffic over a protracted period.</li> </ul>
Public Transport	<ul style="list-style-type: none"> <li>• Proposed bus services are inadequate</li> <li>• Adding a single bus service to Godalming at a frequency of once every half hour at peak times at once very hour at non-peak times will not entice people to not use their cars. In addition many of the roads are too narrow to accommodate two buses.</li> <li>• The B2130 cannot cope with wide buses, any new bus routes should be serviced by appropriate vehicles and financed in perpetuity via a trust fund set up by the developer as they will not be self financing.</li> <li>• Inadequate capacity on existing bus network</li> <li>• Additional pressures on railway stations practically smaller stations such as Milford</li> <li>• Peak time trains are already full as is evidenced by the fact that SWT already run longer trains to maximise capacity which do not fit onto the platforms.</li> <li>• Rural train stations are poorly serviced out of peak hour times</li> <li>• Site is poorly located in relation to major rail connections</li> <li>• Unsustainable due to poor access to public transport.</li> <li>• The existing network of public transport cannot cope with the overbearing demands and are currently operating at maximum.</li> <li>• Insufficient car parking at the three local stations</li> <li>• One of the main conditions should be that a proper improved transport plan is agreed, including the reinstatement of the railway line between Guildford and Horsham, a light railway or overhead transport system connecting Godalming, Dunsfold, Cranleigh and Guildford.</li> <li>• Can't park in Guildford now, Park and Ride is often full plus difficult if you buy bulky items.</li> </ul>
Sustainability	<ul style="list-style-type: none"> <li>• Inspector refused previous scheme in 2009 because it is an</li> </ul>

	<p>unsustainable location. Acknowledge major change to the planning framework since then (introduction of NPPF), however, the golden thread of the NPPF is 'sustainable development'. As Dunsfold Park is in an unsustainable location, the NPPF requires WBC to refuse the application.</p> <ul style="list-style-type: none"> <li>• Great weight should be given to Inspector's report to the Government dated 6 August 2008 with regard to the inclusion of the site in the South East Plan.</li> <li>• The site is unsustainable and residents would be reliant on motor vehicles.</li> <li>• Care Club Sharing scheme is not feasible</li> <li>• Car sharing clubs never work as it is difficult for participants to get insurance, as they take vicarious liability for people in their care.</li> <li>• The location is not sustainable. The development will not be sustainable.</li> <li>• Residents would be car dependent</li> <li>• Lack of provision for pedestrian and cyclists</li> <li>• No footpaths or safe routes for cyclists to cycle to nearby railway stations.</li> <li>• Mitigation methods such as car-sharing and vehicle hub points are woefully inadequate, not pragmatic and do not provide assurance that an adequate and sustainable transport system will be provided to address the increased demands. In addition they rely heavily on acceptance and execution by the new residents.</li> <li>• Transport Assessment review prepared on behalf of eight local Parish Councils clearly demonstrates that the location is not sustainable</li> <li>• Contravenes with NPPF whose emphasis throughout the document is sustainable development. The site was described as an unsustainable location in 2009 in the Secretary of State decision. Nothing has materially changed since then and the proposal has not significantly altered.</li> <li>• NPPF acknowledges the cumulative effects of planning decisions, and therefore a holistic approach is essential to consider the impact with those of other local developments in order to assess the sustainability of the site.</li> </ul>
Pre-submission Local Plan Part 1	<ul style="list-style-type: none"> <li>• As the development is a huge part of the emerging Local Plan when deciding the merits of the application at Joint Planning Committee, Councillors will also need to decide on the soundness of the pre-submission Local Plan Part 1 and thus the extent to which it can be given weight against</li> </ul>

	<p>contrary saved local plan policies.</p> <ul style="list-style-type: none"> <li>• Weight cannot be given to the pre-submission Local Plan Part 1, over the saved policies of the current 2002 plan, due to the numerous unresolved objections to it and its inconsistency with the NPPF.</li> <li>• Given how close the emerging Local Plan is to being made public, it would be premature under the terms of the PPG for the Council to approve such a significant development and would be in direct contravention of the NPPF.</li> <li>• A new Local Plan would provide justification for imposing a suitable CIL and association Section 206 agreement on the applicant.</li> </ul>
Policy	<ul style="list-style-type: none"> <li>• No pressing need for this development as in the Five Year Housing Supply Statement by WBC (October 2015) there appears to be an adequate supply of development sites to meet the 519 per annum target for the next 5 years.</li> <li>• Does not satisfy NPPF Core Planning Principles No.s 1, 7, 11 and 12</li> </ul>
Prematurity and the local plan	<ul style="list-style-type: none"> <li>• Application is premature and should not be considered prior to examination and adoption of the Local Plan.</li> <li>• Lack of current local plan – this needs to be agreed before a huge planning application is considered. Dunsfold Park are taking advantage of no clear local plan.</li> <li>• Since this proposal is for a new settlement, it should only be considered in the context of a published local plan and not granted in advance of an ad-hoc planning permission. Any such permission would negate the Council’s local plan consultation and undermine public confidence in the planning system.</li> <li>• Approval of the proposal ahead of the Local Plan being finalised would be an affront to local democracy, an arrogant display of “we know best”, a cynical tactical ploy by the council in its bid to get its preferred Local Plan approved and probably judicially reviewable.</li> <li>• Narrow options and low response rate in the New Local Plan Consultation in regards to development at Dunsfold Park</li> <li>• Application is premature to the adoption of the emerging Waverley Local Plan; therefore, it cannot be wholly consistent with it.</li> </ul>
Phasing	<ul style="list-style-type: none"> <li>• Building houses first, then roads, is not acceptable</li> <li>• Provision for retail uses is not consistent with the release of housing</li> </ul>
Previously	<ul style="list-style-type: none"> <li>• It is imperative for Waverley to carry out a detailed survey of</li> </ul>

Developed Land (PDL)	<p>the proposed survey and differentiate what is PDL and what is not.</p> <ul style="list-style-type: none"> <li>• 86% of the land cannot be considered as previously developed land; only the industrial buildings footprint and runway/taxiways should be considered as brownfield.</li> <li>• Over 80% of the land has never been developed.</li> <li>• Paragraph 17 of the NPPF states that PDL is encouraged 'provided that it is not of high environmental value'</li> <li>• Dunsfold Park should be classified as greenfield, not brownfield, due to the landscape character</li> <li>• Proposal does not meet sustainability criteria that state that brownfield land should be developed first.</li> <li>• Planning Policy Guidance 3 (Housing – Revised 2000) Planning Policy Statement 3 (Housing – 2003 as revised) and the National Planning Policy Framework 2012, make it clear that not all of the airfield curtilage should be regarded as brownfield. Therefore only the existing runways and industrial buildings footprints should be regarded as brownfield.</li> <li>• Using the figures supplied by the applicant, the amount of PDL on the site is 74% not 86%. Notwithstanding this, no weight should be given to the fact that parts of the site are brownfield because the site, overall, is not suitable for new development.</li> <li>• The unsustainability of the site, and the damage to the environment, trump the requirement that priority be given to brownfield land.</li> </ul>
More suitable sites	<ul style="list-style-type: none"> <li>• Housing should be distributed proportionally within and around conurbations and with regards to the needs of those communities.</li> <li>• Housing spread evenly across the county in more accessible, less rural locations is more suitable.</li> <li>• Farnham has rail links and some sort of infrastructure whereas Cranleigh and surrounding villages do not yet it is getting the majority of the proposed housing stock.</li> <li>• Wisely Airfield next to the A3 is a far better site.</li> <li>• If additional housing is to be built in Waverley, then it needs to be concentrated in existing towns and villages where there is already infrastructure capable of supporting growing communities.</li> <li>• Housing is needed close to existing employment and not lumped together in one rural location.</li> </ul>
Pollution	<ul style="list-style-type: none"> <li>• Increase in noise pollution, predominantly from vehicles</li> </ul>



	<ul style="list-style-type: none"> <li>• Increased volume of cars, resulting in CO2 emissions</li> <li>• Increase in waste</li> <li>• Light pollution from the proposed development would vastly expand the urban glow into a currently unspoilt rural area.</li> <li>• There will be an increase in particulate air pollution due to the increase in the number of vehicles and the resulting congestion.</li> <li>• Noise, vibration, dirt and air pollution during the construction period for ten years.</li> </ul>
Prior refusal	<ul style="list-style-type: none"> <li>• Does not overcome previous reasons for refusal</li> <li>• No change in circumstances after refusal of a similar application in 2009</li> <li>• The application fails to address the issues of unsustainability raised by the Secretary of State in 2009 following the last application at Dunsfold.</li> <li>• Waverley should remind themselves of the evidence provided in the Public Inquiry with particular regard to the evidence from witnesses on transport issues and the Counsel's closing statements. All arguments that applied then, apply now.</li> </ul>
Scheme mitigation	<ul style="list-style-type: none"> <li>• In the Environmental Statement the measures to mitigate the identified significant negative impacts are inadequate</li> </ul>
Contaminated land	<ul style="list-style-type: none"> <li>• Site lies on contaminated land due to previous use as an airfield and military area, including unexploded ordnance and buried equipment.</li> <li>• A detailed survey of contaminated land is required. Cannot assess the scheme without this assessment.</li> </ul>
Housing need	<ul style="list-style-type: none"> <li>• Mix of dwelling types inappropriate, too many high priced homes</li> <li>• Volume of housing is too much</li> <li>• It is superfluous to actual housing demand – a recent report commissioned by the Parishes demonstrates that the housing need is less than previously stated and therefore Dunsfold Park would create housing in excess of the Borough's actual housing requirement</li> <li>• Development should involve much less housing and be located to the north-east</li> <li>• Figure 7 of the SHMA implies that the majority of housing need in Waverley comes from demographic projections and improved affordability. Therefore, assume that the jobs created on Dunsfold Park New Town have not been included. Highly probable that most of the businesses in the new development would import their staff from outside the local</li> </ul>

	<p>area.</p> <ul style="list-style-type: none"> <li>Waverley's own data demonstrates that there appears to be an adequate supply of development sites to almost meet the housing target of 519 per year. Therefore, no pressing 'need' for development in an unsustainable location at Dunsfold Park.</li> </ul>
Affordable housing	<ul style="list-style-type: none"> <li>The notion is an oxymoron as the remoteness of the area lends itself to a high cost of living; refute the developer's claim that any of the housing will be honestly affordable.</li> <li>Local borough councils have already agreed suitable locations to meet the government's quota for building affordable housing for key workers (250/year).</li> <li>Not sufficient, Waverley need to be concentrating on housing for the young and homeless.</li> <li>Need to ensure the deliverability of affordable housing</li> <li>Inappropriate location for affordable housing</li> <li>Affordable housing provision should be located in areas close to existing infrastructure</li> <li>Onus is on Waverley to explain the definition of affordable housing. Must not mislead people into thinking open-market housing would be priced below open-market values.</li> <li>Expect Waverley to carry out a full assessment of the need for affordable housing in the immediate area of Dunsfold Park rather than a random allocation made based on SHMA figures.</li> </ul>
Proposed land use	<ul style="list-style-type: none"> <li>Concern over increased industrial / commercial uses on the site compared to the 2008/9 proposal. The proposal would create an unsustainable imbalance between industrial and residential uses on the site.</li> <li>The impact of industrial space (54% increase over the existing) would be severe and generate heavy traffic. Warehousing creates fewer jobs and more traffic. Would there be demand for this use in this inaccessible location?</li> </ul>
Design and building heights	<ul style="list-style-type: none"> <li>Contrary to Policy D1 of the Local Plan 2002.</li> <li>It is imperative that there is a clear plan for where each type of development is proposed, and their maximum intended extent (i.e. residential areas, industrial zones, greenspaces, recreational spaces etc).</li> <li>Design features such as the clock tower and 30m high landmark towers are out of keeping with the context, setting and local landscape.</li> <li>Whilst design is regrettably a reserved matter, their clear intentions, to include towers, 4 storey buildings, 240 dph</li> </ul>

	<p>density and a garden city road layout, would not fit into the local landscape.</p> <ul style="list-style-type: none"> <li>• The proposed development is over-bearing, out of scale and character in terms of its appearance compared with existing developments in the vicinity.</li> <li>• We already have too many 4 &amp; 5 bedroom homes in the locality</li> <li>• Potential for significant overshadowing</li> <li>• Density and design of housing are out of character with the area</li> </ul>
Heritage	<ul style="list-style-type: none"> <li>• The proposal will negatively affect the setting of a designated heritage asset – Hall Place Farm (Grade II listed building) which overlooks the application site.</li> <li>• There are several listed buildings around the development site that could be adversely affected by the proposal (High Loxley House and barns, barn at Stovalds Hill, High Billingshurst Farm House, Tickners Heath Farm Cottage and Thatched House Farm House).</li> <li>• Loss of historically significant airfield</li> <li>• The respondent considers that incorrect and misleading information regarding the setting of and impacts on Hall Place Farm has been included in the Design and Access Statement and Environment Statement.</li> <li>• The Historical report (Appendix 9.2) says that the only medieval buildings surviving are outside the 1km study area. This is not true as Hall Place Farm is listed as of 15th Century origin and is shown well within the study area.</li> </ul>
Consultation process	<ul style="list-style-type: none"> <li>• Applicant failed to consult effectively with the community, only one daytime exhibition was arranged.</li> <li>• Reference is being made to the flawed Autumn 2014 consultation. 80% of 3.3% of the electorate has no democratic credibility.</li> <li>• Date of submission (23/12) was at Christmas time meaning that likely objectors were less likely to notice application</li> <li>• Lack of opportunities for community consultation during pre-application</li> <li>• The Making Waves consultation in 2014 (as cited by the applicant) was not formal and relies on residents taking the time to reply and identified four scenarios for where homes in the Borough could be placed, with all options identifying Dunsfold Park as a site for housing. Misled residents to an understanding that the site is recognised for development, prior to any formed policy. This consultation also ignored</li> </ul>

	<p>other options for spreading housing more equitably around the Borough. Applicant attaches great weight to the 3000 respondents, the majority of which presumably do not live in the immediate area.</p> <ul style="list-style-type: none"> <li>• Public Exhibition held on July 2015 in Cranleigh - exhibition was not taken to other affected villages, only 173 attended of which 46 gave written feedback. This is surely an insignificant number? The results from this exhibition are unscientific and statistically insignificant.</li> <li>• No proper consultation with West Sussex residents who live nearby.</li> </ul>
Cumulative impacts	<ul style="list-style-type: none"> <li>• Consideration must be given to the residential development at Broadbridge Heath and resulting impacts</li> <li>• Needs to take into account the approved developments in surrounding areas</li> </ul>
Loss of aviation use	<ul style="list-style-type: none"> <li>• Loss of a sport and recreational aviation amenity</li> <li>• Loss of emergency runway for Gatwick and Heathrow</li> <li>• Development would end the running of the air show, a community event which brings many visitors to the area</li> <li>• With a grave shortage of airport space, particularly for cargo, it seems obtuse to destroy a perfectly good runway and amenities when the nation urgently needs airborne cargo to promote its exports.</li> </ul>
Loss of sports and recreation	<ul style="list-style-type: none"> <li>• Site is used an important motorsport venue, including the Greenpower Electric Car competition for school children.</li> </ul>
Overall balance	<ul style="list-style-type: none"> <li>• Increase in costs to deliver the project do not outweigh the substantial decrease in the quality of the area</li> <li>• Benefits do not outweigh harm</li> </ul>
Other issues	<ul style="list-style-type: none"> <li>• To build a large scale new community in such a remote location will be detrimental to the social cohesion of existing settlements where housing need will remain unaddressed.</li> <li>• Contravenes with saved policy RD1 of the Local Plan (2002) as it is not well related in scale to the existing neighbouring settlements.</li> <li>• Cost to Council of delivering new infrastructure</li> <li>• The fact that the building works would continue for several years must result in an intolerable intrusion into local communities.</li> <li>• Already have too many 4,5 bedroom homes in the locality, perhaps relocating the Royal Surrey Hospital to Dunsfold park would be more sensible.</li> <li>• Lengthy scheduled time for construction works</li> </ul>

	<ul style="list-style-type: none"> <li>• Devaluation of existing houses in the area</li> <li>• Potential to set a precedent of development which could lead to extensive urban sprawl in the area</li> <li>• This development lies directly under the Gatwick Airport flight path.</li> <li>• What happened to all the vehicles left by the Canadian Army at the end of WW2?</li> <li>• Where will the Air Ambulance Land?</li> </ul>
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331 letters of representation were received expressing support for the following reasons:

Location of development	<ul style="list-style-type: none"> <li>• It is important that this application is passed to protect all of the Borough's greenfield sites from development.</li> <li>• It requires no SANGs and doesn't harm the character of any of WBC's main settlements.</li> <li>• This is a fantastic opportunity to develop a large brownfield site and include all the necessary infrastructure, similar to Poundbury in Dorset, which has been very successful.</li> <li>• On balance, a new community with all its new facilities better than incremental additions to existing villages and towns.</li> <li>• In the last enquiry into building a self-sustaining village at Dunsfold Park, the inspector noted the primacy in planning objectives of building satellite developments around a larger conurbation like Guildford over building further and further out from existing town centres. This reduces car journeys where as the later compels dwellers to get in the cars even to get a pint of milk or a newspaper. The Dunsfold Park proposal looks like a fine opportunity to preserve precious and scarce green field land around Farnham.</li> <li>• Would not result in any harm to the Green Belt</li> <li>• The proposal is the best option available for delivering housing</li> </ul>
Employment	<ul style="list-style-type: none"> <li>• The development of Dunsfold Airfield will provide employment opportunities for people.</li> </ul>
Ecology	<ul style="list-style-type: none"> <li>• The impact on Biodiversity is minimal, particularly in comparison to other proposed developments.</li> </ul>
Infrastructure	<ul style="list-style-type: none"> <li>• The site is big enough to accommodate a large number of houses, to enable the planning authority to insist that</li> </ul>

	<p>the developer provides the necessary infrastructure (sewerage and drainage, water supply with adequate pressure, electrical supply, buildings to accommodate schools and medical facilities and a properly designed road layout)</p>
Highways issues	<ul style="list-style-type: none"> <li>• There is space for a New Town but before a development of that size can happen there must be improved transport links both on the A281 through Bramley and tramway or high level reverse magnetism railcar along the disused railtrack from Cranleigh with a spur into the New Town.</li> <li>• The overall impact of the houses required in the borough on traffic will be much lower if the Dunsfold application succeeds than if the houses being delivered by this application were spread more widely across Waverley.</li> </ul>
Housing need and affordable housing	<ul style="list-style-type: none"> <li>• There is a lack of affordable housing in the area, therefore have to commute to work. Supports any development that will enable a better work/life balance. The proposals for Dunsfold Park are a sensible solution to the housing problem where work, but cannot live, in Cranleigh.</li> <li>• With so much pressure on councils to provide housing and facilities for the younger generation this is just the sort of redevelopment of a brownfield site that is needed.</li> <li>• This development will provide much needed housing, on a site that is in severe need of re-development.</li> <li>• The Dunsfold development will be a major step towards establishing the indicated housing need of 519 new homes per annum.</li> <li>• Improve the supply of affordable housing</li> <li>• Waverley has a shortage of appropriate sites for major new housing development.</li> </ul>
Other issues	<ul style="list-style-type: none"> <li>• It is an excellent opportunity to build a self-supporting community with all the amenities and infrastructure, will be of benefit to all Waverley residents.</li> <li>• This proposal is in line with the result of the public vote on the options that WBC put forward for the local plan.</li> <li>• This proposal will enable the Jigsaw Trust to continue to provide education and care for children and young adults with autism.</li> <li>• Since 2010 there has been a rapid increase in the</li> </ul>

	<p>crime rate in commuter areas surrounding large cities and there are signs that this is spreading to more rural areas.</p>
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3 letters of representation have been received making the following general observations:

- Consultation period too short
- This site has been refused before, why is tax payers money being wasted?
- Site used an important motorsport venue, including the Greenpower Electric Car competition for school children.
- This proposal will enable the Jigsaw Trust to continue to provide education and care for children and young adults with autism.
- The fact that the building works would continue for several years must result in an intolerable intrusion into local communities.

Following submission of additional and amended information on 01/09/2016, a further consultation was undertaken for comment from local residents. The neighbour notification letters were sent on 07/09/16 and the application was re-advertised in the newspaper on 16/09/16.

3371 letters of representation raising objection were received following the re-notification. The majority of comments received did not raise any additional substantive issues over that summarised above. However, the following additional comments were made:

<p>Transport and traffic</p>	<ul style="list-style-type: none"> <li>• Number of car trips as a result of the development is underestimated and the assumed route distribution is seriously flawed.</li> <li>• The Dunsfold area would suffer from between 350 and 670 HGV movements a day once completed.</li> <li>• No mitigation proposed for A281.</li> <li>• Parking barns is an absurd idea - all roads should be wide enough to take two parked cars and an emergency vehicle</li> <li>• Waverley's 'Assessment of Transport Sustainability' highlights that Farnham is the most sustainable location for development, not Cranleigh area.</li> <li>• Developer uses flawed and historic evidence to support the application. In some cases the evidence, for example with regard to transport infrastructure, bears no relation to the real life traffic, safety and health</li> </ul>
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	<p>issues faced daily by residents of the Borough.</p> <ul style="list-style-type: none"> <li>• No evidence that the additional material received overcomes the issues raised previously, with particular regard to transport and highways concerns.</li> <li>• Impact of traffic on Bramley</li> <li>• No Construction Transport Management Plan has been provided. An indication of mitigation measures to limit impact of construction traffic should be provided at Outline stage.</li> <li>• Markwick Lane, noted as a 60mph road for access to Milford station, is a stop-start single track road.</li> <li>• No conclusion recognising the challenge in preventing minor roads being used as rat-runs.</li> <li>• The proposed Site Wide Travel Manager is welcomed, but the data to support this is taken from existing cities which do not compare to Dunsfold New Town in terms of opportunities for the residents in terms of travel choices.</li> <li>• Over 50% of school trips will be off-site (post-primary education) and none of the provisions under 'School Travel Plan Measures' measures will apply.</li> </ul>
Public transport	<ul style="list-style-type: none"> <li>• The proposed bus route through Chiddingfold Road and High Street Green would require a large sum of money to upgrade these roads due to their poor condition and poor profiles which leads to vehicles coming off the road.</li> <li>• No suggested minimum bus service frequencies are given for the development period.</li> <li>• The proposed bus service frequencies, after completion, are only 'if there is demand for such a frequency', so there is no guarantee of any level of service.</li> <li>• No Section 106 agreement or sums of money mentioned, so no certainty that adequate bus services will be provided after 2032.</li> </ul>
Travel Plan	<ul style="list-style-type: none"> <li>• The Travel Plan is not realistic, given the rural location of the site. The only way a Travel Plan would succeed is with inclusive involvement from the local community, which has not happened.</li> <li>• Expect to see from a Travel Plan a high degree of stakeholder ownership and input into the future, which is missing.</li> <li>• The proposed Transport Review Group (TRG) is too</li> </ul>



	<p>small, unrepresentative and weighted towards the site owner (half of the 4 member group are representatives of the owner).</p> <ul style="list-style-type: none"> <li>• Funding decisions of the TRG will not be transparent.</li> <li>• The Section 106 referred to has no certainty as there is no draft S106 provided by the developer.</li> <li>• The Management Structure should include a more accountable Transport Executive Group (TEG) and a Local Transport and Development Forum (LTDF)</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Proportion of sheltered accommodation should be increased given the need for housing the elderly.</li> <li>• Area of each garden should be at least the floor area of the corresponding house in order for it to be family friendly.</li> <li>• WBC used incorrect data for its SHMA and a revised OAN figure, over 20% lower, means that 400 houses per year are required, not 519. Therefore, no need for Waverley to develop Dunsfold Aerodrome.</li> </ul>
Infrastructure	<ul style="list-style-type: none"> <li>• An undertaking is required to ensure the school and health centre are completed before houses are built.</li> <li>• In droughts, consumers are required to conserve water. Adding 7000 consumers here without increasing reservoir capacity could lead to considerable criticism.</li> <li>• If onsite shops fail, this will add pressure to local services.</li> <li>• Developer's timetable for key infrastructure is too late - should come hand in hand with the development, not after.</li> <li>• No secondary school proposed - where would children go after they reach 11 years old? Existing schools do not have capacity.</li> </ul>
Heritage	<ul style="list-style-type: none"> <li>• The impact on Hall Place Farm has not been assessed.</li> <li>• Harm the historic character of Dunsfold - a village not a town.</li> <li>• Dunsfold Park has been classified a non-designated heritage asset by Historic England which bestows a level of protection and is a material consideration in this application.</li> </ul>
Brownfield land	<ul style="list-style-type: none"> <li>• Challenge the 82% brownfield land at Dunsfold Park, as identified within Local Plan, as it is based on an incorrect reading of an Inspector's report in 2009. The Inspector refers to 50% of the site as brownfield land, approximately.</li> </ul>

<p>Consultation</p>	<ul style="list-style-type: none"> <li>• Flawed consultation carried out by WBC in 2014. The consultation was poorly conceived and badly executed with the results misrepresenting the views of the people that responded. The use of the results to justify the plan or any planning decisions is a gross misrepresentation and distortion of the consultation process.</li> <li>• There has been no further community involvement since 2014 except 1 poorly attended exhibition held by the developer.</li> <li>• The developer was given access to the Councillors to brief them confidentially of the proposed development on 23 February 2016, well after the receipt of the application. This is contrary to good governance and transparency.</li> <li>• The Council has failed against its own Statement of Community Involvement.</li> </ul>
<p>Other issues</p>	<ul style="list-style-type: none"> <li>• Not surprising that Farnham voted for Dunsfold to accommodate a large proportion of the housing need during the Options consultation for the Draft Local Plan. However, the support for the site was not 80% of the Waverley population, rather 80% of the 52% that live in Farnham and other areas. This decision should be made on true facts.</li> <li>• Questions the legality of the disposal of the Aerodrome - refers to the Crichel Down Rules with regard to re-sale to previous owners following compulsory purchase. An inquiry into the legality of the commercial disposal of the aerodrome by the government should be held.</li> <li>• Proposed land use plans have not been provided.</li> </ul>

15 additional letters of support were received expressing support for the following reasons:

- The number of homes at Dunsfold should be at least doubled to be in line with the Options scenario voted for by the Borough.
- Failure to include the Dunsfold site in the submission of the Local Plan was key to the failure of the plan.
- Three benefits to the majority of housing at Dunsfold: close to the industrial/office area; the more houses on Dunsfold, the greater support there would be for the new school, doctors surgeries, shops and social facilities; would provide a major contribution to infrastructure.
- Smaller piecemeal development does not contribute to the transport infrastructure requirements.

3 additional letters of representation were received raising the following general observations:

- No objection, but there are issues that need to be resolved with regard to transport routes and contributions from the developer to provide a new highway from Horsham to the A3 bypassing villages.

#### Submissions in support

In support of the application, the applicant has made the following points:

Delivery of new homes to help meet the identified housing need in the Borough.

- A total of 1,800 homes equating to 3.5 years supply of housing.
- Homes located on a previously developed site that is not subject to environmental constraints such as AONB and Green Belt designations. This will reduce the pressure for the release of sites that lie within these designations elsewhere in the Borough.
- Early delivery with 50% of the new homes constructed within 5 years of the grant of planning permission.
- A mix of 1, 2, 3 and 4+ bed homes providing a range of dwelling sizes to meet the needs of the full range of the community including first time buyers, couples, families and downsizers. The unit mix will be established through reserved matters submissions having regard to Policy H4 of the Local Plan and the up-to-date need set out in the Strategic Housing Market Assessment.
- A mix of houses and flats providing a range of housing typologies for new residents.

7,500sqm of care accommodation (Use Class C2) amounting to approximately 75 extra care units.

- These will provide high quality accommodation delivering care to the elderly in an environment that enables them to live independently for longer. This will also free up housing in the Borough as residents move into the care accommodation.

Retention and expansion of the successful Dunsfold Business Park.

- Securing the long term future of the existing business park and the jobs it provides.
- Rationalising the existing Park through selective demolition of older buildings, retention of existing buildings and construction of new buildings all making a more efficient use of the site with purpose-built facilities.

- Increasing the total quantum of employment floorspace (Use Class B) from 44,721sqm to 68,866sq.m, a net increase of 24,137sqm.
- It is anticipated that some 2,750 jobs will be provided at Dunsfold Park, a net increase of 2,050.
- Provision of a range of new floorspace across the B Class uses to create a diverse business environment. This includes 3,700 sqm flexible B1(a) or B1(b) office or research space; 7,500sqm flexible B1(c) or B2 general industrial space; 11,000sqm of B8 warehousing space; and 9,966sq.m of flexible B1(b), B1(c), B2 or B8 space.
- A range of unit sizes including Small-Medium Business Enterprise space that will appeal to startup companies and small businesses.

A range of retail and local facilities that provide for the day to day needs of local residents without competing with other local centres such as Cranleigh.

Provision of the social infrastructure needed to support the development and ensure that the impact of new residents on local facilities is acceptable.

- A new medical centre to provide healthcare for new residents of Dunsfold Park and some existing nearby residents. The nearby Chiddingfold Surgery has indicated its ability and wish to take on the new facility.
- Provision of a new primary school on site including space for a pre-school along with the provision of the existing Jigsaw School for children and others with autism in new and larger premises located at the heart of the new village.
- Community centre at the heart of the new village.
- Financial contributions towards improvements to secondary school provision in Cranleigh.

#### Economic benefits

- 461 full time equivalent construction jobs over the complete 10 year build period of which 90% will be located on site. This provides skilled employment in the area in the short and medium term and supports construction related businesses off site.
- Generation of approximately £9.6million in New Homes Bonus over a period of 5 years.

#### Sustainable development

- A development enshrined with sustainable transport choices and also one that provides improvements to transport infrastructure that will facilitate the new development and also benefit existing residents in the area.
- Provision of a range of social infrastructure on site to minimise the need for residents to travel away from the village.

- A layout that encourages residents to walk and cycle with all dwellings within a 10 minute walk of the village centre. Shared surface streets and dedicated footways and cycleways link to the village centre.
- Enhancement of the cycle route between the site and Cranleigh.
- Establishment of a car club on site for the residential and employment use
- Travel Plans for the proposed uses that set out a full range of measures to encourage sustainable transport choices such as a car share scheme, cycle hire, discounted cycles available to purchase, support in the form of cycle repair facilities and information packs on cycle routes.
- Improvements to three local bus routes supported from first occupation to link residents and employees at Dunsfold Park to key destinations. These are to be Dunsfold Park – Guildford; Godalming – Dunsfold Park – Cranleigh; Cranleigh – Dunsfold – Horsham.
- Traffic signal improvements and/or associated road widening at junctions along the A281 to improve traffic flows.

#### Provision of outdoor space and recreation

- The new village is set within 134 hectares of landscaped parklands. Publically accessible open space will run through the new village providing open space for new and existing residents and improved pedestrian and cycle links to the surrounding area.
- The Benbow Country Park comprising a 103 hectare park for recreation but will also enhance biodiversity.
- The Market Square at the heart of the new village. This will be designed as a community outdoor space suitable for a range of events and markets.
- The 7.5 hectare Runway Park, a series of landscaped spaces that link the village and Market Square with the parkland.
- Green Wedges between residential areas to create a pleasant landscaped setting.
- Space for formal sports pitches including 2 junior football pitches and 2 senior football pitches, a cricket pitch and 3.3 hectares of space for informal games.
- Play areas distributed across the site. This includes 23 Local Area Play sites throughout the residential areas, 2 equipped Neighbourhood Areas of Play and 4 equipped Local Areas of Play.
- A new canal basin to the Wey and Arun Canal to aid the aspiration for recreational use of the canal.
- Sections of the park are designed to allow for seasonal storm water to integrate the drainage scheme for the new development into the landscape.

An ecological strategy that seeks to protect the existing biodiversity of the site wherever possible and propose mitigation and enhancement measures to improve the site's overall biodiversity value.

#### High level of sustainability

- The new build commercial floorspace will meet BREEAM Very Good level with an aspiration to achieve higher. This represents a high level of sustainability and will reduce the development's contribution to climate change.
- The sustainability standard for the residential dwellings will be reviewed against the requirements of the forthcoming Home Quality Mark, a voluntary replacement to the Code for Sustainable Homes.

Delivering a significant amount of development on one site enables there to be a better coordinated and timely delivered package of mitigation. When there is a series of small developments that could come forward at any time over the Local Plan period, it is harder to manage and deliver necessary infrastructure. A number of developments may individually be under the threshold to trigger certain infrastructure improvement, whether this be highway improvements, primary school capacity or sports provision, for example. Collectively and cumulatively, however, a number of developments can trigger the need for significant improvements to such facilities. Those early developments may not be required to make contribution, whilst those later developments may be faced with a significant financial burden that could jeopardise their delivery. Dunsfold Park is a single development proposal with a phasing strategy that can clearly present when infrastructure improvements would be made against the build out of the development; such certainty is a tangible benefit of the development.

#### Determining issues

- Principle of development
- Planning history and differences with previous proposal WA/2008/0788
- Changes in circumstances since appeal decision WA/2008/0788
- Prematurity
- Fall back position post 2018
- Previously Developed Land (Brownfield)
- Brownfield land register
- Garden Village expression of interest
- Compliance with Policy SS7 of the Pre-Submission Local Plan Part
- Environmental Impact Assessment
- Location of development
- Loss of airfield and existing employment uses

- Proposed employment uses
- Main Town Centre Uses
- Loss of agricultural land
- Impact on the countryside
- Impact on landscape character and AONB/AGLV
- Light pollution, impact on dark skies and tranquillity of the AONB
- Highways, access and parking
- Public Rights of Way and impact on the Wey and Arun Canal
- Housing land supply
- Housing mix
- Affordable housing
- Proposed care accommodation
- Custom / Self build requirement
- Design / Layout
- Impact on residential amenity and compatibility of uses
- Standard of accommodation for future occupiers
- Provision of amenity space, play space and sports facilities
- Biodiversity and compliance with Habitat Regulations 2010
- Flood risk and drainage
- Utilities
- Impacts on Heritage Assets
- Air quality
- Land contamination
- Archaeology
- Infrastructure
- Financial considerations
- Cumulative effects/in-combination effects
- Crime and disorder
- Health and wellbeing
- Consultation
- Accessibility and Equalities Act 2010 Implications
- Human Rights Implications
- Pre Commencement Conditions
- Responses to issues raised by Third Parties and Parish Councils
- Secretary of State call in-process

## **Planning Considerations**

### Principle of development

The planning system is a plan led system. Planning law requires and that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

The planning application is a Hybrid planning application which seeks permission partly in full and partly in outline form for the following development:

- Full permission is sought for the permanent change of use of existing commercial buildings on site, which make up the existing business park. (The temporary use of these buildings for flexible Classes B1 Business, B2 General Industrial, and B8 Storage or Distribution uses currently exists up until April 2018).
- Outline permission is sought for the proposed new settlement, as detailed above. All detailed matters are reserved. Therefore the applicant is seeking determination from the Council on the principle of the proposed new settlement only. This includes as assessment of whether the applicant has demonstrated that the proposal for 1,800 dwellings, associated proposed facilities and the expansion of the business park could be successfully accommodated upon this site in planning terms.

The reserved matters, which do not form part of the current planning application, therefore comprise: -

- **Access** – the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network.
- **Appearance** - aspects of a building or place which affect the way it looks, including the exterior of the development.
- **Landscaping** - the improvement or protection of the amenities of the site and the area and the surrounding area, this could include planting trees or hedges as a screen.
- **Layout** - includes buildings, routes and open spaces within the development and the way they are laid out in relation to buildings and spaces outside the development.
- **Scale** - includes information on the size of the development, including the height, width and length of each proposed building

The current application does, however, provide indicative details in respect of the proposed access.



The NPPF at paragraph 6 states that the purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

The NPPF at paragraph 197 provides the framework within which the local planning authority should determine planning applications. It states that, in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.

Paragraph 14 of the NPPF defines the presumption in favour of sustainable development as approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless: *inter alia* any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or specific policies in this framework indicate development should be restricted.

Paragraphs 17 and 111 of the NPPF encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.

The Government has expressed clear support for the development of new Garden Villages. Paragraph 52 of the NPPF states that “the supply of new

homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.”

The site is located within the Countryside beyond the Green Belt outside any defined settlement area. The NPPF states that, as a core planning principle the intrinsic character and beauty of the countryside shall be recognised. Policy C2 of the adopted Local Plan 2002 states that building in the countryside, away from existing settlements will be strictly controlled.

Policy C2 is a housing supply policy for the purposes of paragraph 49 of the NPPF. Paragraph 49 states that “Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.”

The latest housing land supply figures published on the 1/7/2016 confirm that the Council can demonstrate a 5 year supply of housing land. Policy C2 of the adopted Local Plan is therefore considered to carry substantial weight; however, it should be noted that this is not full weight as Policy C2 does refer to protection for ‘its own sake’, whereas the NPPF places emphasis on protecting the intrinsic character and beauty of the Countryside.

The Council’s ability to demonstrate an adequate supply of housing does, however, rely upon the Council’s published Pre-submission Local Plan Part 1, as it relies on some allocated sites for delivery. This includes a portion (130) of the housing proposed as part of this application.

Paragraph 7.55 of the Waverley Borough Local Plan 2002 states that “A study was commissioned in 1999 to assess the economic, social and environmental impacts of the closure of aerodrome and to identify ways forward. The position regarding the future of Dunsfold Aerodrome continues to change. In view of this, it would be premature to include specific policies in the Plan. It may be appropriate that Planning Guidance supplementary to Policy C2 and/or a Planning Brief should be prepared at a future date.”

Policy SP1 of the Pre-submission Local Plan Part 1 2016 states that the Council will apply a presumption in favour of sustainable development.

Policy SP2 of the Pre-submission Local Plan Part 1 sets out the Council’s Spatial Strategy to 2032 and refers to the allocation of strategic sites under Policies SS1-SS9 to meet the majority of the housing needs for the Borough:

“To maintain Waverley’s character whilst ensuring that development needs are met in a sustainable manner, the Spatial Strategy to 2032 is to:

1. Avoid major development on land of the highest amenity value, such as the Surrey Hills Area of Outstanding Natural Beauty and to safeguard the Green Belt;
2. Focus development on the four main settlements (Farnham, Godalming, Haslemere and Cranleigh)
3. Allow moderate levels of development in larger villages (Bramley, Chiddingfold, Elstead, Milford and Witley) whilst recognising that due to Green Belt constraints Bramley has more limited scope for development;
4. Allow limited levels of development in/around other villages (Alfold, Churt, Dunsfold, Ewhurst, Frensham, Tilford, Shamley Green, Wonersh), whilst recognising that those villages not within Surrey Hills AONB or Green Belt offer more scope for growth
5. Allow only modest growth in all other villages to meet local needs
6. Maximise opportunities for the redevelopment of suitable brownfield sites for housing, business or mixed use, including at Dunsfold Aerodrome which is identified as a new settlement. More details are given in Policy SS7.
7. Allocate other strategic sites (Policies SS1 – SS9). Non-strategic sites will be identified and allocated through Local Plan Part 2 and Neighbourhood Plans
8. Ensure that where new infrastructure is needed, it is provided alongside new development, including funding through the Community Infrastructure Levy (CIL).”

Policy SS7: “New settlement at Dunsfold Aerodrome” of the Pre-submission Local Plan Part 1 states that Dunsfold Aerodrome is to be allocated for mixed use strategic development to accommodate housing, employment and associated supporting uses. The weight to be attached to this policy is dependent on the degree of unresolved objections to it. At this stage, for the reasons set out later in the report, only limited weight can be attached to it.

In terms of the current adopted Local Plan Policy C2, the principle of development would be unacceptable. However, whilst this policy has a

timeless element in terms of protection of Countryside beyond the Green Belt, account must be taken of the NPPF presumption in favour of sustainable development and its encouragement to use brownfield land (which is discussed at greater length below) as well as the emerging Pre-submission Local Plan Part 1 policies.

Policy SS7 of the Pre-submission Local Plan Part 1 allocates Dunsfold Aerodrome to provide a new settlement to accommodate housing, employment and associated supporting uses. Policy SS7 therefore supports the principle of development of the site, and is informed by the encouragement of the NPPF to make use of brownfield land.

Paragraph 52 of the NPPF states that “the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.”

Based on the Council’s continued commitment to support the pre-submission Local Plan Part 1, evidenced by its publication of the plan under Regulation 19 and the Council’s approval to submit the Plan to Government on 29th November 2016, officers therefore consider that the broad principle of development upon this site should be regarded as acceptable as it would comply with the draft Policy SS7 and the NPPF’s encouragement for new development to take place on brownfield land.

However, the acceptance of the principle is subject to the Council being satisfied that the applicant has demonstrated that the scale and quantum of development can be satisfactorily accommodated upon this site, including in terms of impact upon the countryside, infrastructure and all other relevant planning considerations. In accordance with Paragraph 14 of the NPPF, any adverse impact of granting permission would need to significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF as a whole.

#### Planning history and differences with previous proposal WA/2008/0788

The planning history is a material consideration in the determination of this application. The planning history assists with regard to the lawful use of the site, which is set out below and also assists in the understanding of what parts of the site constitute previously developed land and is an important material consideration.

The site is subject to extensive site history; the key decisions can be grouped into

a) those relating to temporary uses, time expiring 01/06//2018

- WA/2009/1891 - temporary permission granted for filming on site up until 1 June 2018.
- WA/2007/0373 and WA/2007/0372 – change of use of buildings for a mix of Classes B1 Business, B2 General Industrial, and B8 Storage or Distribution uses for a temporary period, with the most recent permission being up until 1 June 2018.

The temporary permissions remain in place up until 1 June 2018. From this point, and taking account the Inspector's conclusions in respect of WA/2011/0520, the use of the site would lawfully revert to the repair, maintenance and flight testing of aircraft associated with HM/R4624 (1951). Accordingly, the Council could enforce the cessation of the temporary uses after 2018, although the expediency of such action, given the longevity of their operations on the site, would need to be carefully considered by the Council in the interests of proportionality and reasonableness, particularly pending agreement of the long term strategy for the site.

b) those relating to the lawful use of the land to which the site would revert if the current application is not approved/implemented and/or the permissions due to expire in 2018 are not renewed:

- WA/2011/0520 – Lawful Development Certificate dismissed on appeal for various uses associated with the airfield.
- HM/R4624 – Erection, repair and flight testing of aircraft

c) the previous application/appeal for a new mixed use settlement under WA/2008/0788, this was dismissed on grounds of prematurity, highway capacity issues and sustainability concerns. Critically, in relation to this case, Members will need to consider the differences with the current proposal and the material changes in circumstances that have occurred since that decision.

- Changes in policy circumstances

It is clear that there have been significant changes in policy at national/regional level since the last appeal decision in 2009. The abolition of the 2009 South East Plan and the publication of the National Planning Policy Framework and the National Planning Practice Guidance being the most significant. It is also a material consideration that Dunsfold Park has been included as an allocated strategic site within the Council's pre-submission Local Plan Part 1. The Plan was published for its Regulation 19 consultation on 19/08/2016 and the consultation period expired on 03/10/2016. The Council approved the Plan for submission on 29/11/2016. Significant weight

can be given to the policies of the Pre-submission Plan in the determination of this application, subject to the degree of unresolved objection. It is acknowledged that a significant number of objections have been raised in relation to the allocation of the site in the emerging Local Plan. This limits the weight that can be given to this element of the draft plan.

The adopted Local Plan remains as it was in 2009 albeit the publication of the NPPF has altered the weight that can be attached to some of its policies.

The following table summarises the key changes in the relevant policies/guidance.

<b>Policies at time of appeal decision</b>	<b>Current policy</b>
Waverley Borough Local Plan 2002 Planning Policy Statements: PPS1, PPS3, PPS7 and PPG13, Surrey Structure Plan South East Plan	National Planning Policy Framework National Planning Practice Guidance Waverley Borough Local Plan 2002 Local Plan Council's Pre-submission Local Plan Part 1 2016

There has now been updated guidance in respect of what constitutes previously developed land. In respect of the appeal under WA/2008/0788, the Secretary of State advised “(The Secretary of State) has also taken account of the Inspector’s comments at IR355-358, and he agrees with the Inspector that the operational part of the aerodrome, including the runways and interstitial grassed areas, is previously developed land (IR358)”. Further information on this is contained below within the “Previously Developed Land” section of the report. The applicants have advised that taking into account the Inspector’s comments, the operational part of the aerodrome amounts in numerical terms to 86%. At the time of the appeal, previously developed land was recognised a priority for development. This is carried through into the NPPF (paragraphs 17 and 111) which encourages the effective use/re use of Previously Developed Land (PDL). The NPPF defines PDL as:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure

or fixed surface structure have blended into the landscape in the process of time.”

Paragraph 32 of the NPPF changes the threshold for assessing the impact of transport effects, stating that they should only be refused where the impact would be “severe” in relation to the capacity of the network. This is a less stringent test than that contained within PPG13 which required that development should avoid a “significant” impact on local road networks.

The NPPF also introduces a presumption in favour of sustainable development (paragraph 14), this requires that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

The Government has expressed clear support for the development of new Garden Villages. Paragraph 52 of the NPPF states that “the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.”

<b>PDL position – appeal</b>	<b>PDL position – current application</b>
PDL 86% of land PDL (the operational part of the aerodrome)	PDL position confirmed by the Secretary of State Para. 17 and 111 – encourages effective use / re-use of PDL

The application site remains on land designated as Countryside beyond the Green Belt. It was concluded as part of the 2008 appeal that the proposed development would not cause material harm to the character or appearance of the countryside, and would comply with Policies C2, D1 and D4 of the Waverley Borough Local Plan. The weight to be attached to Policy C2 is now reduced. However, the emphasis on protecting the character and appearance of the countryside remains.

<b>Countryside local plan policies – appeal</b>	<b>Current position</b>
Waverley Borough Local Plan C2	Para.17 of NPPF – protection of countryside and intrinsic value  Policy C2 now carries significant, but not full weight. The NPPF does not

	recognise the protection of Countryside for its own sake.
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The role of the current application is much more significant in terms of meeting the Borough's housing land supply needs. When determining the 2008 application, the Inspector gave little weight of the contribution toward HLS, as it would not address housing supply in years 1 – 5. The applicants have stated that the proposed scheme would deliver some housing within the next 5 years - 332 dwellings, therefore adding new weight to this argument. Notwithstanding, the Council's own assessment indicates delivery of 130 homes. The tests for deliverability of sites within the NPPF are also more stringent than the former PPS3.

At the time of the appeal in 2009 the housing target was to deliver 5,000 homes between 2006 and 2026 (i.e. 250 dpa). The NPPF introduced the requirement to seek to meet the full objectively assessed need (OAN) for market and affordable housing as far as is consistent with policies in the NPPF (para 49). In Waverley's case, the OAN is 519 homes per annum. This represents a significant increase over the 250pa which is the context against which the 2008 application was considered.

The Dunsfold site is now allocated within the Pre-Submission Local Plan Part 1 and forms part of the Council's 5 year housing land supply.

<b>Housing Land Supply position - appeal</b>	<b>Current Housing Land Supply Position</b>
2008 – The Housing Land Supply was sufficient to meet the South East Plan requirements (250 dw p/a) – proposal was not required to meet current supply; only for years 6+	5.3 years housing land supply. This includes a number of houses coming forward at Dunsfold within the next 5 years. Dunsfold is promoted as a strategic site (Policy SS7) in Pre-Submission Local Plan Part 1 and will be key in housing delivery in the longer term.  Presumption in favour of sustainable development

In summary, changes to the national planning policy context, in respect of Previously Developed Land and with respect to the housing land supply and the need to meet objectively assessed housing needs, add further weight to the case for housing development at Dunsfold in comparison with the consideration of the previous appeal.



- Differences on site

Since the time of the last appeal, there have been some additional temporary buildings constructed, and a number of temporary uses have taken place within this period. The temporary buildings include those associated with the Jigsaw school which would be relocated as part of the current proposal. However, taken in the context of the site as a whole, these changes are considered not to materially alter the site's characteristics.

- Changes to the proposal

In comparison with the appeal scheme, the following changes are noted:

- 1,800 units proposed rather than 2,601
- Commitment to provide a Bus Service in perpetuity and Community Trust to manage and fund the service provision
- Updated transport evidence and modelling
- Delivery of some homes within 5 years of commencement
- Revised indicative layout

d) the recent full permanent permissions for employment uses

- WA/2015/0695 – Erection of 6 buildings to provide for 9,966 sqm of B1(b), B1(c), B2 and/or B8 flexible use floorspace with associated parking, servicing, landscaping and works to existing access road following demolition of existing buildings
- WA/2016/0634 - Application under Section 73 to vary conditions 1, 2 and 10 of WA/2015/0695 (plan numbers, revised floor area and use) to allow increase in floor area and D1 Use Class.
- NMA/2016/0064 - Amendment to WA/2015/0695 to provide alterations to elevations to Unit 1 & 2; relocation of units 4 & 6; increase of car parking spaces.

## Approved site plan WA/2015/0695:



This permitted the erection of 6 permanent buildings for flexible B1 Business, B2 General Industrial, and B8 Storage or Distribution uses. The 9,966 sq.m of additional floorspace resulting is included within the proposed extension to the business park under the current outline application. Given that this element has already been granted permission under WA/2015/0695, this is highly material in assessing the proposed employment uses in the current application.

### Prematurity

Annex 1 of the National Planning Policy Framework explains how weight may be given to policies in emerging plans. It states that decision makers may give weight to relevant policies according to: the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given); the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and the degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

However, in the context of the Framework and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would

significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:

a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or Neighbourhood Planning; and

b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

Refusal of planning permission on grounds of prematurity will seldom be justified where a draft Local Plan has yet to be submitted for examination, or in the case of a Neighbourhood Plan, before the end of the local planning authority publicity period. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the plan-making process.

Officers have sought advice from Counsel with regard to the position on Prematurity in terms of its relationship with the pre-submission Local Plan Part 1.

The Pre-submission Local Plan Part 1 has now been agreed for publication and has gone through the Publication for Pre-Submission (Regulation 19) Consultation, which closed on 3 October 2016. The Council has agreed (on 29 November) to submit the Plan for examination in December.

Within that, draft Policy SS7 identifies the application site. It proposes allocating the site as a strategic site for a new settlement of up to 2,600 homes, employment and associated supporting uses. One of the policy requirements is for necessary highway improvements to mitigate the impact of the development on the surrounding road network. Provision is also made for a package of sustainable transport measures to be provided.

Consideration needs to be given to the previous decisions made by the Council and the Secretary of State (SoS) following the recovered planning appeal in 2008/2009 (Planning Reference: WA/2008/0788 and Appeal Reference: APP/R3650/A/08/2089143).

Within the decision letter of 24.9.09, now 7 years ago, the SoS accepted the Inspector's conclusions in relation to prematurity on the application then advanced, and that was one of the reasons for refusal. The decision letter and report dealt with the issue at DL/30 and IR/385-387 respectively. These decisions are attached at Appendix 1 of this agenda.

The Secretary of State, following the Inspector's Report, on WA/2008/0788 in respect of prematurity stated at Paragraph 30 that:

"30. The Secretary of State has had regard to the Inspector's comments that the Council faces a challenge is deciding how to accommodate the residual South East Plan housing requirement for Waverley to 2026 and agrees that, within this context, for the reasons set out at IR382, the appeal proposal has many advantages (IR362). Like the Inspector (IR386), the Secretary of State has also had regard to the requirement in PPS3 that local planning authorities should not refuse applications solely on grounds of prematurity. For the reasons set out at IR385-IR387, the Secretary of State agrees with the Inspector that, with regard to the presumption against the refusal of planning permission on grounds of prematurity, there are exceptional circumstances in this instance (IR386), and that a decision to allow the Eco-village to proceed as (sic) this stage, prior to the formulation of the Local Development Framework, would be premature and would effectively pre-empt the proper consideration of alternatives as part of the development planning process (IR387)."

It is considered that there were very specific circumstances prevailing at that stage. They are set out at paragraph 386 of the Inspector's decision letter and include the view of the Examination in Public (EiP) Panel and that of the Secretary of State (in relation to the SEP / EcoTowns) at that time, and that the proposal represented some 60% of the Borough's housing supply for the remaining life of the SEP, in one location.

The Panel had concluded that the proposal would seriously unbalance the Regional Strategy and be likely to be unsustainable giving rise to very serious harm [IR/180]. In those circumstances, the Inspector concluded that the proposal was fundamentally in conflict with the Regional Strategy [IR/179]. The application in that case was for some 2,601 units, rather than the 1,800 currently proposed.

In contrast to the situation at the time of the appeal WA/2008/0788, there is no continuing suggestion that permitting the development now would seriously unbalance any regional concerns. The proposal comes forward against a substantially changed policy framework where the SEP has been revoked, PPS1 and PPS3 have been replaced by the NPPF with its "step change"

approach to housing delivery; and the Council is required to provide greater levels of housing provision in light of the previous failure of the Core Strategy (hence the 2014 consultation).

The proposed development amounts to 18% of the total housing need across the plan period. It therefore follows that, even if the planning application succeeds, it is far less likely to undermine or predetermine decisions that are required to be made under the plan to find the remaining 82%.

The site is also subject to an allocation within the draft Local Plan – Part 1 for up to 2,600 homes. Whilst the application proposes 1,800 homes, it is considered that if this number of dwellings were approved, this would not undermine the delivery of a further 800 units through the plan period at Dunsfold Aerodrome. As such, it would not undermine the delivery of the housing agreed by the Council under the Draft Local Plan – Part 1. For all those reasons, in the Council's view the first stage of the normal two stage test is not met.

The plan has not yet been subject to initial consideration by an inspector or examination. It seems clear from experience that nearly all emerging local plans submitted require further changes by way of main modifications prior to successful adoption. The need for the plan to be at an advanced stage is a requisite part of the normal two stage test set out in the NPPG (above). It is not considered, based on the its current progress that the plan can be considered to be at an advanced stage.

Fundamentally, the proposal is consistent with the pre-submission Local Plan Part 1, which allocates Dunsfold Park as a strategic housing and would not undermine delivery of the greater allocation of 2,600 homes, nor does it predetermine a decision on 82% of the Borough's housing delivery.

This conclusion takes into account the up-to-date position that there is likely to be a fairly narrow timeframe between the likely determination of the planning application and submission of the Local Plan to the Secretary of State.

For the reason set out above, which is supported by Counsel's advice, it is the officers' view that the Council would not be able to reasonably sustain a reason for refusal on the grounds of prematurity.

#### Fall back position post 2018

A 1951 planning approval granted a permanent permission for the use of the site as an airfield, to include the repair, maintenance and flight testing of aircraft, including up to 5,000 flights per annum. The decision upon

WA/2011/0520 (refused by the Council and dismissed on appeal), established that this 1951 permission does not constitute a consent for unrestricted flying.

Since then, temporary permissions have been in place for the use of a number of buildings within the site for B1 Classes Business, B2 General Industrial, and B8 Storage or Distribution uses and ancillary flying and use of the aerodrome for temporary uses, upon which restrictions of the use have applied and have also removed the restriction for only BAe to operate from the site. The key permissions establishing this position are WA/2007/0372 & 373.

Following the expiry in 2018 of the temporary permissions, including the overarching 2007 permission, the lawful use of the site would arguably revert to that authorised by the earlier approval (1951). The applicants have not provided evidence of the potential level of development and impact intensity likely to occur, following the expiry of the temporary permissions.

#### Previously Developed Land (Brownfield)

Paragraph 17 of the National Planning Policy Framework 2012 outlines the overarching roles that the planning system ought to play. A set of 12 core planning principles are set out which should underpin both plan-making and decision-taking, which, inter alia, encourage the effective use of land by re-using land that has been previously developed.

It has been established previously by the Secretary of State's appeal decision in respect of WA/2008/0788 that the airfield (and majority of application site) comprises previously developed land (PDL). The Inspector's report considered the position regarding the extent of PDL at Dunsfold Park at paragraphs 355 – 358 of the decision letter. This confirms that there was no dispute that the areas which contained the hangars and other buildings to the north of the site constitute PDL.

There are, however, other buildings and structures, such as fuel storage tanks scattered around the site which all remain and are or have previously been associated with the aviation use. The Inspector's report confirms at paragraph 356 that whilst the rest of the site is open, that does not mean it is undeveloped. The runways, taxi ways and perimeter road are central to the functioning of an aerodrome. These comprise engineering structures, which constitute development.

The Inspector noted that in terms of expanses of grassed areas in between the runways, these are functionally related to them. They provide for the safe run off areas for aircraft and a means of direct access to them for emergency vehicles. These areas continue to be managed to maintain visibility for users

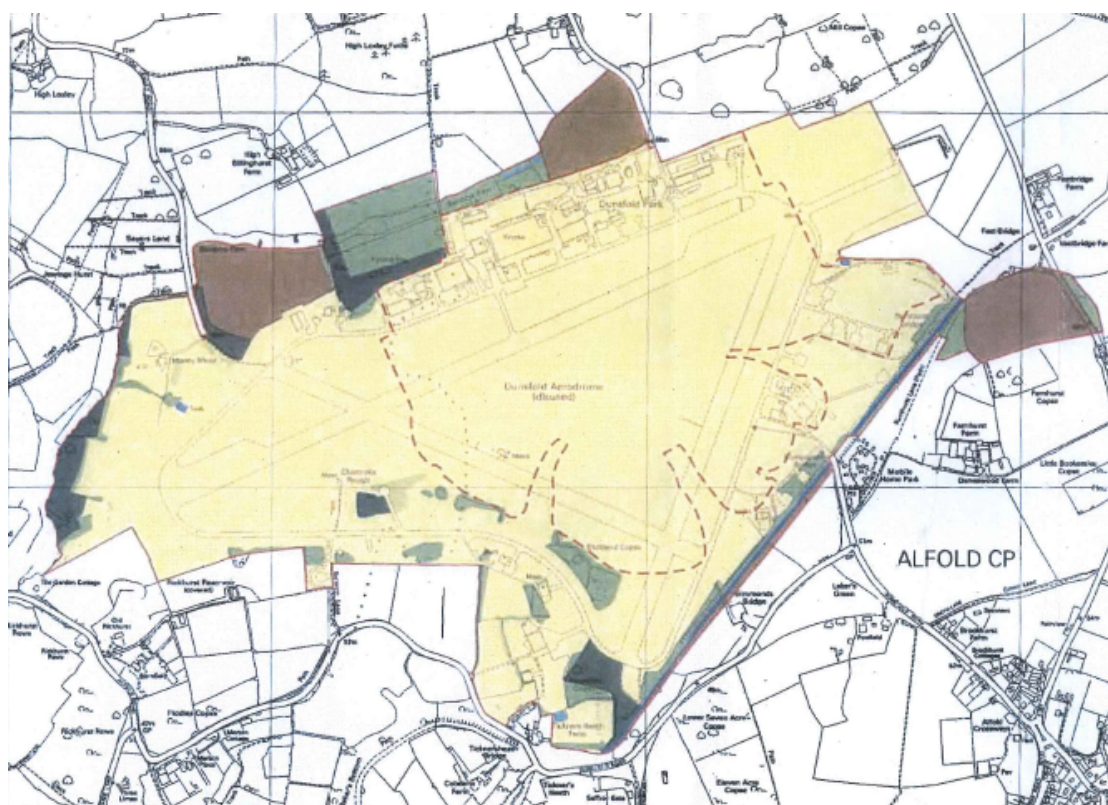
of the airfield. As such, the SoS concluded that these areas are all essential to the established use of the site and comprise PDL.

The NPPF published in 2012 defines PDL as:

“Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.”

The applicants in relation to the current application submit that 86% of the total application site comprises Previously Developed Land. Officers agree with this calculation, which appears to take into account the comments made by both the Secretary of State and the Planning Inspector in determining the 2008 appeal, and also reflects the up to date guidance contained within the NPPG and the definition of PDL within the NPPF.

Plan showing extent of Previously Developed Land – PDL is shown in yellow



The proposed new settlement is indicated as largely taking place within the confines of the existing airfield, with the exception of the indicative access road leading from the A281. This would extend over agricultural land and therefore, the entire development (albeit most of it) would not take place on PDL.

The Joint Parish Councils' letter to the Secretary of State challenges the 86% figure, owing to the discrepancy between this figure and the Council's evidence to the public inquiry in relation to the WA/2008/0788 appeal. At the appeal, the Council's evidence suggested only 22.5% compared with 86%. The Joint Parishes' response states that the Inspector made no conclusion as to the percentage of the site.

Officers note the comments of the Parish Councils' response. However, this response does not give sufficient weight to the Inspector and Secretary of States' conclusions. The Inspector found that the operational aerodrome, including the grassed areas between the runways, the taxi ways and perimeter roads, all constituted Previously Developed Land. This therefore overrides the evidence and case of the Council in relation to that appeal. It is correct that the Inspector did not specify a percentage. Officers agree that the plan submitted by the applicants in relation to the 2009 appeal (upon which the 86% is based) illustrates the visual extent of the Previously Developed



Land, and accords with the Inspector's comments in terms of which areas of the site constitute Previously Developed Land. Officers are satisfied that the majority of development, with the exception of the proposed access, would be positioned on Previously Developed Land.

It is a core principle within the NPPF to encourage the re use of Brownfield land (paragraph 17). The delivery of a substantial level of housing on brownfield land, is a substantial benefit which weighs heavily in favour of the current application.

### Brownfield land Register

The Housing and Planning Act 2016 requires all Councils to publish a Brownfield Register. This register will provide information on brownfield sites that are potentially capable of supporting housing development. Whilst the Act has received Royal Assent, secondary legislation is awaited to introduce this. However, Waverley Borough is one of a number of Councils that has been selected to pilot a Brownfield Register. The register is available to view on the Council's website. Dunsfold Park is not included on this list, as it does not yet have planning permission. However, were permission to be granted it would be included on this list. Importantly, once the Brownfield Register regulations come into force, the site would become a likely candidate for inclusion, even if permission has not been granted.

### Garden Village Expression of Interest

The Government has a strong commitment to deliver Garden Villages as a key way to deliver additional housing need. It is proposed to extend its Garden Cities programme with support for Garden Villages at a scale of 1,500 – 10,000 new homes. The defining characteristics of a garden village are said to include being well sited for transport and access to larger settlement, responsive to the local surroundings, provide a clear centre and strong sense of identity, have a diverse range of community activities and have a thriving local economy based on small business.

Waverley Borough Council has made a "without prejudice" Expression of Interest to the Homes and Communities Agency. This is a material consideration of some limited weight, as if the bid is successful / the potential compliance or capability of the proposal being developed appropriately to meet the identified criteria, is of some relevance. If successful the bid could deliver benefits such as grants, new infrastructure and planning freedoms.

### Compliance with Policy SS7 of the Pre-Submission Draft Local Plan Part 1

Policy SS7 of the Waverley Borough Pre-Submission Local Plan Part 1: Strategic Policies and Sites reads:

“Dunsfold Aerodrome is allocated for mixed use strategic development to accommodate housing, employment and associated supporting uses.

The development should create a high quality, mixed use community with its own identity and character, forming a new settlement, with a range of community facilities and services, appropriate to a settlement of this size.

The development should fully recognise the significance of the heritage value of the site and conserve the site’s heritage assets in a manner appropriate to their significance.

The scheme should include:

- a) Up to 2,600 homes to be delivered by 2032
- b) An expanded business park with around 26,000 sqm of new employment (B Class) floorspace.
- c) A local centre providing –
  - i. At least 3,750 sqm gross floorspace with shops, financial and professional services, restaurants and cafes, drinking establishments and hot food takeaways (use Classes A1 to A5) to provide for the day to day needs of residents, and
  - ii. Social infrastructure including a new primary school, which will additionally provide early education for two to four year olds, health facilities, and community facilities. A financial contribution will also need to be made to off-site secondary school provision.
- d) The provision of publicly accessible local and strategic open space to include a managed Country Park of at least 103 ha.
- e) Appropriate on and off site leisure facilities
- f) A new canal basin to the Wey and Arun Canal
- g) Land to be reserved on or adjoining the site for the provision of a museum reflecting the site’s history as an aviation centre
- h) Public art to reflect the heritage of the site
- i) Necessary highways improvements to adequately mitigate the likely impacts, including cumulative impacts, of the proposed development on both the safe operation and the performance of the surrounding road network
- j) A package of sustainable transport measures, including a bus service to be provided and secured in perpetuity for this site, to maximise opportunities for alternative forms of transport and to support alternatives to the private car
- k) The reinforcement of existing utility infrastructure for electricity, gas, water and telecommunications to serve the development

- l) An appropriate buffer between the permitted anaerobic digestion facility and any new housing development.

The development must protect the setting of the nearby Surrey Hills Area of Outstanding Natural Beauty, in accordance with Policy RE3.

The Council would expect a comprehensive masterplan to be produced to inform the delivery and phasing of the development.”

The weight to be attached to Policy SS7, of the Pre Submission Local Plan, is subject to the degree of unresolved objections to the Policy. There are a number of objections to this policy submitted pursuant to the Local Plan consultation. These primarily relate to transport/traffic concerns, increased pollution, impact on infrastructure and sustainability. The objections raised are directly addressed within this report, and are not accepted by officers. Nonetheless, these are still considered to be unresolved objections at this time, and as such only limited weight should therefore be attached to the Policy. Nonetheless, it remains a material consideration against which the following assessment has been made.

The proposal is for up to 1,800 homes, which is below the 2,600 figure quoted within the Policy. Nonetheless this remains a significant amount of housing, and importantly, given the outline stage and having regard to the indicative master plan, the current proposal would not prevent additional housing being proposed/ provided in the future.

The proposal includes expanding the existing business park with 68,866 sqm, a net increase of 24,137 sqm. This is slightly below the figure set out within Policy SS7, however, this figure was provided as a guideline rather than an absolute requirement. In any event, the proposal would meet the requirement of providing an expanded business park which would provide a significant contribution to employment floor space within the Borough.

The proposal includes a local centre. This includes up to 2,150sqm of Classes A1-5 uses. This is for a lower amount than the figure contained within criterion c)i) of Policy SS7.

The proposal includes social infrastructure including a new primary school, which would additionally provide early education for two to four year olds, health facilities, and community facilities. A financial contribution would also need to be made to off-site secondary school provision at Glebelands School in Cranleigh.

The development proposes open space, which it is indicatively stated will include a Country Park measuring 134 hectares. In addition, it has been

demonstrated that the scheme could accommodate an appropriate level of on site leisure facilities. A new canal basin to the Wey and Arun Canal is proposed. Further detail on the above elements of the scheme would be the subject of further consideration at the reserved matters stage.

The proposal does not include the reservation of any land for the provision of a museum. However, other means of retaining the site's history as aviation centre are indicatively proposed in the form of a 'runway park' and it is noted that there would be scope for the provision of public art within the community centre, as well as within the street scene. There is a pending application submitted at land east of Benbow Lane, on Dunsfold Road, seeking permission for the erection of a building to accommodate a museum reflecting the site's history as an aviation centre under reference WA/2016/1954. This is a standalone application, with different applicants to the current application. Even if permission were granted for that scheme, it could not be guaranteed that this would be brought forward alongside the current proposal (should it too be permitted). Nonetheless, there is potential for this policy requirement to be met off site. In addition, it is noted that there could be space to accommodate a museum within the application site at a later date.

The County Highway Authority has concluded that the proposal would provide for the necessary highway improvements to mitigate the impact of the future development on the surrounding road network, and that a package of sustainable transport measures to maximise opportunities for alternative forms of transport and to support alternatives to the private car are proposed. The proposal would provide appropriate reinforcement of existing utility infrastructure for electricity, gas, water and telecommunications to serve the development.

The indicative layout plan demonstrates that an appropriate buffer could be provided between the permitted anaerobic digestion facility and any new housing development.

In assessing compliance with Policy SS7, there are a number of matters that require consideration of detailed plans as part of a reserved matters application. However, having regard to the indicative details submitted, officers are satisfied that the development is capable of creating a high quality, mixed use community with its own identity and character, forming a new settlement, with a range of community facilities and services, appropriate to a settlement of this size.

#### Environmental Impact Assessment

The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) state that an Environmental Statement (ES) should 'include the data required to identify and assess the main effects which the development is likely to have on the environment'.

An ES is required to ensure that the likely significant effects (both direct and indirect) of a proposed development are fully understood and taken into account before the development is allowed to go ahead. An EIA must describe the likely significant effects and mitigating measures envisaged.

A Regulation 5 Screening Opinion in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (EIA Regs) was adopted by the Council in June 2014. The Screening Opinion concluded that the proposed development scheme falls to be classed as a Schedule 2 Urban Project (paragraph 10b), and would constitute EIA development.

Subsequently, a request for a Scoping Opinion was made by the developer under Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended), reference SO/2015/0008. Matters identified in the Scoping Opinion as needing to be addressed in the Environmental Statement (ES) included:

- Ecology and nature conservation
- Landscape and visual amenity
- Cultural heritage and archaeology
- Land quality and hydrogeology
- Hydrology and water resources
- Access, traffic and transport
- Air quality and odour
- Noise and vibration
- Social and community wellbeing
- Economic issues
- Cumulative impacts

Officers have sought the independent review of the content and scope of the ES by Surrey County Council's in-house Environmental Assessment Team. The advice was that, as submitted, the Environmental Statement was compliant with the minimum information requirements set out in Part II of Schedule 4 of the EIA Regulations 2011 and the Environmental Statement could be considered to be complete.

Following amendments to the application, the applicant submitted additional information which, due to its nature, is considered to constitute a submission of 'further information' under Regulation 22 of the EIA Regulations. This was

confirmed by Surrey County Council's in-house Environmental Assessment Team. This was received by the Council on the 1<sup>st</sup> September 2016.

The relevant planning policies and guidance relating to the ES topics, are set out within the 'Development Plan Policies' section of this report (above).

The main conclusions of the ES topics and the Officers' response to them are set out below:

- Chapter 7: Ecology and Nature Conservation

Ecological reports submitted with the application include a Phase 1 Habitat Survey and a full suite of Protected Species Surveys. Habitats within the application site are diverse and include some species rich examples. In terms of the site's overall biodiversity, the proposal provides a significant opportunity to enhance the site's ecological value. There are 3 internationally designated sites located between 7-10 km from the site. These include the Thursley, Hankley & Frensham Commons Special Protection Area (Wealden Heaths Phase 1). In addition there are 13 national or locally designated sites within a 1 km radius; these include Sites of Nature Conservation Importance (SNCIs) Ancient Semi-Natural Woodland and the Chiddingfold Forest Site of Special Scientific Interest (SSSI).

The Environmental Statement identifies that the potential demolition and construction impacts would be:

- Habitat loss
- Mortality of species associated with clearance and demolition works and construction activities
- Severance such as fragmentation of habitat and movement corridors
- Disturbance associated with works in the vicinity of retained habitats, lighting or noise in the vicinity of shelter for species
- Contamination such as sedimentation, run-off and pollution events/spills

The Environmental Statement concludes that with mitigation the majority of demolition and construction impacts would be reduced to not significant. The mitigation would include implementation of best construction practice including ecological supervision/attendance, the protection of retained habitats, the phased enhancement and creation of habitats; the translocation of habitats and species, and provision of specific replacement habitat and features for shelter. The creation of new waterbodies during this phase is predicted to have a significant positive impact at the local level for Great Crested Newts by providing new breeding opportunities. A residual significant negative impact

would remain at the district level for certain bird species although overall demolition and construction impacts would be reduced to not significant for other bird species. Overtime, the enhancement proposed at Holdhurst Farm, would result in long term positive impacts for birds, including farmland birds.

The potential operation impacts considered include:

- Mortality of protected species
- Disturbance from the urban effects associated with increased recreational pressures, traffic, lighting and potential introduction of invasive species

The majority of operational impacts would be reduced to be not significant. This would be due to mitigation measures that would include management and maturation of the habitats within the Country Park in accordance with the ecology strategy and via the Landscape and Habitat Management Plan (LHMP). For bird species, with the continued management of Holdhurst Farm to benefit farmland birds, it is predicted that overall the impact on birds will balance out and in the long-term would result in a significant positive impact at the local level. No significant impact is predicted for badgers and reptiles. The management and delivery of the landscape design proposals would result in the diversification of habitats on the site resulting in a significant positive impact on habitats in the long term. A significant positive impact would be delivered at the Local Level for Great Crested Newts.

The Surrey County Council's in-house Environmental Assessment Team has confirmed that the information set out in the ES and its supporting appendices, in combination with any additional information or evidence forthcoming from the consultation on the planning application, is sufficient for the application to be determined, with reference to the question of impacts on Ecology and Nature Conservation.

Natural England has reviewed the submitted Environmental Statement and accompanying reports and has raised no objection, subject to appropriate conditions in respect of Green Infrastructure and impacts on Nationally Designated Sites. The recommended conditions would be to secure the submission and approval of an Ecological Management Plan, provision of onsite greenspace and habitats at the site and to ensure that the proposed Country Park be linked to the residential development in perpetuity.

Surrey Wildlife Trust (SWT) has also provided comment on the proposals. SWT has advised that the Environmental Statement provides appropriate information for the Local Authority to assess the ecological impacts of the proposal. No objection is raised subject to conditions and mitigation. These are similar in content to those recommended by Natural England, but also

include providing replacement native tree and hedgerow planting to exceed any such habitat removed.

Having regard to the advice of Natural England, and Surrey Wildlife Trust, officers are satisfied that the Environmental Survey and accompanying reports are sufficient to identify the likely impacts of the development in respect of Ecology and Nature Conservation. Where there are identified impacts on habitats or protected species, these could be appropriately mitigated. There would also be longer term enhancements in respect of the site's ecology. Where mitigation is required this would be secured by way of condition(s) on any permission granted.

There would be a significant negative impact on breeding birds by way of direct habitat loss. However, officers are satisfied that, having regard to the submitted reports and the views of consultees, that the likely effects upon ecology and habitats have been satisfactorily addressed subject to mitigation, and, in respect of the majority of impacts, there would not be a significant adverse effect overall, in EIA terms.

- Chapter 8: Landscape and Visual Amenity

A small part of the site lies within, and the site boundary adjoins, an Area of Great Landscape Value (AGLV). The Landscape and Visual Impact Assessment (LVIA) considers the impact that the development would have upon the landscape and the people who view that landscape. The Environmental Statement (ES) has considered the visual and landscape effects of the construction and operational phases of the development.

Landscape effects:

The ES considers 3 Landscape Character Areas (LCAs) as defined within the 'Dunsfold Park in its Landscape Setting' prepared by the Land Use Consultants dated 2006 and 1 national landscape designation and 1 local landscape designation. These are:

A1 – Alfold Crossways way and Arun Clay Vale

B1 – Dunsfold Undulating Clay Weald

C1 – Loxhill Clay Slopes

Surrey Hills AONB

Surrey Hills AGLV

In respect of Local Character Area (LCA) A1, the construction phase of development would have direct effects as a result of removal of trees and hedgerow alongside the A281 and loss of dense tree cover either side of the Wey and Arun Canal. The operation phase of development would increase



the amount of built development and lighting in the landscape. This would particularly affect this character area over the long term.

In respect of Local Character Area B1, whilst there would be limited construction within this area, there would be views of other construction works, mostly of higher elements such as cranes. The operational phase would have a limited amount of development in this area. Built form would however be visible from some parts of this LCA. This would have a minor effect on this LCA long term.

In respect of Local Character Area C1, the construction works would be located in a small part of this area, and effects on character would be localised so as not to affect the LCA as a whole. Furthermore, since this section of the site that is within the LCA is already developed as a business park, construction works would not appear completely uncharacteristic. This LCA already contains a level of built development including large scale industrial units in the Dunsfold Aerodrome. There would be some new development on the edge of this LCA. This would have a minor effect on this character area in the long term.

In respect of the AONB, there would be no construction works in this area; however, some construction works would be visible from certain areas. The construction impacts would be partially reversible, in that construction equipment/activity would be removed at the end of the construction phase. Although the development would be visible from some parts of the AONB as part of the operational phase, it would form part of a wider landscape context which already includes built development. Whilst traffic will increase, this is considered to be relatively minor, and the road is relatively well contained by trees.

In respect of the AGLV, it is anticipated based on the indicative layout that there would be no substantial built form in this area, but there would be ecological mitigation works, construction of pathways and landscape works, this would be visible in some views. The extent of the visibility of these works, from the AGLV would be limited at the operational phase. The impact is therefore considered to be minor, reducing to negligible as mitigation planting matures.

In respect of all of these character areas, no mitigation is proposed for the construction phase, as the impacts would be for a temporary period and would cease at the end of the construction phase.

In respect of all these character areas, the mitigation for the operation phase of development has been incorporated into the indicative design and involves

restricted building heights, high quality design and architecture, the retention of existing planting on site, open space and recreation areas and woodland planting proposals, all of which would serve to blend the development into its rural context.

Visual effects:

The ES identifies 20 visual receptors, and considers 10 of these to be affected by significant visual effects. Within the addendum Environmental Statement, in addition to the viewpoints selected within the main ES, consideration is given to the potential for views from the following locations:

- Longer distance views from Winterfold Hill and Pitch Hill
- View from Greensand Way at Burgate Hanger
- Public footpath 277 running northwest from Painshill Farm
- View from Public Footpath up the escarpment to the Raswell
- Additional views from Hascombe Hill

It was considered within the ES, that following observations from the above locations, these did not suggest the need for any additional viewpoints to be included – primarily this was due to intervening landscape features blocking views of the site.

These receptors and the visual impacts of the construction and operational phases of development are:

1. Employees in Dunsfold Business Park and users of the Aerodrome
  - Current views are of expansive open site and features such as sheds and runways. During construction phase, the receptors would view construction of the proposed units within the business park, the construction of the educational hub and schools and the runway park
  - The effect of the construction upon these receptors would be moderate/minor negative and reversible because construction activities will cease at the end of the construction phase
  - Operational effects will vary for receptors from negligible for those who do not have views, to large scale of effect where the new built form would be located at close quarters. Negative effects will arise from the blocking of some existing views, whilst positive effects would result from enhanced condition and quality of the environment of the business park
2. Users of the Wey South Path between Cobdens Farm and the outskirts of Cranleigh

- Views from this section are typically enclosed by trees and woodland with intermittent short distance glimpses across surrounding agricultural fields
  - The construction of the new bridge and canal would be visible at close quarters when walking the path and would involve the removal of some of the dense tree cover. However, the construction works within the main site would be mostly blocked from view by vegetation bounding the canal
  - The effect of the construction upon these receptors would be moderate negative and reversible because construction activities will cease at the end of the construction phase
  - With regard to the operational phase, due to the loss of trees and introduction of new access road and bridge over the public right of way, the visual effects would be large for a short section of this path.
  - Although these changes are likely to be perceived as negative, the improved footpath, condition of the canal, and new amenities associated with the canal would be positive
3. Users of footpath from Barnfield to the south of the site
- Views to the north are obstructed by vegetation, but the elevated nature of the footpath allows some views into the site where large scale units within the business park and the runway are visible, but filtered by site boundary vegetation
  - The construction of two dwellings, adjacent to Benbow Lane would have the greatest effect upon views from the footpath. Where construction activity is visible, the scale of the effect of works on views from this footpath would vary between small and medium.
  - The effect of the construction upon these receptors would be minor negative and reversible because construction activities will cease at the end of the construction phase
  - With regard to the operational phase, new built form would be visible although this would be softened as vegetation and trees onsite mature
  - A combination of negative and positive effects are likely to occur during the operational phase on the receptors of this landscape
4. Users of Footpath 401 between the A281 and the mobile home park at Compass Bridge
- Long distance views to the north are limited by Farnhurst Copse to the north. The field in which the access road will be located is visible for a short section of the path to the east, where Farnhurst Copse does not block views. The construction works

within the main site would most be blocked by intervening vegetation though there may be intermittent views of the cranes

- The scale of the construction effect would be small as the works would only be seen from a relatively short section of the path.
- The duration of the visibility of the construction work would be minor negative, however, the visual impact would be short term and reversible because construction activities will cease at the end of the construction phase
- In terms of the operational phase, both options for the new roundabout and access road would be visible between vegetation. The presence of new infrastructure would result in a small change in views from this path, decreasing to imperceptible as planting matures.

5. Visitors to Hascombe Hill in the Surrey Hills AONB to the north west of the site

- Open views from Hascombe Hill are limited to a few points due to the wooded nature of the hill. As this is an elevated location, there would be views of construction works throughout all phases of the development
- There would be a small to medium change to the view affecting a very limited number of high susceptibility locations
- The effect of the construction upon these receptors would be moderate/minor negative and reversible because construction activities will cease at the end of the construction phase
- The operational phase visual effects would vary depending on location. The new development would be perceptible from viewpoint 16 (public footpath to east side of earthwork on Hascombe Hill). However, the new village would form a relatively small part of the overall panoramic view. The development would be less visible from other viewpoints due to vegetation screening.
- The visual impacts of the operational phase would reduce as the proposed trees and planting matures

6. Visitors to Winterfold Hill and Pitch Hill in the Surrey Hills AONB to the north east of the site

- Due to the elevated nature of nature of the AONB in this location views are wide and extensive including views of the South Downs. However, views of the application site are only occasionally available due to tree cover.
- There would be intermittent views of cranes used within all construction phases.
- The overall effect of the construction phase would be minor negative due to the low magnitude of change and limited

opportunities to view. This effect would be reversible because construction activities will cease at the end of the construction phase.

- In respect of the operational phase, the development would appear as a group of low-rise buildings and would form a relatively small part of a wide view in which existing development is present, within a well wooded landscape.

7. Motorists on the A281, passing to the east of the site

- The views from the road are primarily of agricultural fields. The stretch of road between Barrihurst to Alfold Crossways is bound by hedgerows that obscure views of the aerodrome, except for where field gates allow views through.
- In terms of the construction phase, works on site are unlikely to be particularly noticeable to passing motorists due to the roadside hedge and direction of travel. However, the construction of the access road and roundabout will clearly be visible at close proximity.
- The construction phase would result in a moderate/minor-negative visual effect, and would be reversible because construction activities will cease at the end of the construction phase.
- In terms of the operational phase, the roundabout and road would reduce the rural character, although materials and vegetation will help with its integration. The new built development is unlikely to be visible from the road except from glimpsed views through hedgerow gaps.
- The overall level of effect of the operational phase on the receptor group would be moderate negative in year 0 reducing to moderate-minor, a combination of positive and negative. The positive effects would become apparent as planting matures.

8. Motorists on the B2133 between Alfold and Dunsfold around the south of the site

- Motorists typically have their eyes on the direction of travel. Views from the road into the site are limited by intervening vegetation.
- In terms of the construction phase, works would mostly be blocked by intervening vegetation, though construction of the very low density residential development would be seen above trees as the road users pass Tickners Heath.
- The overall effect of the construction phase on motorists is considered to be minor negative due to the short section of road affected for a temporary period. This would be reversible

because construction activities will cease at the end of the construction phase.

- The overall level of effect from the operational phase is considered to be moderate-minor negative. As planting on the southern boundary matures, views of the development would be filtered and would become minor-negative.

9. Local community at Stovolds Hill directly to the north of the site

- The community is in an elevated position to the north of the application site, and has views that extend southwards to the northern boundary of the site. These include views of the existing business park and aircraft movements.
- In terms of the construction phase, the scale of change will vary from imperceptible to small where aspects are likely to be visible. There may be some clearer views from individual properties but these are not publicly accessible. The work would be contained behind the newly installed bund and planting.
- Overall, the construction effects on the community would be minor negative, but would be reversible because construction activities will cease at the end of the construction phase.
- The operational effect would be minor negative. The effect would reduce over time as planting on the northern boundary matures, but this would not be sufficient to reduce the effect to negligible.

10. Mobile Home Park at Compasses Bridge

- From within the receptor, views are partially obstructed by other mobile homes and site boundary vegetation. Any views would be of the construction activities associated with residential areas to the east of the development.
- Although the site is adjacent to the mobile home park, the vegetation on the site boundary would partially screen views so that residents do not have clear views of construction activities.
- The effect of the construction phase would be moderate-minor negative due to the screening effect of vegetation. In addition, the effect would be reversible because construction activities would cease at the end of the construction phase.
- In terms of the operational phase, views into the site would be seen against a baseline of existing fencing and buildings associated with Dunsfold Park and therefore the change is unlikely to be viewed as negative compared to the existing situation.
- The overall effect of the operational phase of development would be moderate neutral reducing to minor neutral after vegetation matures.

Mitigation (relevant to all receptor groups):

The key mitigation measures which include large buffers of open space, provision of recreation areas and new planting and vegetation, particularly along the site boundaries are designed into the scheme. These would be finalised and secured at the reserved matters stage. Existing mitigation comprises extensive boundary planting and a bund along the northern boundary of the site.

The Surrey County Council's in-house Environmental Assessment Team has confirmed that the information set out in the ES and its supporting appendices, in combination with any additional information or evidence forthcoming from the consultation on the planning application, is sufficient for the application to be determined, with reference to the question of impacts on the landscape and visual amenity.

In the original response from Natural England, objection was raised in respect of the methodology used within the LVIA. However, Natural England has subsequently advised that it has no fundamental objection in respect of the AONB. Natural England has advised that the methodology used for the LVIA is acceptable. Natural England has also advised that further mitigation measures are required, and if it is confirmed that mitigation can be provided, their objection would be removed. In addition, no comments have been received from the CAA with regard to the loss of the airfield.

In summary, having regard to the views of consultees and the submitted reports, it is clear that there would be significant visual landscape impacts during the construction period. However, owing to the temporary nature of these impacts no overriding concern is raised. Initially, there would be significant impacts on some views resulting from the operational phase. However, officers are satisfied that the impacts could be appropriately mitigated through landscaping, planting and retention in perpetuity of the Country Park. As the landscaping and planting matures, the likely impacts would reduce to not significant and would include some positive impacts.

- Chapter 9: Cultural Heritage and Archaeology

The site contains a number of unlisted historic features including within the airfield itself. There are no listed buildings on site. There are no Grade I or Grade II\* listed buildings within a 5 km radius. However, there are 40 Grade II listed buildings within the same radius. The Wey and Arun Canal is a landscape feature of historic importance. The site has potential to contain significant archaeological deposits.

The construction phase has the potential to impact on below ground archaeology and the loss of historical features on the site. Proposed mitigation includes undertaking an archaeological evaluation, in conjunction with Surrey County Council Archaeological Service, prior to development, in order to inform a full programme of mitigation at the reserved matters stage. The loss of the historic features would be mitigated by a programme of detailed recording and analysis of the features prior to loss. The canal would be retained and enhanced by the development and the construction activities should only have limited impact on this feature and could be mitigated through a programme of sensitive screening works during the construction of the new A281 access road.

The operational phase would not have any impact on below ground archaeology. Retained historic structures may potentially be vulnerable to decay. However, this impact is not of a significant level and would not require mitigation. The setting of the canal is likely to be permanently affected by the proposed access and new bridge over the canal. However, these impacts would be mitigated in part through landscape design.

The Surrey County Council's in-house Environmental Assessment Team has confirmed that the information set out in the ES and its supporting appendices, in combination with any additional information or evidence forthcoming from the consultation on the planning application, is sufficient for the application to be determined, with reference to the question of impacts on the cultural heritage and archaeological interest of the site and the surrounding area.

The Council's Historic Buildings Officer has recommended the listing of Primemeads Cottage which is to be retained as part of the development. Should the status of this building change, its significance upon the development of the site would be assessed at that time, during the reserved matters stage if outline permission is granted. Subject to securing an appropriate layout and detail at the reserved matters stage, no objection is raised by the Council's Historic Buildings Officer on this matter.

The County Archaeologist has advised that information has been submitted such as to demonstrate that the most important element of the site would be retained, and a full record made of buildings that are to be removed. That officer therefore raises no objection subject to an appropriate condition/requirement for a scaled field evaluation and updated statement of heritage significance to be submitted and addressed as part of any reserved matters application.



Some positive significant impacts would result from the re-location of historic Special Steel Test Pads and their incorporation into the overall design master plan.

Having regard to the views of relevant consultees, officers concur with the conclusions of the Environmental Statement, namely that the proposal would not give rise to any residual significant impacts in respect of Cultural Heritage and Archaeology.

- Chapter 10: Land Quality and Hydrogeology

Minor negative residual impacts would result from the construction process including the small loss of agricultural land, detrimental impacts on nearby watercourses following silt laden run off, potential spillage and leaks from hazardous substances. Mitigation details would be finalised following a full site survey but would include a Construction Ecological Management Plan, implementing industry best practice guidance.

The operational phase would result in a number of negligible/minor negative impacts. These would include increases in contaminative uses on site, increases in the impermeable cover across the site and its resultant impacts, and re profiling of the site impacting on the catchment/altering flow input in relation to the Wey and/ or Arun. Mitigation measures include the use of Sustainable Urban Drainage systems (see later section of report on this), adoption of good environmental management practices and a full remediation scheme to be finalised at the reserved matters stage (see Contaminated Land section of this report) and the provision of a new waste water treatment works.

The Surrey County Council's in-house Environmental Assessment Team has confirmed that the information set out in the ES and its supporting appendices, in combination with any additional information or evidence forthcoming from the consultation on the planning application, is sufficient for the application to be determined, with reference to the question of impacts on the air quality and odour from the application site to the surrounding area.

As set out within the Contaminated Land and Utilities section of this report, officers, taking into account the view of the Council's Pollution Control Officer, are satisfied that where there is contamination on site, this could be appropriately mitigated with conditions without any harmful significant residual impacts.

- Chapter 11: Hydrology and Water Resources

This section of the Environmental Statement considers the impacts in terms of flood risk from fluvial, surface water, groundwater sewers and canals. It also considers runoff impacts including in terms of the quantity of discharge. Impacts specific to the construction process including temporary works and their impact on hydrology and water resources. Information on these topics is contained within the Flood Risk Assessment (FRA) and the Drainage Strategy.

Dunsfold is located within an area of water stress. Owing to the site's former use as an aerodrome, there may be implications in terms of water quality. It is noted that the existing sewer network cannot accommodate the proposed development without improvements. The site is located primarily within Flood Zone 1, with a small section of the site in the south east located within Flood Zones 2 and 3.

The Statement highlights that the main potential impacts from the demolition and construction phase would be temporary increases in the risk of fluvial flooding and increases in demand for potable water and increased foul site flows. Flood risk mitigation measures are contained within Chapter 5 of the Appended FRA.

In respect of the operational phase, the Environmental Statement identifies potential impacts would relate to pluvial surface water, fluvial water flows, water supply and foul water. These specifically would include potable water demand, increased foul site flows, increased volumes of runoff due to new site drainage network and alterations to fluvial water flows.

The mitigation of the drainage impacts at both construction and operational phases include the construction of the new foul sewage treatment works and the construction of a new sustainable surface water drainage system. Mitigation of water supply impacts includes the phased reinforcement of the main pipeline from Ashlands Service Reservoir to the site boundary at Honey Mead. Following mitigation, there would be no significant residual impacts either from the construction/demolition or operational phases.

Surrey County Council's in-house Environmental Assessment Team has confirmed that the information set out in the ES and its supporting appendices, in combination with any additional information or evidence forthcoming from the consultation on the planning application, are sufficient for the application to be determined, with reference to the question of impacts on hydrology and water resources.

The Lead Local Flood Authority has found the proposal acceptable subject to appropriate conditions and management of the SuDS scheme to be controlled

by way of legal agreement. A further update will be provided with respect the Environment Agency's final comments. However, it is not envisaged that any substantive objection will remain.

Officers concur with the findings of the ES and consider that the proposals, subject to mitigation measures, would not have a significant effect on hydrology and water resources subject to the imposition of suitable conditions.

- Chapter 12: Access, Traffic and Transport

This section of the report considers the impacts from the construction and operation phases of the proposed development. The issues covered include changes in the volume of traffic and impact on the local road network, changes in demand for public transport services, changes in demand for walking and cycling facilities, severance effects, delays to pedestrians, impacts on pedestrian amenity and changes in the incidence or severity of accidents on the highway network.

In respect of the above impacts, the Environmental Survey considers the impact on 27 different junctions – the majority of these are along the A281, B2130 Dunsfold/Godalming/Brighton Roads and the A3100.

The Construction Impacts would include impacts on road users from construction traffic, and impact on pedestrians and cyclists from construction traffic. Mitigation for the construction process would involve implementation of a Construction Transport Management Plan. The construction impacts would be long term but temporary. The construction impacts, with mitigation, would be minor negative.

The operational impacts would comprise severance, driver delay, pedestrian delay, pedestrian amenity and accidents and safety. Pedestrian delay, would involve delays to those crossing roads as a result of increased traffic flows. This is found to only become an issue at particular peak times. The mitigation for these impacts would comprise implementation of a travel plan, bus strategy and off site highway improvement works. Following mitigation, the impacts in terms of pedestrian amenity, and accidents and safety are considered to be negligible. The ES concludes that vehicle delay is expected to reduce significantly along the modelled A281 corridor as a result of the offsite highway works. The remaining impacts would be minor negative.

Surrey County Council's in-house Environmental Assessment Team has confirmed that the information set out in the ES and its supporting appendices, in combination with any additional information or evidence forthcoming from the consultation on the planning application, are sufficient for

the application to be determined, with reference to the question of access, traffic and transport impacts.

The County Highway Authority has advised that, subject to highway infrastructure improvements, the proposal would not have a severe impact on the highway network.

Officers therefore agree with the scope and findings of the Access, Traffic and Transport assessments undertaken, and consider that these provide a robust and realistic assessment of the likely impact of development generated traffic on the highway network. In conclusion, officers are satisfied that, with appropriate mitigation primarily in the form of off site highway improvements, there would not be a significant residual impact.

- Chapter 13: Air Quality and Odour

The site is not within a designated AQMA. Notwithstanding this, given the scale of the proposed development it has the potential to impact on designated AQMAs in both Bramley and Godalming. In addition, air quality as a measure of environmental impact is a relevant consideration to the proposal generally. Therefore air quality remains an important material consideration

For the construction phase, the key pollutant is considered to be dust, which could potentially cause temporary effects.

The construction phase involves the demolition of existing buildings and the runway, which would give rise to the potential for dust emissions as would any necessary earthworks. Furthermore there is a large risk of dust resulting from the construction traffic. Mitigation would include the development and implementation of a Dust Management Plan, measures for good site maintenance such as locating dust resulting activities away from receptors and providing dust barriers and good communication with relevant parties.

The construction phase would also give rise to potential impacts of exhaust emissions from construction traffic and HDVs. Proposed mitigation would include implementing a travel plan, production and implementation of Construction Logistics Plan to manage the sustainable delivery of materials and goods, and good practice measures including no idling vehicles.

Other mitigation measures for the construction phase would include avoiding the burning of waste materials on site, using suitable dust suppression techniques on all equipment and avoiding explosive blasting to ensure good storage of materials.

The operational phase has the potential to create emissions from road transport that could impact on future residents and users of the site. However, results of modelling have demonstrated that no significant likely effects are likely to occur and therefore no mitigation is required.

The proposed Waste Water Treatment Plant (WTTP) has the potential to give rise to odour impacts. Mitigation measures are suggested to include full detail of the WTTP at the reserved matters stage, and preparation and implementation of an appropriate Odour Management Plan.

Surrey County Council's in-house Environmental Assessment Team has confirmed that the information set out in the ES and its supporting appendices, in combination with any additional information or evidence forthcoming from the consultation on the planning application, are sufficient for the application to be determined, with reference to the question of impacts on the air quality and odour from the application site to the surrounding area.

The Council's Air Quality Officer has raised no objection to the proposal, subject to mitigation methods in the form of a Site Management Plan, a condition to prohibit burning of materials, installation of Electric Vehicle Charging Points (EVPs) and a process for monitoring and appropriate mitigation of air quality in surrounding villages.

Officers concur with the findings of the ES and consider that the proposals, subject to mitigation measures, would not have a significant effect on air quality or odour, subject to the imposition of suitable conditions.

- Chapter 14: Noise and vibration

Potential construction noise and vibration sources associated with the proposed development are noise and vibration from construction itself, and construction traffic. Mitigation measures include Construction Environmental Management Plan which would define limits and control methods for construction noise and vibration, the key focus would be the management of working hours, setting noise and vibration limits, ensuring maintenance of plant and machinery, and public liaison.

Potential construction noise and vibration sources associated with the operational phase would be traffic noise arising from traffic flow, noise from users of the educational facility, and operation of fixed plants within commercial and industrial units. Mitigation involves the incorporation of thermal glazing for residential and commercial buildings and ensuring new plant items to comply with limit noise criteria. Assessment has shown that the

traffic movements would not be significant and therefore no mitigation is required.

Surrey County Council's in-house Environmental Assessment Team has confirmed that the information set out in the ES and its supporting appendices, in combination with any additional information or evidence forthcoming from the consultation on the planning application, is sufficient for the application to be determined, with reference to the question of impacts of noise and vibration on the surrounding area.

The Council's Environmental Health Officer raises no objection having regard both to the impacts on residents near the site as well as those who will inhabit the early stages of the development as it proceeds. This is subject to securing a Construction Environmental Management Plan (CEMP) and appropriate conditions at the reserved matters stage.

Officers therefore concur with the findings of the ES and consider that the proposals, subject to mitigation measures to be secured by condition at the reserved matters stage, would not have significant effects by way of noise and vibration.

- Chapter 15: Social and Community Wellbeing

The Environmental Statement considers the potential impacts of the development on the social and community wellbeing of the area and on the future residents of the proposed development. It also considers potential impacts on public rights of way.

The construction period, in particular in relation to the construction of the new access road, would impact upon PRoW, BW400 and the Wey-South Path. At certain points diversions would be required for safety. The proposal would have temporary minor negative impacts on users of the PRoW, having regard to proposed mitigation which would include the use of temporary traffic lights, suitable fencing and diversions. Off site, impacts would include the loss of a small area of the Shalford Common Land in the vicinity of the A281/Kings Road junction, this would result in a permanent minor negative impact. At the A281/Barrihurst Lane junction, users (Horse riders and cyclists) would likely encounter protective fencing for a short period during construction; however, A281 access would be maintained. This impact is considered to be of minor negative significance.

Operational impacts in respect of healthcare, open space, the Wey & Arun Canal and primary education would be minor/moderate positive. Long term moderate positive impacts would result for users of the Public Right of Way.

This is due to improved linkages around the site. In terms of secondary provision, in the absence of mitigation, Glebelands School in Cranleigh would be oversubscribed. Mitigation proposed involves a financial contribution towards expansion/improvements at Glebelands School. Subject to this contribution, the residual impact would be negligible. The proposal would make a significant contribution to housing in the Borough which when measured against the level of need would have a major positive significant impact.

Surrey County Council's in-house Environmental Assessment Team has confirmed that the information set out in the ES and its supporting appendices, in combination with any additional information or evidence forthcoming from the consultation on the planning application, is sufficient for the application to be determined, with reference to the question of the social and community well-being impacts of the development on the study area and the Borough as a whole.

Officers, having regard to the views of relevant infrastructure providers, and concur with the findings of the ES and consider that the proposals, subject to mitigation measures to be secured by condition at the reserved matters stage, would not have significant negative effects on Social and Community Wellbeing, indeed the proposal would result in some positive impacts..

- Chapter 16: Economic Issues

The proposal would generate additional employment, which has the potential to impact on the area by way of the impact of construction on employment, direct and indirect impacts resulting from the Gross Value Added (GVA) by the workforce and indirect impacts resulting from the New Homes Bonus, resident expenditure and council tax receipts. The baseline economy in the study area (4 mile radius of the site) and the Borough is considered to be of a high sensitivity. Although indicators show a high level of employment, they also highlight matters for concern, namely:

- Low economic activity as a result of an ageing population
- High proportions of the population commuting long distances
- High dependency on private car travel
- High levels of net-out commuting resulting in lost GVA per resident, and business rate income to the Local Authority
- Relatively low wages within the Borough compared to those willing to commute

The area has very low levels of deprivation, the only identified areas of deprivation relate to housing and services. This is not unusual for rural areas

where housing is less available and social infrastructure is more sparsely distributed.

Current statistics indicate an imbalance between housing and employment, which if not addressed would see commuting increasing and the business rate income declining relative to the size of the population.

The proposed development would generate 4,612 construction sector jobs over the build period, of which around 20% would be off site. Within a 4 mile radius it is anticipated that the additional jobs would equate to an increase of 3%. This would not be a substantial change but would nonetheless be noticeable, and would amount to a moderate-minor positive significance. For the Borough, however, the impact would likely be negligible. Given that the potential impacts are expected to be positive, no mitigation is proposed.

The development is expected to generate 1,189 jobs which could be expected to increase GVA by approximately £6.8m, an increase of 2.3%. The development would generate additional residential expenditure, which would also include Council Tax. Additional revenue would be generated for the Borough through business rates from additional business floorspace and the development is expected to generate income from New Homes Bonus which would more than double in comparison with the past four years. The operation phase is therefore considered to have positive major-moderate significance on both the study area and on the Borough as a whole. As the potential impacts are considered to be positive, no mitigation is identified as necessary.

Surrey County Council's in-house Environmental Assessment Team has confirmed that the information set out in the ES and its supporting appendices, in combination with any additional information or evidence forthcoming from the consultation on the planning application, is sufficient for the application to be determined, with reference to the question of the economic impacts of the development on the study area and the Borough as a whole.

The Local Economic Partnership has expressed support for the proposal. Of some relevance is the report prepared by the Council's Retail Impact consultants. This is specific to the impact of the retail floor space and therefore is only of limited relevance to the consideration of the overall economic impact. Nonetheless, that report concludes that the proposed local centre is not of a sufficient scale so as to adversely affect the vitality or viability of retail shops/local centres nearby, including within the nearby villages of Cranleigh, Dunsfold and Alfold.



Officers therefore concur with the findings of the ES and consider that the proposals would result in significant positive (major-moderate) economic impacts during the operational stage. Subject to conditions, to carefully control the balance of retail and commercial uses within the proposed settlement, the proposal would not result in any a significant adverse effect in respect of Economic Issues.

- Chapter 17: Cumulative Impacts

The cumulative indirect and direct effects of the current application with those of neighbouring past, present, and reasonably foreseeable developments (at the time of the submission of current application) requires assessment.

The Environmental Statement considers the following developments in order to assess the potential cumulative effects:

- WA/2015/1381 – Land at Springbok Estates, Alfold (refused)
- WA/2012/0555 – New Acres Caravan Park, Stovolds Hill
- WA/2014/2413 – Land West of Sweeters Copse, Alfold
- WA/2010/1489 – Wildwood Golf and Country Club, Alford
- WA/2014/0912 – Land South of High Street between Alfold Road and Knowle Lane
- WA/2014/1754 - Land at 106 and Chantreys Bungalow, Horsham Road
- WA/2015/1569 – Land at West Cranleigh Nurseries and North of Knowle Park (refused)
- WA/2012/0810 – Former Swallow Tiles Site (residential)
- WA/2014/1937 – Hurtwood Polo Club (refused)
- WA/2013/1926 – Milford Hospital, Tuesley Lane
- WA/2014/1244 – Land at Franklyn Road, Godalming (refused)
- WA/2014/1330 – Land at Furze Lane, Godalming
- WA/2012/1078 – Wurth House and Anvil Park, Catteshall Lane
- Wey and Arun Canal restoration

Officers consider that the schemes identified within the Environmental Statement could be reasonable foreseeable as coming forward. Officers consider that only schemes with planning permission should be taken into account at this stage whereas a number of the identified schemes have since been refused or are still pending decisions. This approach would be consistent with that taken on other applications such as at Land South of High Street in Cranleigh (WA/2014/0912). The Environmental Statement therefore presents a 'worse case' scenario.

The report identifies that the only significant cumulative impacts would be minor/moderate positive. These impacts would include a contribution to

meeting housing need, aiding employee retention and safeguarding services, employment opportunities and workforce spend in the local area and the provision of new services and facilities available to existing community.

Each chapter in the ES has considered the cumulative effects and has considered the resulting residual impacts to, in the majority of cases, not to be significant or to be beneficial. In respect of Ecology and Nature Conservation, there would be significant negative impacts at district level, on breeding birds as a result of direct habitat loss. In respect of landscape and visual amenity, there would be moderate negative landscape and visual effects from the demolition and construction phase.

In respect of Cultural Heritage and Archaeology there would be minor negative impacts by way of the loss of surviving runways and general historic pattern of airfield, impact on setting of the Canal between Three Compasses and Fast Bridge and the impact on the setting of the historic but unlisted Farnhurst Bridge.

In respect of Land Quality and Hydrogeology, there would be minor negative impacts resulting from construction works, soil exposure, and potential impacts on water courses and health and safety, and increased sewage volumes than currently generated.

In respect of noise and vibration, there would be minor noise impacts resulting from the construction process. In respect of access and traffic there would be minor negative impacts in respect of driver delays.

Surrey County Council's in-house Environmental Assessment Team has confirmed that the information set out in the ES and its supporting appendices, in combination with any additional information or evidence forthcoming from the consultation on the planning application, are sufficient for the application to be determined, with reference to the question of the cumulative impacts of the development on the study area and the Borough as a whole.

It is considered that the ES has adequately explained the environmental implications of the proposed development and the proposed mitigation measures are acceptable.

Officers are therefore satisfied that the likely cumulative effects of the various developments have been satisfactorily addressed and that there would not be a significant adverse effect overall, in EIA terms.

- Overall conclusions

It is considered that taking into account required mitigation, to be secured by planning conditions/legal agreements, the proposal would not have any significant environmental effects and would comply with the NPPF and the relevant policies of the development plan in respect of Environmental Impact.

### Location of development

The location of development is key to the sustainability of a site. This considers the proximity of the site to key services, which have a key impact on a site's sustainability. It is recognised that the NPPF definition of sustainable development (paragraph 7) goes beyond the location of development and also incorporates economic, social and environmental considerations. This section primarily considers the location of the application site, whereas the remaining elements of sustainable development are considered elsewhere within this report.

Paragraph 52 of the NPPF sets out that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.

Paragraph 55 of the NPPF 2012 states that:

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as:

- the essential need for a rural worker to live permanently at or near their place of work in the countryside; or
- where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or
- where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting; or
- the exceptional quality or innovative nature of the design of the dwelling.

Such a design should:

- be truly outstanding or innovative, helping to raise standards of design more generally in rural areas;
- reflect the highest standards in architecture;

- significantly enhance its immediate setting; and be sensitive to the defining characteristics of the local area.

Paragraph 69 of the NPPF 2012 states, inter alia, that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. It continues that local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see.

Paragraph 70 of the NPPF 2012 states that to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and
- ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Policy C2 of the Waverley Borough Local Plan 2002 states that building in the Countryside beyond the Green Belt, away from existing settlements, will be strictly controlled. Policy RE1 of the Pre-submission Local Plan Part 1 states that the intrinsic beauty of the countryside will be recognised and safeguarded in accordance with the NPPF.

The Key Note Policy of the Adopted Waverley Borough Local Plan aims, amongst other matters, to make provision for development, infrastructure and services which meet the needs of the local community in a way which minimises impacts on the environment.

The text states that opportunities for development will be focused on the four main settlements (Farnham, Godalming, Haslemere and Cranleigh), mainly through the re-use or redevelopment of existing sites.

Policy SP2 of the Pre-submission Local Plan Part 1 refers to the Council's Spatial Strategy to 2032 and the need to maintain Waverley's character whilst

ensuring development needs are met in a sustainable manner. Policy SP2 sets out the following:

- Major development on land of the highest amenity value will be avoided
- Development will be focused at the four main settlements
- Moderate levels of development will be allowed in larger villages
- Limited levels of development will be allowed in and around other specified villages
- Modest levels of development will be allowed in all other villages.
- Opportunities for the redevelopment of suitable brownfield sites will be maximised.
- Infrastructure, where needed, will be provided alongside new development including funding through the Community Infrastructure Levy (CIL)

The Waverley Settlement Hierarchy - Factual Update (2012) identifies Farnham as the most sustainable settlement in Waverley having regard to factors such as access to employment, public transport, services and environmental constraints.

The proposed sustainability credentials, other than the scale of the development largely remain as previously considered under WA/2008/0788. The previous appeal was dismissed on grounds of sustainability of the location and the resultant impact of additional traffic on the local road network, acknowledged by both the Inspector and the Secretary of State in the 2009 appeal decision (Planning Ref: WA/2008/0788).

The Secretary of State's decision stated at paragraph 27 that:

"The site is in an isolated rural location and the road network around it consists primarily of narrow country lanes... The site is not served by public transport."

"The additional daily vehicular movements resulting from the development would put severe and unacceptable pressure on an overstretched road network in which there is only limited scope for improvement."

"...notwithstanding the reduced reliance on the private car, the development would still generate a considerable amount of additional road traffic. In that respect it would not be compatible with the existing transportation infrastructure of the area, and would not be sustainable in transportation terms."

The location of the site is relatively poor in terms of its proximity to public transport, local centres, education and health facilities. However, it is also noted that the existing site does offer some facilities in and around the appeal site, which include an existing nursery school, on-site café and the Jigsaw School. A public house is also located close to the Compass Bridge access and a local shop exists in Alfold.

The application is accompanied by a Sustainability Appraisal. This concludes that “we are of the opinion that the site offers a significant opportunity for major housing growth for meeting the needs of the Borough in a location that can be made sustainable”. The applicant also states that (the Council’s own Sustainability Appraisal) “significantly underplays the sustainability credentials of Dunsfold Park. Our (the applicant’s) own assessment clearly demonstrates that many of the criteria previously considered either Amber or Red can in fact be graded with a Green rating on the basis of various mitigation measures which can be implemented as part of the scheme such as improved public transport infrastructure, schools and shopping facilities”.

The Council’s Sustainability Appraisal of the Local Plan (2016) includes an assessment of allocated and LAA (Land Availability Assessment) sites, which includes the application site. This document recognises that a focus on development at Dunsfold is less than ideal from a transport perspective due to the site’s relatively isolated location which can lead to high levels of car dependency.

The SA attributes the site a red score in terms of its proximity to the following services:

- Town Centre (more than 800m)
- Primary school (more than 800m)
- Secondary school (more than 60 min walk)
- GP/health centre (more than 800m)
- Local Shop (more than 800m)
- Train station (more than 800m)

In addition to the SA, Mott MacDonald has undertaken a Stage 4 Transport Assessment Report which includes an assessment of some sites including Dunsfold Park. The purpose of this document was to assist with the pre-submission Local Plan Part 1. Nonetheless, the document has some relevance to the current application.

Mott Macdonald’s report supports the findings of the SA, noting that Dunsfold Aerodrome (as existing) does not have access to key services including public transport, education facilities, and town centres. The report comments that

internal trips to work are assumed to be made by walking and cycling. Therefore, by encouraging sustainable travel modes there is the potential to minimise external trips away from the site by car. Given the location, walking to work locations (outside of the application site) is unlikely and there is low potential for a frequent bus service to major employment centres to be viable in the long term.

The application proposes to improve the suitability of the location of the site through the provision of the following services:

- New local centre
- On-site 2-form entry primary school providing 420 spaces
- Open space, play space and sports space
- Enhanced bus provision
- A design concept to encourage the use of the car and cycle
- Increased amount of employment floorspace to increase the opportunity to work and live in the same village
- Improved pedestrian and cycle links beyond the boundaries of the Site including a new cycle route between the site and Cranleigh
- Pre-School
- Health Centre / Doctors' Surgery
- Convenience and comparison retail units
- Community building

The proposed bus services would comprise:

- Route 1 Dunsfold Park – Guildford;
- Route 2 Godalming – Dunsfold Park – Cranleigh;
- Route 3 Cranleigh – Dunsfold Park – Horsham.

When the site is fully built out, this will lead to peak hour frequencies of:

15 minute to/from Cranleigh;

30 minute to/from Guildford;

30 minutes to/from Godalming and Horsham.

Proposed bus service frequency:

Route		Frequency Monday - Saturday			Frequency Sunday
		Peak Hours	Daytime	Evening	Daytime
1	Guildford – Dunsfold Park	15	20	30	60
2	Godalming – Dunsfold Park – Cranleigh	20	30	60	60
3	Cranleigh – Dunsfold Park – Horsham	20	30	60	60
2 & 3	Between Cranleigh and Dunsfold Park	10	15	30	30

The proposed heads of terms in respect of the current application include a contribution to the secondary school in Cranleigh to accommodate extra demand from the development. The applicants contend that the above mentioned bus service would be of a sufficient frequency and quality to provide access from the site to the secondary school.

The submitted Sustainability Appraisal with the application criticises the Council's (2014) SA. An updated Strategic SA has since been produced, as well as the Mott Macdonald Report (2016). The main criticism is that the strategic documents do not take account of the potential of the site to provide new infrastructure, and transport links. Such infrastructure would clearly impact on the sustainability of the location of the site. The large scale of the application means that it could justify and sustain the provision of new infrastructure as referenced.

However, the level of weight/benefit to be attached to the proposed infrastructure improvements is highly dependent on the certainty attached to their deliverability and viability. The Inspector, in considering the previous appeal (WA/2008/0788), and the Secretary of State, were concerned that should these improvements (proposed bus service) along with other (proposed) services fail, the consequences of their failure would be very severe given the scale of the site and inherently unsustainable location of the site. As a result, in assessing the current application, the Council would need to be satisfied that the bus service improvements could be maintained in perpetuity and that they provide an attractive alternative to the use of a private car for future residents. The Council would also need to be satisfied that the bus service could be provided at an early stage of the development to inform the travel modes of the residents living within the early phases of the scheme. The detail of the proposed bus services are set out in the table above, and are discussed in further detail within the Highways, access and parking Section of this report.

In addition to the deliverability and viability, it is important that the appropriate infrastructure is provided at an early stage. The early delivery of the other services / facilities noted above would also be required. Interim infrastructure improvements may also be required from the early phases of the development, to seek to mitigate any unacceptable harm to service provision for existing residents in the surrounding villages.

Officers accept that the mixed use development would allow for some residents to live and work on-site which could lead to a degree of "internalisation". However, the proposal would not be completely self-contained as future residents would still be dependent on nearby settlements



for facilities such as secondary schools, shopping and access to the rail network.

The County Highway Authority has raised objection in respect of the isolated location of the site, and raises concern that the creation of a new settlement in this relatively remote part of the Borough would result in greater distances being travelled and less sustainable travel choices than would be the case if the quantum of housing were located either within, or adjacent to the existing urban areas which are creating the demand for the additional 1800 homes. Uncertainty over the likely age of future occupants of Dunsfold adds to this concern. Nevertheless, the sites location and transport sustainability is just one matter to be considered in the overall consideration of sustainable development.

Officers consider that great weight can be attached to the Government's clear support for self contained new settlements as a form of sustainable development. This is referred to in paragraph 52 of the NPPF, and is a clear policy change, since the consideration of the appeal scheme.

Furthermore, whilst Officers acknowledge that the site is in a location which is remote from existing facilities, the proposal would provide a range of day to day facilities. These include the provision of a country park, a primary school and nursery school, retail and commercial uses, community centre, health centre, sports and play provision, the Borough's largest employment site, together with sustainable travel measures, which include the provision of a bus service providing links to a number of key destinations.

It is considered by Officers, that the range of facilities that would be provided, together with the proposed transport facilities, would satisfactorily mitigate and balance out the isolated nature of the site's location.

#### Loss of airfield and existing employment uses

Neither the adopted Local Plan or the pre-submission Local Plan Part 1 contains a specific policy that could be used to resist the principle of the loss of the airfield or flying use in itself.

Policy IC2 of the adopted 2002 Local Plan states "The loss of suitably located industrial and commercial land will be resisted."

Whilst the proposal could result in the cessation of a small portion of the existing 2007 B1 Business, B2 General Industrial, and B8 Storage or Distribution and ancillary flying uses, this planning permission is time limited to 2018, therefore there would be no long term loss of that use over and above

that already intended. In any event the outline and full elements of the proposal together seek to provide 32,166 square metres of additional employment floorspace resulting in a total of 68,866 sqm which it is estimated would increase the overall number of jobs on the site to some 2,700. The full part of the application would provide potentially 36,692 sqm of floor area. As such, there would be no net less of employment/commercial floor area and no objection in terms of Policy IC2 of the adopted 2002 Local Plan.

The importance of Dunsfold Park to employment in the Borough is recognised in the Council's Employment Land Review and Economic Strategy.

Paragraph 33 of the NPPF states that planning authorities should take account of the role of airfields in serving business, leisure, training and emergency service needs. The NPPG sets out that aviation makes a significant contribution to economic growth and that aerodromes form part of a larger network. It sets out that LPAs should have regard to the extent to which an aerodrome contributes to connectivity outside its boundaries. There is no policy relating to aviation use within the Waverley Borough Local Plan.

Guidance produced by the General Aviation Section and published by the Department for Transport recognises the importance of securing the on-going future and potential of GA aerodromes as a local and national resource for the promotion of local jobs and growth. The guidance advises the following where the closure of an aerodrome is proposed:

- Any change of use from its role as an airfield should only be permitted after the planning authority has fully considered the extent to which the aerodrome has contributed to connectivity outside its own boundaries.
- Options should be explored such as mixed use development (NPPF paragraph 17), allowing aviation to be continued, developed or adapted alongside other land uses.
- The LPA should consider encouraging owners of airports intended for closure to complete full and proper consultation, operate a cooling off or review period in which demolition, asset sale or other disposal of key airport equipment do not take place.

The guidance also recognises the importance of aerodromes in the following:

- Maintaining access to a national network of general aviation airfields
- Meet a practical need in pilot training for a hierarchical airfield network to enable new pilots to be properly trained in different airfield environments, as well as allowing progressive training from basic to more complex and sophisticated aircraft.

The applicant contends that the proposal would comply with the General Aviation guidance, as well as the NPPF and NPPG. It is contended that there are a number of other airports and aerodromes in and near Surrey that would provide for aviation needs. This includes airports that are well linked to the strategic road network to provide access for business travellers. As such, it is considered that the aviation connectivity of the county and wider area with other parts of the UK and further afield would not be harmed through the cessation of Dunsfold Aerodrome. There are two aerodromes that provide training for pilots and flight schools in Surrey together with airports adjoining the County that provide training facilities. There is no emergency service use of the site. The other airports that are referenced by the applicant are Fair Oaks Airport, Redhill Aerodrome, Biggin Hill airport, Farnborough and Gatwick airport.

The guidance places a significant emphasis on the consideration of mixed uses that incorporate the existing airfield. The existing site is a mixed use site which includes a variety of temporary employment uses. The planning history for the site demonstrates that over the site's history the range and scale of employment uses have expanded. It should also be noted that an operational aerodrome and residential dwellings are generally not compatible uses given the noise that is generated from the aerodrome.

In assessing the loss of the existing aerodrome, reference must be made to the lawful fall back position. Namely, the existing temporary uses would cease in 2018 and the lawful use would be likely to revert to the aircraft testing and repair only – this is clarified by decision WA/2011/0520. Critically, as set out above in the planning history section, the lawful use of the aerodrome is not for purposes of unrestricted flying and arguably therefore there is no overriding objection in terms of the loss of an aviation use.

The closure of the aerodrome would not harm the UK's network of connected aerodromes nor will it harm the local or national economy. Importantly, Dunsfold Aerodrome is not a safeguarded aerodrome, by virtue of the town and country planning (safeguarded aerodromes, technical sites and military explosives storage areas) direction 2002.

As such, the proposal complies with the guidance set out in the NPPF and NPPG and the GAAC's document on aerodromes. Furthermore, given the lawful fall back position post 2018 which does not cover use of the site as an operational aerodrome, the majority of existing uses on site would cease in any event.

#### Proposed employment uses

The Government's growth agenda specifically supports the delivery of sustainable economic development and, in particular, Paragraph 20 of the NPPF advises LPAs to "plan proactively to meet the needs of business and support an economy fit for the 21st century".

Furthermore, Paragraph 21 of the NPPF recognises that planning policies should not hinder economic development and encourages LPAs to address any potential barrier to investment such as poor environment or lack of infrastructure. It states that policies should be flexible enough to accommodate needs which were not anticipated when preparing the development plan and that the Local Plan should "identify strategic sites for local and inward investment to match the economic strategy and to meet anticipated needs over the plan period."

Policy IC4 of the adopted Local Plan states that the Council will support proposals for the development/redevelopment of existing industrial and commercial premises where they do not conflict with other policies in the Plan. Where proposals relate to an existing industrial and commercial site outside a settlement, the Council will support proposals which meet the above criteria and which:-

- Do not involve a material increase in bulk or floorspace over that which currently exists within permanent and substantially constructed buildings on the site;
- Do not occupy a materially larger area of the site than the existing buildings;
- Do not materially extend beyond the existing principal buildings into open land, or
- Do not have a materially adverse effect on the appearance of the Countryside or the amenities of nearby properties
- Have no detrimental increase in traffic and
- Can achieve satisfactory vehicular access

Waverley Borough Local Plan 2002 is consistent with the NPPF with regards to securing economic growth. The Keynote Policy of the Local Plan states:

"The Council, through the Local Plan, will seek to maintain and improve the quality of life in Waverley without compromising the ability of future generations to meet their needs and to enjoy a high quality environment. This means protecting and enhancing the Borough's environmental quality and providing for homes, jobs, infrastructure and services without undermining the value of the built, natural and man-managed environmental resource."

Taking account of the planning context for Waverley, the Keynote Policy can be developed into a number of aims relating to the themes of inter alia securing a healthy economy. Aim 5 of the Local Plan seeks to help to achieve a healthy economy in a way which conserves and enhances the quality of the Borough's environment and infrastructure.

Policy EE1 of the Pre-submission Local Plan Part 1 states that the provision of development for economic growth to meet the needs of the economy, including at least 16,000 sq. m of new Use Classes B1a/b floorspace, will be delivered through the allocation of sites for additional employment floorspace. This includes on land at Dunsfold Aerodrome in accordance with Policy SS7 of this Plan. Officers note that whilst there are unresolved objections to Policy EE1, these mainly concern the amount of employment land, lack of support for rural employment and tourism. It is considered that the objections to the policy could be defended, and that the policy would be found sound. However, until the plan has been formally examined, the objections remain unresolved and as such, only limited weight can be attached to it. Nonetheless it remains a material consideration and a useful indicator as to the level of employment that is likely to be required within the plan period.

The figure for the employment floorspace contained within Policy EE1 relates specifically to at least 16,000 sq.m of new Use Class B1a/b floorspace across the Borough whereas the total amount of employment floorspace required under criterion b) of Policy SS7, and proposed as part of this application, refers to total employment space which includes all B use classes. Policy EE1 does not preclude employment development for other B classes. It just sets out a minimum target for B1a/b land in the plan period but still seeks to ensure that there is a flexible supply of employment premises including a continuing supply of B1c, B2 and B8 floorspace. Furthermore, SS7 is a site specific policy which addresses the employment need that would be generated within the new settlement itself, and that would be necessary to create a self contained settlement.

The approach to employment floorspace required in Policy EE1 of the Pre-submission Local Plan Part 1 Local Plan is informed by the Council's Employment Land Review (ELR) updated in 2016. This is a supporting evidence for the Local Plan and therefore is a material consideration in the determination of this application. The quantitative analysis of need for employment floorspace in the ELR is based on a realistic scenario of economic growth that is aligned with the Council's Economic Strategy 2015 – 2020. Although it found that there was a surplus of B1c Light Industrial, B2 General Industrial and B8 Storage or Distribution floorspace, a qualitative analysis of business requirements and the local property market found that

the market was constrained by a lack of a flexible supply of premises to meet need and attract new investment.

The fact that Dunsfold Park is the largest employment site within the Borough is also a material consideration.

The applicants have stated that the proposed total quantum of industrial/commercial floorspace (within the B Use Classes) would total 68,866 sqm, a net increase of 24,137 sqm or 54%. Their justification for this increase is:

- Secure the long term future of the existing business park and the jobs it provides
- Rationalise the existing park through selective demolition of older buildings, retention of existing buildings and construction of new buildings resulting in a more efficient use of the site with purpose-built facilities
- Provision of a range of new floorspace across the B Class Uses would create a diverse business environment.
- A range of unit sizes including small-medium business enterprise space that would appeal to start up companies and small businesses

In relation to the assessment of permission WA/2015/0695, officers noted that the majority of new additional floorspace proposed had been pre-let (86%), that only a low percentage of the existing floorspace at Dunsfold Park is unoccupied. It was considered, in relation to that application that a need and interest existed for additional commercial/industrial floorspace.

The provision of additional floorspace would have a key role to play in the sustainability of the site. The applicants contend that the scheme would have a degree of internalisation, with the opportunity for new residents to both live and work on site.

The provision of new starter units/workshops for small and start up companies is a key benefit to the proposal. However, the amount of the space designed for these companies specifically has not been quantified. A condition is recommended to require full details of the floorspace/units to be provided for start up companies. It is a key priority for the Council to support small/start up businesses, the offer to provide start up units to meet this demand is therefore a key benefit to the application.

It is considered that the proposed residential dwellings, would result in extra demand on for employment uses at Dunsfold Park, and that the proposed floorspace would contribute in meeting this.

The additional employment space, once occupied whether by residents or commuters, would provide additional footfall which would help to sustain the proposed village centre and its retail uses, as well as the proposed community uses.

Officers have had regard to the NPPF's support for sustainable economic growth under paragraphs 19 and 20. Officers are therefore satisfied that there is a need for the proposed additional employment uses as part of the scheme, and that the proposal would provide more efficient and up to date floor space which is a material benefit to the proposal. The principle of the increase in floor space is therefore considered to be acceptable.

### Main Town Centre Uses

The NPPF and Policy TC1 of the Local Plan set out that town centres should be recognised as the heart of a community and any proposed development should support their vitality and viability.

The NPPF states that planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. For retail development outside of town centres, a Retail Impact Assessment should be submitted if the development would exceed 2,500 sqm. This requirement is supported by policies S1 and TC1 of the Waverley Borough Local Plan 2002.

In addition to considering the potential impacts of the local centre on neighbouring village/town centres, compliance with the sequential test requirement in the NPPF, it is also relevant to consider the viability of the proposed centre in the longer term. This is particularly important given the role it would play in delivering a sustainable development.

The proposal includes a new local centre and associated uses comprising a single convenience store of up to 750 sqm gross/525 sqm net sales area and up to 1,400 sqm gross of other services within Use Classes A1 (shops)/ A2 (financial and professional services)/ A3 (restaurants and cafes)/ A4 (drinking establishments) / A5 (hot food takeaways). This is intended to serve both the residential part of the site and the industrial/business uses.

Whilst the floorspace falls below the 2,500 sqm threshold within the NPPF for a retail impact assessment, such an assessment has nonetheless been undertaken by the applicants and submitted with the application.

The Council has appointed Chase & Partners to review the submitted Retail Impact Assessment, who have concluded the following:

“The scale and form of the centre would mean that it would only attract a proportion of its total trade from the immediate rural area around the airfield and very little from the wider catchment .... Residents in this area are more likely to continue to use existing, larger centres – particularly Cranleigh – for their day-to-day shopping and service needs rather than the comparatively small local centre being proposed”.

Chase & Partners advise that the applicants have not explored whether or not the proposed retail centre could be located within an existing local centre such as Cranleigh, Dunsfold or Alfold. However, officers consider that any location of the centre outside of the application site would in this instance be contradictory since a more remote location for retail would effectively encourage car travel of the residents of the new settlement and would reduce the sustainability of the site's location. As such, in view of the nature of the proposal as a standalone settlement with its own complementary retail facility, no objection is raised in respect of a failure to meet the sequential test.

The proposal has the potential to impact on the vitality and viability of Cranleigh Centre. In addition, shops in the villages of Dunsfold and Alfold could be impacted upon. These are protected by Policy S2 of the Local Plan.

The Retail Impact Assessment finds Cranleigh to be a “relatively vibrant town centre despite the economic downturn”.

The applicant has regard to the possibility of a range of size convenience stores that could be proposed as part of the overall retail floor space. In addition, turnover projections for the store are provided. In addition, detail is provided on the retention rate and potential draw of the proposed centre. Having regard to this, the Council's consultants conclude the following:

“The proposed mix of uses outlined in the TCRS is reasonable and proportionate to a local centre of this type. It is unlikely to have an unacceptable impact on Cranleigh or other nearby centres and, indeed, could provide a facility capable of meeting many of the day-to-day service needs of the new community.”



In respect of the impact of the proposed centre on the villages of Dunsfold and Alfold the Council's consultants comment that:

"It would, of course, also be relatively accessible to existing residents in the rural areas immediately around the airfield – including the villages of Dunsfold and Alfold. However, agree with the applicants that the scale and form of the centre would mean that it would only attract a proportion of its total trade from the immediate rural area around the airfield and very little from the wider catchment. Residents in this area are more likely to continue to use existing, larger centres – particularly Cranleigh – for their day to day shopping and services needs rather than the comparatively small local centre being proposed at Dunsfold."

The proposal would not in strict policy terms pass the retail sequential test requirement of the NPPF. However, given the overriding role of the local centre to meet the day to day needs of the new residential development, it is considered wholly appropriate to provide it on site. Having regard to the advice of the Council's consultants, officers are satisfied the local centre is not of a sufficient scale so as to adversely affect the vitality or viability of retail shops/local centres on the nearby villages of Cranleigh, Dunsfold and Alfold.

#### Loss of Agricultural Land

The NPPF states that, where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. This sentiment accords with Policy RD9 of the Local Plan which states that development will not be permitted which would result in the loss or alienation of the best and most versatile agricultural land unless it can be demonstrated that there is a strong case for development which overrides the need to protect such land.

The proposed new settlement is indicated as largely taking place within the confines of the existing airfield and the majority of the site is not therefore agricultural land. However, the exception to this is the indicative access road leading from the A281. This would cross over agricultural land, of which is located to the east of the site and adjacent to the A281. The Council's Agricultural Consultant has advised that this would amount to circa 5ha.

The applicants have indicated that the loss of this area of land for the access road is necessary due to this being the only boundary with the A281. The indicative location is designed to minimise the loss of woodland. The applicant's Environmental Statement concludes that the loss of the 5ha of

land that could be classified as class 3a agricultural land is minor negative and not therefore significant.

The Council's Agricultural Consultant has advised that there is no published information confirming the quality of the land to be lost. The submitted Environmental Statement indicates that the agricultural land would include Grade 3a (good) quality land. This is understood to represent a worse case scenario from the developer's perspective. The Agricultural Consultant considers that this is unlikely to be the case given that the site lies over Weald Clay, and that it is likely some of the land would instead be classified as subgrade 3b. The Council's consultant therefore agrees with the conclusion that the impact of the loss of the agricultural land would be minor adverse.

There is no information to indicate that there would be any impact on agricultural holdings. The Council's Agricultural Consultant has advised that it appears the land is farmed in association with other arable land in the vicinity, and it is unlikely that the loss of 5ha of agricultural land on the fringe of an arable unit would result in its fragmentation such to undermine its viability.

It is clear from the Council's Agricultural Consultant's response, and the submitted information, that the loss of the agricultural land would not result in the fragmentation of agricultural holdings such as to undermine the viability of the remaining holding. It is however noted that the proposal could result in the loss or alienation of the best and most versatile land. However, Policy RD9 advises that the loss of agricultural land can be acceptable where there is a strong case for development which overrides the need to protect such land. In this case, the proposal would deliver a significant amount of housing comparatively; the amount of the best and most agricultural land to be lost is very modest. The benefits of the provision of the housing, would therefore override the need to protect the agricultural land.

The Council's Agricultural consultant has, however, advised that should permission be granted, a condition should be imposed to secure the sustainable re-use of soil in line with DEFRA's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites

The proposed loss of agricultural land is therefore considered to be justified, and to comply with Policy RD9 of the Waverley Borough Local Plan 2002.

#### Impact on the Countryside

Paragraph 17 of the NPPF 2012 sets out that within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles

are that planning should: inter alia take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.

Policy C2 of the Waverley Borough Local Plan 2002 states that building in the countryside, away from existing settlements will be strictly controlled.

Policy C2 of the Waverley Borough Local Plan 2012 is consistent with Paragraph 17 of the NPPF 2012 in that it seeks to protect the intrinsic character and beauty of the countryside. Policy RE1 of the Pre-submission Local Plan Part 1 echoes the safeguarding of the intrinsic character and beauty of the countryside in accordance with the NPPF.

The NPPF states that planning permission should be refused for development resulting in the loss or deterioration of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development clearly outweigh the loss.

Policy D7 of the Local Plan broadly support the aims of the NPPF stating that the Council will protect significant trees and groups of trees and hedgerows through planning control.

The application site lies within the Countryside beyond the Green Belt as defined by the Local Plan 2002 and the pre-submission Local Plan Part 1 2016. The site is located within and surrounded by a rural area of great character and natural beauty. The site is also in close proximity to the Surrey Hills AONB which is located circa 1.3 km to the north of the site.

In respect of the countryside character, and the impact of the proposal on it, the applicants have commented:

“The majority of the potential visual impact is from long distance when viewing the Site from the surrounding Hills. The Site presently contains a substantial operational runway, various other areas of hardstanding and a number of stationary aircraft, none of which are common features of the wider rural landscape,” and “The proposed development will, however, include very significant areas of strategic landscaping along with additional tree planting through the area of built development.”

The characteristics of the site and the surrounding landscape have not materially changed since the consideration of the earlier dismissed scheme (WA/2008/0788), with the exception of the construction of the solar farm,

which is located to the north / north-east of the airfield. The site boundaries remain with mature hedgerows and woodland enclosing the site, meaning that views into an out of the site from important view points are restricted.

The Secretary of State and the Inspector, in assessing the 2008 appeal, concluded the following in respect of the impact of the proposal on the character and appearance of the countryside, including having regard to any impact on the adjacent AONB.

The Inspector in determining the appeal stated: (The proposed development would be visible from views from the Surrey Hills AONB but), “the development would have less visual impact on views from the AONB than the existing aerodrome. The inclusion of lakes, and a great deal of landscaping would help blend the development into the surrounding countryside, as well as increasing the visual interest and attractiveness of the site. Improved public access could only be a benefit to the wider community.”

The Planning Inspector concluded: “the proposed development would not cause material harm to the character and appearance of the countryside and that, in that respect, it would comply with saved policies C2, D1 and D4 of the Waverley Borough Local Plan 2002.”

The Secretary of State’s decision states:

“The Secretary of State observes that the scheme would include lakes, a great deal of landscaping within the village and the creation of a country park and, like the Inspector, he considers that these elements of the scheme would help blend the development into the surrounding countryside, as well as increasing the visual interest and attractiveness of the site. He has also had regard to the extent to which the scheme would give improved public access to the site and, like the Inspector, the Secretary of State considers that this could be a benefit to the wider community. Overall, for the reasons set out by the Inspector, the Secretary of State agrees with the Inspector’s conclusion that the proposed development would not cause material harm to the character or appearance of the countryside and that, in that respect, it would comply with saved policies C2, D1 and D4 of the WBLP.”

The application site remains in a comparable form to the time of the appeal. Namely that the airfield has no material visual appeal and is occupied by airfield buildings of no aesthetic value, and the aerodrome itself comprising areas of concrete and mown grass.

The proposed residential element of the scheme is in outline form; however the principle of a residential village, in line with the indicative details set out,

would be more reflective of the area's rural surroundings than the existing airport use.

The impacts on the countryside and surrounding landscape character could be expected to reduce, as the scheme develops, landscaping is finalised, and planting matures. The Landscape Visual Impact Assessment (LVIA) concludes that the effect upon the character and quality of the AGLV would be small and would reduce to "imperceptible" at year 10 as planting matures.

The extent, to which the proposed development would appear a traditional Surrey village, would be dependent on the style, character and appearance of the proposed development. These are matters for consideration at the reserved matters stage. Reference has been made within consultee and third party responses, to the height of the buildings proposed, and concern is expressed that, owing to the proposed height of the buildings, these would not be in keeping with a traditional village setting, and would result in harm to the landscape character and countryside setting over and above the existing aerodrome. Whilst information has been provided in respect of the heights of buildings, and the proposed layout, this is only indicative. The height parameters provided include a maximum of 4 storeys within the core of the development. This is less than the height of the existing tail fin of the plane on site. The Design and Access Statement suggests that the architecture of Dunsfold Park should reflect the Surrey vernacular in its scale, form and design. Officers are satisfied that this design approach could be achieved, through any subsequent reserved matters application.

The proposal would facilitate public access within the site and would deliver a significant extent of landscaping including a 3ha extension to Farnhurst Copse, a new country park, open space and pedestrian and cycle routes through the site. At present, there is no public access to the aerodrome. These would serve to improve public participation in, and enjoyment of, the countryside.

In the assessment of the current application, having regard to the scale and quantum of development, the level of landscaping and open space proposed, and the indicative layout, officers consider that the Inspector's and Secretary of State's conclusions in respect of the 2008 appeal remain relevant. Namely, the proposed development would be more in keeping with the rural landscape than the existing aerodrome. Whilst the internal character of the site would be a significant change, the impact from external viewpoints would be limited.

There would be significant benefits to the countryside, by virtue of the extensive provision of open space proposed, and the improvements to access to the countryside. There are considered to be sufficient benefits in respect of

the impact on the countryside and the existing landscape character, to outweigh the modest impacts from a small number of viewpoints. Officers are therefore of the view that, on balance, the proposal would not materially prejudice the openness, character and natural beauty of the open countryside and that it would accord with Policy C2 of the Local Plan, Policy RE1 of the Pre-submission Local Plan Part 1, and the NPPF in this regard.

#### Impact on landscape character and AONB/AGLV

Paragraph 115 of the NPPF says that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty (AONB), which have the highest status of protection in relation to landscape and scenic beauty. In accordance with this, Policy C3 of the Local Plan 2002 requires development within the AONB to conserve or enhance the character and beauty of the landscape. The Surrey Hills Management Plan 2014 – 2019 sets out the vision for the future management of the Surrey Hills AONB by identifying key landscape features that are the basis for the Surrey Hills being designated a nationally important AONB.

Section 85 of the Countryside and Rights of Way Act 2000 states that in exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.

Policy RE3 of the Pre-Submission Local Plan Part 1 states that in respect of the AGLV, the same principles for protecting the AONB will apply in the AGLV, which will be retained for its own sake and as a buffer to the AONB, until there is a review of the Surrey Hills AONB boundary.

There are some unresolved objections to Policy RE3, indicating that stronger wording is required, candidate areas should be subject to AONB policy and certain comments regarding individual sites within the AONB/AGLV. Officers are satisfied that, subject to some amended wording, this Policy would be found sound. Notwithstanding this, given it has not yet been examined, only significant weight can be attached to the policy. However, for the purposes of this application, Policy C3 and the relevant paragraphs of the NPPF have been given greater weight.

In respect of the appeal for WA/2008/0788, the Planning Inspector found the impact on the AONB to be acceptable, commenting “The viewpoints in question are a considerable distance away. The nearest, Hascombe Hill, is 2.5 km distant. From these vantage points very little can be seen of the existing buildings and the most prominent feature is a Boeing 747

permanently parked on the runway. The village would feature in these views but it does not follow that it would be obtrusive. For practical reasons, airfields are usually sited in the countryside but they and their associated activities and structures are hardly traditional features of the rural scene. In contrast, the sight of a distant village is something to be expected in a panoramic view of the English Countryside.” The Inspector goes on to state “I do not accept that the site, in its present state, makes a positive contribution to the appearance of the landscape around it.”

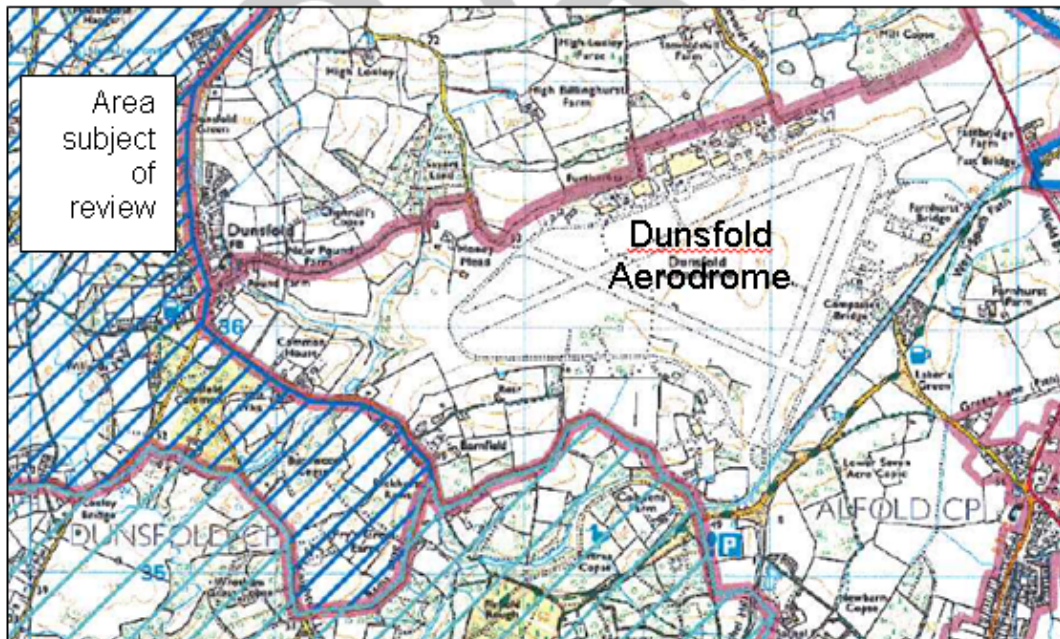
In comparison with the time of the determination of the appeal scheme (WA/2008/0788), the publication of the NPPF reiterates that weight that should be attached to protecting the landscape character within the AONB is ‘great’. Notwithstanding this change in the policy context, officers still consider that, owing to the slightly lesser impact of the current scheme (reduced number of dwellings and reduced traffic movements), in comparison with the proposed, these comments weigh heavily in favour of the current application.

Officers have taken into consideration that the Boeing 747 is a temporary feature, and would not be expected to remain post 2018 when the existing temporary permissions on site expire. Nonetheless, the existing buildings on site benefit from permanent permissions.

The application site lies outside of the AONB, and as such the tests of Paragraph 116 of the NPPF, which states that permission should be refused in designated areas (such as the AONB) except in exceptional circumstances, are not engaged.

Natural England is proposing to carry out a review of the boundary of the Surrey Hills AONB and this could result in some parts of the Area of Great Landscape Value (AGLV) being incorporated into the AONB. The AGLV surrounding the site is a “candidate area” for inclusion within the AONB. The outcome of that review is not expected until at least 2018. Until such a time as that review is undertaken, there is no change to the status of these areas.

Plan showing AONB candidate area:



In respect of the landscape character the applicants make the following comments:

The site is considered to be at the boundary/transition of three areas: The Alfold Crossways Wey and Arun Clay Vale, Dunsfold Undulating Clay Weald, and the Loxhill Clay Slopes. Impacts on these areas could be appropriately mitigated through the inclusion of new, and enhancement of, existing vegetation across the site. There would also be views from 5 other landscape areas: Baynards Undulating Clay Weald, Ewhurst Clay Slopes, Hascombe Sandstone Hills, Peaslake Sandstone Hills and the Godalming Sandstone Plateau. However, in general, the site is well-enclosed within the surrounding woodland which is considered to minimise the potential for adverse impacts.

The applicants conclude that whilst there would be significant impacts on the landscape character from particular viewpoints during the construction phase, these impacts would be temporary. In respect of the longer term impact, the applicants conclude that the impact on views from the AONB, in particular from Hascombe Hill, these impacts would be “moderate” reducing to “not significant” in year 10 of operation. In respect of how the development could affect the special qualities of the AONB, the applicants comment that although the development would be visible from certain points such as Hascombe Hill “the development will not alter the mosaic of farmland, woodland, heaths, downs and commons that define the special qualities of the AONB”.



Natural England has provided comment on the impact of the development on the AONB, and has advised that it has no fundamental objection subject to the provision of appropriate mitigation measures.

In the original response from Natural England (NE), objection was raised in respect of the methodology used within the LVIA. Specifically, gaps were identified where viewpoints had not been considered. NE also commented that the significance of visual impacts on the AONB and its setting, particularly during operation, were underestimated. Natural England also advised that “there is a potential for a significant impact on the purposes of the designation of the AONB” and noted that “the proposed development will be visible at least in part from several prominent locations along public pathways within the AONB.” However, following the submission of additional information Natural England has advised that they have no fundamental objection subject to the provision of appropriate mitigation measures.

The objection from the Surrey Hills Board AONB officer has been carefully considered. The key concern raised by the AONB officer in respect of the impact on the countryside is: “The considerable amount of road traffic poses one of the greatest threats for some decades from a single development to the protected character and tranquillity of extensive parts of the Surrey Hills AONB.”

In terms of the impact on tranquillity, the following conclusion by the Planning Inspector in dismissing the 2008 appeal is of particular relevance: “Any harmful effect that the extra traffic might have would be offset by the cessation of the existing noise activities, both aerial and terrestrial ... I consider that the development would not, therefore, affect the tranquillity of the area.”

It is of note that in comparison with the 2008 appeal scheme, the current proposal is for a reduced number of dwellings. Furthermore, it should be noted that the HGV vehicles from Dunsfold Park only make up a small proportion of traffic on roads to the west. This conclusion is supported by the findings that are summarised in the ‘Highways, Access and Parking’ section of this report, following Mott McDonald’s further work on behalf of the Council to ascertain the current trends of HGVs, in terms of their distribution upon the local highway network. In addition, the predicted vehicle movements set out in the applicant’s transport assessment would be reduced from the predictions upon which the appeal decision in 2009 was based, as the increases envisaged have not resulted. As such, there are considered to be no changes in circumstances since that decision which would warrant a different conclusion in respect of the impact on tranquillity.

Views into the site are limited due to the location of the site within a depression, and intervening ridges screen views between the AONB and the site from lower slopes. Upper slopes are in the most part wooded providing further screening. The proposal is supported by a full Landscape and Visual Impact Assessment contained within the Environmental Statement. This identifies that the most significant visual changes would be internally within the site, views from the A281 and surrounding access roads, and a small number of viewpoints from the AONB ridge. The LVIA identifies impacts on views from Hascombe Hill to the north west of the site and users of the footpath from Barnfield to the south of the site (reference FP299). Hascombe Hill is located some 3 to 3.5m away in the Surrey Hills Area of Outstanding Natural Beauty (AONB). From there, Dunsfold is seen to be set amongst open countryside which stretches to the distant South Downs.

The built development would be visible from some parts of the AONB (for example from Hascombe Hill); it would form part of a wider landscape context which already includes built development including the aerodrome and Alfold Crossways. Officers concur with the conclusions drawn by the applicants and the Secretary of State (in relation to the WA/2008/0788 appeal) that the proposal would not alter the mosaic of farmland, woodland, heaths, downs and commons that define the special qualities of the AONB or the experience of the majority of people visiting the AONB.

Notwithstanding this, officers acknowledge the comments of Natural England, and agree that there is the potential for significant impacts on views from public footpaths within the AONB (in particular Hascombe Hill), and the view of the site could be considerably changed owing to the scale of the development proposed. In particular, it is considered that there would, initially within the operational phase, be significant impacts on views from within the AONB. However, officers are also consider that, due to the amount of open space on site, and the potential for significant areas of landscaping and planting, that the longer term impacts could be reduced to be “not significant”.

The applicants have submitted additional information regarding visual mitigation for the proposed development in response to the Natural England response.

The key features of the mitigation include:

- Layout of a compact form to minimise footprint
- Provision of a large Country Park on the western side to enhance views from the AONB
- Buildings heights typically restricted to between 2 and 3 storeys
- Green roofs on selected larger buildings

- Retention of existing vegetation together with supplementary additional planting

The details put forward are at this stage indicative. The mitigation details proposed relate to details that would be considered at the reserved matters stage and through the provision of the Country Park. Natural England's response to the additional mitigation information is awaited, a further update will be provided to the committee upon receipt of this.

Notwithstanding the outstanding response however, Natural England acknowledges that its objection could be overcome by mitigation, and officers consider that appropriate mitigation could be secured. Furthermore, the conclusions of the Secretary of State remain highly relevant.

In respect of the proposed employment uses, woodland to the north of the site, which is within the applicant's ownership, would largely screen the proposed employment buildings from wider views. Where glimpses of the new buildings would be available, these would be viewed in the context of the existing large commercial buildings at Dunsfold Park. As a result, the proposed buildings would not harm views out of the AONB, nor would they harm the adjacent AGLV.

In conclusion, notwithstanding that the final response from Natural England is awaited, the adverse visual impacts of the proposal could be appropriately mitigated, and subject to this, the existing landscape character would be preserved. The proposal would therefore accord with Policy C3 of the Waverley Borough Local Plan 2002.

#### Light Pollution, impact on dark skies and tranquillity of the AONB

Policy D1 of the Waverley Borough Local Plan 2002 states that the Council will have regard to the environmental implications of development and will promote and encourage enhancement of the environment. Development will not be permitted where it would result in material detriment to the environment by virtue of *inter alia* (c) loss of general amenity, including material loss of natural light and privacy enjoyed by neighbours and disturbance resulting from the emission of noise, light or vibration; (d) levels of traffic which are incompatible with the local highway network or cause significant environmental harm by virtue of noise and disturbance; (e) potential pollution of air, land or water, including that arising from light pollution and from the storage and use of hazardous substances; In the same vein Policy D2 states that the Council will seek to ensure that proposed and existing land uses are compatible. In particular *inter alia* (a) development, which may have a

materially detrimental impact on sensitive uses with regard to environmental disturbance or pollution, will not be permitted.

Surrey Hills AONB Management Plan Policy LU2 states that “Development will respect the special landscape character of the locality, giving particular attention to potential impacts on ridgelines, public views, tranquillity and light pollution.”

CPRE provides an interactive map of England’s light pollution and dark skies. This indicates the central part of the application site already falls within a ‘brighter’ region (2-4 nanowatts/cm<sup>2</sup>), with its eastern and southern parts generating between 1-2 nanowatts per cm<sup>2</sup> (category below brighter). To put these findings into context, central areas in Cranleigh generate 4-8 cm<sup>2</sup> and Alfold Crossways also falls into the 1-2 nanowatts per cm<sup>2</sup> category. Therefore, the existing site generates sufficient light for it to fall into the brighter category.

The Council’s Environmental Health Officer has considered the impact of light pollution, but no objection is raised in this respect.

The Surrey Hills AONB Officer has commented in paragraph 4.21 that the proposal would have a skyglow in an otherwise dark sky, and raises concern that “the combination of light pollution and traffic noise and disturbance resulting from the proposed development would have a significant impact upon tranquillity.” This asserts that the existing sky above the application site is dark. However, officers consider that this does not have regard to the published interactive light maps produced by CPRE which in fact show the sky above Dunsfold as already falling into the ‘brighter’ category.

It is acknowledged that the development is of a significant size and scale. In addition, it is not disputed that the proposal would result in an increased ‘sky glow’. However, the extent of the impact of this, given that it is already a brighter area of sky, would in the officers’ view not amount to a significant impact, either in isolation or in combination with the development.

Officers conclude that this would result in only a minor adverse impact. Nonetheless, this is an adverse impact to be weighed into the balance of considerations.

#### Highways, Access & Parking

The National Planning Policy Framework 2012 outlines that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. In considering

developments that generate significant amounts of movements local authorities should seek to ensure they are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Plans and decisions should take account of whether improvements can be taken within the transport network that cost-effectively limit the significant impact of the development.

Paragraph 32 states: “All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”.

The planning application is supported by a Transport Assessment (TA) produced by Vectos and dated August 2016. The August 2016 TA replaces the original TA submitted by the applicants.

In addition to the applicants’ TA, the following assessments have been considered in the determination of the application:

- Technical Note: HGVs associated with Dunsfold Development (August 2016) – produced by Mott MacDonald on behalf of the Council.
- Mott MacDonald Transport Assessment Stage 1 (February 2016) – produced on behalf of the Council
- Mott MacDonald Transport Assessment Stage 2 (February 2016) - produced on behalf of the Council
- Mott MacDonald Transport Assessment Stage 4 (June 2016) - produced on behalf of the Council
- Vision Transport Planning Transport Assessment Review for Joint Parish Councils (March 2016)

It should firstly be noted that whilst the above documents are important material considerations, it is for the applicant to demonstrate through their TA that the application is acceptable and for Surrey County Council, West Sussex County Council and Highways England as the relevant highway authorities to

review the acceptability of the development as to its impact upon highway safety and capacity.

The formal views of these highway authorities are summarised in the Consultation section of the report above. Notably, West Sussex County Council and Highways England have raised no substantive objection to the application, subject to the inclusion of mitigation through condition and Section 106 agreement. The formal response for the County Highway Authority is attached in full at Appendix 3. The County Highway Authority is not raising objection to the proposal on highway safety or capacity grounds, subject to satisfactory mitigation. The County Highway Authority raises objection on grounds of the unsustainability of the location of the site. This matter is addressed under the 'Location of development' above.

As such, a Paramics microsimulation model has been developed by the applicants that considers the A281 between Shalford (in the north) and Alfold Crossways (to the south).

The Paramics model is based upon the morning and evening peak periods on a weekday and therefore considers 3 hour windows in the AM peak period (07:00-10:00) and PM peak period (16:00 – 19:00). The model includes assessment of the following junctions:

- A281/A248 Kings Road, Shalford (3 arm roundabout);
- A281/A248 Broadford Road, Shalford (3 arm priority junction);
- A281/Station Road, Bramley (4 arm mini-roundabout);
- A281/Runcommon Road (3 arm priority junction);
- A281/Barrihurst Lane (3 arm priority junction);
- A281/Elmbridge Road referred to as Nanhurst Crossroads (4 arm signalised staggered junction); and
- A281/Loxwood Road referred to as Alfold Crossways (priority junction).

The model then assesses the impact of the proposed development, with mitigation, against travel times between Shalford and Alfold Crossways. In addition to the A281 corridor, northern and western routes to and from Dunsfold Park have been considered. The impact on other locations have been considered using individual junction modelling in addition to the targeted Paramics model.

Indicative means of access

The TA sets out that by reason of the site's location, the primary access is indicated as being provided to the A281 via the new link road and roundabout

junction. As a result, the development traffic will be focussed towards the A281 corridor.

Secondary access will continue to be provided via the existing Compasses Bridge route via Alfold Crossways. Emergency vehicles will also be permitted to use this route. However, it should be noted that freight and HGV traffic will not be permitted to use this access.

Stovolds Hill will be open to bus services, emergency vehicles, cyclists and pedestrians only. It is also anticipated that bus and emergency vehicle access will be available from the Tickner's Heath entrance

### Trip Generation

The applicant's TA sets out the proposed development will, of course, lead to increases in traffic flows on the surrounding highway network. The TA identifies the split in trip rates between the residential and commercial uses of the site. The TA highlights the following combined AM and PM peak traffic movements:

**Table 10.1: Total Person Trips Generated by Development Proposals (AM Peak)**

Land Use/ Journey Purpose	0700-0800			0800-0900			0900-1000		
	In	Out	Tot	In	Out	Tot	In	Out	Tot
Residential to Employment	141	505	646	126	449	575	33	117	150
Residential to Education (Primary)	14	42	57	66	326	392	46	2	49
Residential to Education (Secondary)	14	42	57	66	326	392	46	2	49
Residential to Food Retail	5	15	19	16	50	66	43	132	175
Residential to Non-Food Retail	2	5	6	5	17	22	14	44	58
Residential to Personal Business	6	18	24	13	40	52	13	39	52
Residential to Recreation/ Social	17	52	69	32	97	129	64	192	255
Employment (B1a)	36	6	41	94	11	105	43	14	57
Employment (B1c/B2)	110	47	156	76	20	96	46	36	82
Employment (B8)	14	6	20	18	15	33	19	15	34
School Staff	56	0	56	19	0	19	0	0	0
Care Home	14	8	22	11	11	22	10	5	15
<b>Total</b>	<b>429</b>	<b>745</b>	<b>1,173</b>	<b>543</b>	<b>1,361</b>	<b>1,904</b>	<b>378</b>	<b>599</b>	<b>977</b>

**Table 10.2: Total Person Trips Generated by Development Proposals (PM Peak)**

Land Use/ Journey Purpose	1600-1700			1700-1800			1800-1900		
	In	Out	Tot	In	Out	Tot	In	Out	Tot
Residential to Employment	238	116	354	384	187	571	180	88	267
Residential to Education (Primary)	52	31	83	23	14	37	7	4	12
Residential to Education (Secondary)	52	31	83	23	14	37	7	4	12
Residential to Food Retail	160	88	247	123	68	191	106	58	164
Residential to Non-Food Retail	53	29	82	41	23	64	35	19	55
Residential to Personal Business	72	39	112	69	38	107	46	25	70
Residential to Recreation/ Social	200	110	310	219	120	338	258	141	399
Employment (B1a)	12	71	83	8	72	80	3	17	21
Employment (B1c/B2)	30	110	140	12	61	73	29	37	65
Employment (B8)	16	17	33	12	20	33	7	13	21
School Staff	0	19	19	0	56	56	0	0	0
Care Home	6	10	16	9	14	23	12	10	22
<b>Total</b>	<b>891</b>	<b>670</b>	<b>1,562</b>	<b>922</b>	<b>686</b>	<b>1,608</b>	<b>690</b>	<b>417</b>	<b>1,107</b>

In terms of trip distribution, existing external trips generated by the employment land uses at the site have been distributed onto the local highway network using postcode data, obtained from a travel survey conducted amongst existing employees on Thursday 28th May 2015. Residential and education trip distributions have been informed in accordance with the Census 2011 Origin – Destination data, for the relevant Census output area which covers the application site.

Food retail distribution is assumed to be 50% internal given the on-site food retail unit proposed. Distribution has been made evenly between Cranleigh, Godalming and Horsham given their proximity to the site.

Summary of additional Highway Assessments:

- Technical Note: HGVs associated with Dunsfold Development

This Technical Note provides further information for Stage 2 of the work, related to potential new development at Dunsfold Aerodrome. The note provides a review of the following: potential numbers of Heavy Goods Vehicles (HGVs) that would be generated by the proposed Dunsfold development, both during construction and when completed; routes that could be used by HGVs travelling to/from Dunsfold; historic accident data on these routes.

The proposed Dunsfold development is unlikely to generate significant numbers of HGVs during the normal peak hours of 08:00-09:00 and 17:00-18:00. However, it could generate around 180 HGV movements in total over a typical weekday. It highlights a potential for HGV desire lines to / from the A3



and A283 to the west of Dunsfold. The shortest routes being via both Markwick Lane and the B2130, which are not suitable for HGVs. This has contributed to accidents that have occurred in recent years.

Whilst some measures are already in place, the Note recommends that further measures be introduced to discourage use of these routes. It is considered that the Construction Management Plan would mitigate / control HGV routing during the construction phase.

- Mott MacDonald Transport Assessments – Stages 1 -4

The main requirements of Stage 1 were to:

- Review previous work and associated data inputs and modelling outputs;
- Identify locations where new traffic counts and junction/link assessments are needed in Stage 2 in relation to 1,800 houses at Dunsfold Aerodrome; and
- Develop the methodology for forecasting future traffic demand and for assessing severity of its impact with and without mitigation measures.

The main requirements of Stage 2 were to analyse the potential traffic impacts of new development at Dunsfold Park and Cranleigh to the Local Plan. The A281 and associated junctions were the focus of this work.

New peak period traffic counts were undertaken at relevant junctions in 2015, together with journey time surveys on the section of A281 covering the junctions. The journey times showed that congestion already occurs along the A281 corridor, with significant queuing and delays at the Station Road miniroundabout and Kings Road roundabout.

An improvement to convert the Station Road junction to a signalised layout was previously proposed in the Preliminary Transport Assessment for the Dunsfold development (November 2014) (this is also now proposed as part of the current application). Assessment of this layout shows that it should largely mitigate for the impact of both Dunsfold development trips and additional traffic due to general traffic growth through to 2031.

The Stage 2 Report raises a number of other issues which it has not been possible to assess in detail, for which further work may be required. The Dunsfold Park development is likely to increase traffic levels on lower standard east-west routes, such as High Street Green, Markwick Lane, Alfold Road and Wildwood Lane.

Stage 4 of the work is to contribute to the evidence base that covers wider transport sustainability issues, as set out in the Government's Planning Practice Guidance: "Transport evidence bases in plan making and decision taking".

The Stage 4 work follows Stages 1, 2 and 3, although Stage 3 is not considered relevant to the determination of the current application. Stage 4 concludes on the matters of transport sustainability that Farnham is considered to be the most sustainable location overall for provision of new homes given its current transport options and the potential to address local car trips by transferring them to other modes, followed by Cranleigh and then Dunsfold.

- Mott McDonald – Technical Note

The report highlights the total number of HGVs on each rural road around Dunsfold and importantly captures those that are generated by Dunsfold Park.

The percentage of HGVs compared to total traffic flows does not appear to be excessive (ranges from 2% on Wildwood Lane to 6% on Elmbridge Road and Chiddingfold Road). The National Travel Statistics for 2015 show a proportion of around 1.5% HGVs on rural minor roads.

The proportion of Dunsfold Park related HGV traffic compared with total HGV traffic can be calculated using Tables 3.1 and 3.2:

- A – B2130 Elmbridge Road – 4.8%;
- B – Alfold Road – 13.3%;
- C – Wildwood Lane – 7.4%
- D – B2133 Loxwood Road – 8.4%;
- E – Chiddingfold Road – 4.8%;
- F – Markwick Lane – 0%;
- G – B2130 Godalming Road – 1.8%.

It can be seen from the above that other non-Dunsfold Park HGV traffic makes up the vast majority of HGV traffic on these routes. Therefore although Dunsfold Park contributes to HGV traffic levels, the largest percentage of use associated with Dunsfold on nearby roads is only 13.3%. Even if employment were removed on Dunsfold Park, the HGV levels would not be significantly reduced.

The previous Mott MacDonald work (HGV Note August 2016) predicted the following distribution of HGV traffic and this is compared with the traffic survey results:

<b>Road</b>	<b>HGV Note</b>	<b>Traffic Survey</b>
A281	52%	76%
B2130 North	15%	1%
Markwick Lane West	15%	0%
High Street Green West	5%	2%
Other routes	13%	20%

It can therefore be concluded that Dunsfold Park does not currently have a significant impact on minor roads to the west of the site. However, the report does highlight that 10% of Dunsfold HGV traffic uses, the B2133 Loxwood Road and 7% uses B2130 Elmbridge Road.

- Vision Transport Planning Transport Assessment

The Vision Transport Assessment Review was prepared on behalf of the Joint Parish Councils (Alfold, Bramley, Busbridge, Chiddingfold, Dunsfold, Hambledon, Hascombe, Loxwood, Shalford, Womersley and Rudgwick).

This Assessment Review challenges the Vectos TA as it considers it to be based on inappropriate trip rates and analysis and does not adequately identify likely transport impacts associated with the development proposals. Recommendations are made which suggest that trip rates should be uplifted and an appropriate future baseline scenario used, which is considered to highlight greater impact which could be considered 'severe'. It concludes that in the most basic sense that the development proposals are in the wrong location and cannot be made accessible by the sustainable mitigation measures that are proposed.

#### Highway Safety and Capacity

The County Highway Authority (CHA) has established that a safe and suitable main access into the site is achievable from the A281 by means of a roundabout junction, just south of Fastbridge, and the CHA agrees this in principle.

In addition to the proposed site access road and roundabout, the following measures are offered as highway mitigation within the revised TA:

- A281/Nanhurst Crossroads – junction widening and capacity improvements
- A281/Barrihurst Lane – improvements to right turn facility

- A281/Station Road - signalisation of the existing mini-roundabout (Bramley)
- A281/Kings Road – widening of existing roundabout (Shalford)
- A281/Broadford Road – conversion from priority junction to roundabout (Shalford)

Initial Safety Audit work has been undertaken by the CHA in respect of the proposed junction mitigation schemes and developer responses have been provided in terms of the safety issues raised. The CHA is satisfied that the proposed junction alterations are acceptable in principle and deliverable subject to detailed design and legal agreements, which will be secured through a combination of conditions and the S106 Legal Agreement.

A suite of Traffic Regulation Orders and restrictions for both construction and development traffic will need to be agreed, should permission be granted, in order to minimise the impact of the development upon unsuitable local routes, but also to provide safe and permeable bus, cycle and emergency access. This is to be delivered via a “monitor and manage” fund. Whilst the final details of the legalities and scale of which are yet to be established and agreed, the requirement to secure this will be secured through the Section 106 legal agreement.

The extent of the area of assessment in terms of junction and accident analysis has been extended at the request of the CHA, and has enabled a comprehensive analysis of the A281 corridor, together with some assessment of the wider area.

A Paramics Model has been used to assess the operation and impacts on A281 in the vicinity of the site from Alfold Crossways in the south to Shalford Roundabout in the north. There has been on-going discussion in relation to this modelling work, but the CHA is now satisfied that the totality of mitigation on this corridor provides a safe adequacy of headroom in capacity so that the additional traffic likely to be generated by the development of the site would not lead to the overall worsening of performance of this corridor, i.e. it would not result in greater delays for users in the future.

In addition, there are also 20 separate junction models on the wider network, some of which are showing that there may be a need for mitigation in future. Allowance has been made for this, to the satisfaction of the CHA, in the requirements placed upon the developer through the Section 106.

The impact upon Guildford Gyratory has not been modelled in detail, and this has been accepted due to the unknowns in respect of its future. It is, however

clear from the modelling, that has been completed by the applicants' and subsequently reviewed by the County Highway Authority, on the A281 within the Borough of Guildford, that there will be a material impact on the network into and out of the town, primarily on the A281, and its parallel route, the A3100. As a result of this, a contribution of £5 million towards improvements to the capacity of the Guildford Gyratory has been agreed, also through the Section 106 process, to mitigate those adverse impacts.

- Changes since appeal decision WA/2008/0788

The appeal decision concluded that the site would not be compatible with the existing transportation infrastructure of the area, and would not be sustainable in transportation terms. As such, the appeal concluded that because of the unacceptable impact that the scheme would have on traffic congestion, and its consequent impact on surrounding communities, it was not accepted that this harm would have been outweighed by the advantages of the scheme.

The above position was supported by the Secretary of State, who went on to confirm that the development would put severe and unacceptable pressure on an overstretched road network, in which there is only limited scope for improvement and that the consequences of failure of various improvements, would be severe given the scale of the development.

There is now no concern regarding the highway capacity and safety impacts raised by the CHA, Highways England or West Sussex County Council, subject to mitigation. In addition, a significantly greater amount of modelling work has been carried out by the applicants, as well as the Local Planning Authority in supporting the progress of the emerging Local Plan. It should be noted that the anticipated levels of increase in vehicular movements along the A281, envisaged at the time of the appeal have not materialised.

The CHA is now satisfied that an appropriate package of mitigation can be achieved, to ensure the safe adequacy of headroom in capacity so that the additional traffic likely to be generated by the development of the site, will not lead to the overall worsening of performance of traffic movement along the A281, as discussed above.

The applicants have also agreed to deliver a bus service in perpetuity, including the funding and delivery of a Community Trust to manage its provision. The applicants have also agreed to the provision of dedicated route for cycles to and from Dunsfold and Cranleigh Villages, providing an attractive off road route between the settlements. Taking into account these important enhancements to the mitigation package, it is considered now that the highway improvement works are deliverable.

Further work has also been carried out by Mott McDonald, on behalf of Waverley, to consider the wider impacts of the development on rural communities in terms of HGV movements. The conclusions on this matter are that the development is likely to have a limited impact in this regard, and further mitigation, through a 'manage and monitor' fund, will address any matters that arise as the development is realised.

#### Conclusion on highway capacity and safety matters

In considering the highway position, the key tests are set out in paragraph 32 of the NPPF. In considering these individual tests, it is considered that the proposal accords with these requirements:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;

The proposal provides bus service provision in perpetuity, together with agreement for funding and delivery of a Community Trust to deliver this service. It is accepted that the site's location is limited in providing a choice of sustainable transport modes, however, it is considered that the opportunity for sustainable transport modes have been taken up.

- safe and suitable access to the site can be achieved for all people; and

The CHA has confirmed that a safe and suitable main access into the site is achievable from the A281 by means of a roundabout junction.

- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

The suite of transport infrastructure improvements have been agreed and these are considered to be reasonable in kind and scale to limit any significant impacts of the development on the surrounding highway network. A 'monitor and manage' fund has also been secured to address any unforeseen highway impacts.

Paragraph 32 then goes on to confirm that the development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. The TA and associated review assessments by the highway authorities, have taken into account cumulative impact of the development, against other committed growth within the locality, in particular in Cranleigh.

It is considered that based upon the proposed amended highway improvements as agreed, together with the on-site employment, service and facility provision, the application adequately demonstrates that the proposal would not have a severe impact on the surrounding highway network. The proposal would therefore comply with the requirements of Paragraph 32 of the NPPF.

#### Public Rights of Way and impact on the Wey and Arun Canal

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

Policy LT11 of the Local Plan states that the Council, in consultation with Surrey County Council, will seek to ensure that designated rights of way are safeguarded, protected and enhanced to encourage use by walkers, cyclists and horse riders.

Policy ST1 of the pre-submission Local Plan Part 1 states that the Council will “encourage the provision of new and improved footpaths, bridleways and cycleways, provided there would be no significant effect on SPAs and other areas of importance for nature conservation”.

The NPPF states that access to high quality open spaces including canals and waterways can make an important contribution to the health and well-being of communities. Policy C12 of the Local Plan states that development will not be permitted where it would have a detrimental impact on the visual qualities, setting, amenities, ecological value, heritage interest or water quality of canals and waterways.

The applicant identifies a number of Public Rights of Way that would be within close proximity of the proposed transport works:

- A281/Kings Road – Footpath 269A, 226A and 554 join the A281
- A281/Broadford Road, Footpath 266A joins the A281
- A281/Barrihurst Lane, Bridleway No 203 and Footpath no 203A and Byway 278

The proposed development would open up the existing site to the public using new and existing access points. This would serve to link Public Rights of Way around the site that have been bisected by the aerodrome since the 1940s. The scheme would help to deliver objectives within the Rights of Way

Improvement Plan for Surrey (2011). The proposed new bridge crossing the canal has been designed to allow the BW400 Bridleway to be accommodated in its current position.

The Ramblers Society has commented that this would enable access from Compasses Bridge through to the Public Rights of Way on the northern side of the development which would be positive.

The British Horse Society has raised an objection to the proposal. This raises concern regarding conflicts between road users and horses on the bridleways, particularly adjacent to the proposed access road, and at junctions with roads where traffic would be increased.

The Surrey County Council Rights of Way Officer has raised no objection to the proposed development. However, the officer has advised that the rights of way network will be a key element to improving the sustainability of the proposed development, particularly relating to journeys on foot and bicycle (a point agreed by officers). The existing network cannot achieve this without substantial investment. As a result, the Rights of Way Officer has requested improvements to the following routes/improvements:

- Dunsfold Park (DP) into Cranleigh via Downs Link
- Downs Link – Public Bridleway 566 Cranleigh
- Public Bridleway 282 Dunsfold - Dunsfold Park to Dunsfold Village
- Public Bridleway 400 Alfold
- Public Bridleway 280 Dunsfold
- Localised network improvements
- Edge of carriageway improvements

There are a number of routes proposed within the site by the applicant. The County Council considers that if these were all to become rights of way that the department budget would simply be over burdened in trying to maintain them all. It is suggested that most of these routes should be permitted paths, but in particular the County Council would want to see the following (or routes similar to these) dedicated as Public Bridleways:

- The former route of Benbow Lane (from Alfold Road to High Loxley Road)
- Benbow Rew (From High Loxley Road to Stovolds Hill)
- Stovolds Hill (from Stovolds Hill to Three Compasses Lane)
- A southern perimeter link from Three Compasses Lane to Benbow Lane.

This would include a new equestrian bridge (subject to SCC design) over the Wey & Arun Canal joining with a new spur of bridleway to truncate with Dunsfold Road at a point approximately midway between Springbok Farm entrance and Ticknersheath bridge.



The detailed design of the new bridge, and the intersection of public bridleways with the access road, would be a matter for further consideration at the reserved matters stage, and would be subject to consultation with the British Horse Society and also the County Rights of Way Officer, who has a duty to consider the impact on all bridleway users. It is noted that there are a number of improvements to public bridleways which have been negotiated during the course of the application. These improvements would benefit all users of the bridleway. As such, it is considered that the comments of the British Horse Society would be addressed through the planned infrastructure improvements, and would also be matters for consideration at the reserved matters stage.

Surrey County Council recommends that the provision and dedication of the new rights of way should be secured by way of a legal agreement, and should be made up to a standard acceptable to the County Council, including a minimum width of 4metres.

The Wey & Arun Canal Trust has made no comment on the principle of the development but has commented that the masterplan and landscape strategy are consistent with the Trust's objectives to bring the Canal through Surrey to full restoration as a "green corridor" for navigation, recreation, public access and ecological diversity. The Trust has advised that the current masterplan could result in some maintenance issues and has requested direct consultation with the applicants regarding the detailed design proposals of the bridge. Importantly, officers note that the Trust raises no objection to the principle of the new bridge over the canal.

Officers consider that the improvements sought by the County Council could be reasonably secured by way of legal agreement. This is commented on further within the Planning Infrastructure Contributions Section of this report). Furthermore, officers agree with the County Council that a legal agreement would be the most appropriate means of securing the provision and dedication of the new public rights of way within the site. It is concluded that with the appropriate improvements, together with the new rights of way within the site, connectivity of the rights of way network could be significant improved. Furthermore, the delivery of new, and improvements to existing, rights of way, would improve the sustainability credentials of the application.

#### Housing land supply

The provision of new market and affordable housing will assist in addressing the Council's housing land supply requirements. The Waverley Local Plan the latest evidence of housing need in the Strategic Housing Market Assessment

(SHMA) 2015 is the starting point for considering the amount of housing that the Council is required to supply. The West Surrey Strategic Housing Market Assessment December 2015 indicates that 519 dwellings are needed per annum.

The Pre-submission Local Plan Part 1 2016 and the Spatial Strategy for the Borough seek to meet the objectively assessed need of 519 dwellings per annum in full from the base date of 2013.

The Council has published an updated five year housing supply position statement, dated 01/07/2016. The Statement sets out the housing requirement for the next five years based on West Surrey SHMA figures and various components of housing supply that the Council expects to come forward in that period. The figure identified with the SHMA of 519 dwellings needed per annum, does not deal with the shortfall in supply of 874 dwellings between 01/04/2013 – 30/06/2016. However, the Council's current 5 year housing supply does take account of the backlog and demonstrates that the Council can deliver the 519 dwellings per annum, as well as the 874 dwellings shortfall within the 5 year assessment.

As it stands, the Council is able to demonstrate a supply of housing of 5.3 years worth of the housing requirement. Therefore, the Council can currently demonstrate in excess of the requirements of paragraph 47 of the NPPF. This updated position constitutes a materially changed position. The improved 5 year supply position in comparison with the previous statement of 01/04/2016 resulted from a re-evaluation following publication of the Local Plan in August 2016 and the related inclusion of proposed allocated strategic sites in the plan including the Dunsfold application site.

The current application site forms an allocated site within the Pre-Submission Local Plan Part 1, and if permitted, would contribute, in part, towards the Council's 5 year housing land supply – the applicants have indicated that 332 homes would be provided in the first five years. Notwithstanding the applicant's position, the Council's own assessments identifies the delivery of 130 homes within the 5 year period.

Therefore, in the event that the current application is found to be unacceptable in principle, this could undermine the Council's ability to provide a 5 year land supply and in terms of its longer term provision of housing. This could also mean that the Council would need to revert to attributing limited weight to housing supply policies in the adopted Local Plan, pursuant to paragraphs 49 & 14 of the NPPF which trigger the presumption in favour of sustainable development. Such policies would include Policy C2 (Countryside beyond the Green Belt) which covers the current application site.

In summary, it is a material benefit that the proposal would make a key contribution to the Council's five year land supply. The applicants say this would be 322 homes; the Council's 5 year supply statement July 2016 provides a more conservative estimate of 130. Nevertheless, this is a reasonable contribution to the Council's housing delivery.

### Housing mix

The NPPF states that in order to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends; identify the size, type, tenure and range of housing that are required in particular locations, reflecting local demand; and where it is identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution can be robustly justified.

Policy H4 of the Waverley Borough Local Plan 2002, in respect of housing mix, is considered to be broadly consistent with the approach in the NPPF. It outlines the Council's requirements for mix as follows:

- a) at least 50% of all the dwelling units within the proposal shall be 2 bedroomed or less; and,
- b) not less than 80% of all the dwelling units within the proposal shall be 3 bedroomed or less; and,
- c) no more than 20% of all the dwelling units in any proposal shall exceed 165 square metres in total gross floor area measured externally, excluding garaging.

Policy AHN3 of the Pre-submission Local Plan Part 1 states the proposals will be required to make provision for an appropriate range of different types and sizes of housing to meet the needs of the community, reflecting the most up to date evidence in the West Surrey Strategic Housing Market Assessment (SHMA).

The SHMA 2015 provides an updated likely profile of household types within Waverley. The evidence in the SHMA is more up to date than the Local Plan; as such, limited weight should be attached to Policy H4.

However, the profile of households requiring market housing, demonstrated in the SHMA at Borough level, is broadly in line with the specific requirements of Policy H4 of the Waverley Borough Local Plan 2002.

The housing requirement is set out within Policy ALH1. These requirements are based on the West Surrey SHMA figures. The weight to be attached to this emerging policy is dependent on the strength of any unresolved objections to those policies. It is noted that some individuals, developers and Parish Councils who have raised objection to the Local Plan Policy ALH1 through the Local Plan consultation, challenging whether these are based on correct and the most accurate figures.

A report reviewing the SHMA based on 2016 population projections was undertaken and appended to responses on this planning application. This report suggests that the OAN should be 400 +/-30. The parishes have suggested the SHMA, upon which the policy is based, is unsound.

As a result, the Council's consultants, GL Hearn undertook a review of these representations. The Council is very concerned to ensure that its evidence on matters such as this is robust given that it is likely to be one of the issues that the Inspector will examine quite closely in the forthcoming Local Plan Examination.

As a result of this review, officers are satisfied that the GL Hearn work is robust and a sound basis for planning. In particular, it took account of the most up-to-date information available at the time, using the 2012-based projections that were published in February 2015.

The Neil McDonald review that was submitted to the Council in September 2016 had the opportunity to use the 2014-based projections that were published in July 2016. Although these 2014-based projections are the latest population projections available now, they were not available for the SHMA to use them and when the Council agreed to publish the Local Plan for consultation in August this year.

National Planning Practice Guidance clearly states that official projections are statistically robust and are based on nationally consistent assumptions. GL Hearn state that the rationale in the Neil McDonald review for moving away from the official projections at the time of the SHMA is not clearly justified.

Officers consider that the objections raised in respect of ALH1 could be defended and resolved, for the reasons set out above. Notwithstanding this, the objections, and the Council's response to them, have yet to be tested or considered by an Inspector. As such, at this stage the objections should be considered unresolved, and therefore limited weight should be attached to this Policy.

The Council's Consultants GL Hearn, who produced the SHMA, consider that the approach in the West Surrey SHMA is one that reflects the NPPF and NPPG and remains a sound basis for planning.

The West Surrey SHMA provides the following information with regard to the indicative requirements for different dwelling sizes in respect of market housing:

Unit type	1 Bed	2 Bed	3 Bed	4+ Bed
SHMA requirement	10 %	30%	40%	20%
Indicative housing mix	119 (9%)	360 (29%)	428 (34%)	353 (28%)

The indicative housing mix submitted is broadly in line with the SHMA in terms of the proportion of 1 and 2 bedroom dwellings proposed. There is a slight over provision of 4 + bedroom dwellings at the expense of the proportion of 3 bedroom dwellings. It is accepted on this site that a high proportion of flats on site would not be characteristic of the Surrey Vernacular and would therefore not be appropriate. However, as 3 bedroom dwellings would be likely to take the form of family sized dwellings, this would not provide justification for over providing larger dwellings (4+ bedrooms) at the expense of 3 bedroom dwellings. That said, a discrepancy of 8% is relatively modest. As such, whilst the applicant is encouraged to provide a housing mix that better reflects the requirements of the SHMA at the reserved matters stage, namely an increase in the number of 3 bedroom dwellings. Having regard to the modest discrepancy and the indicative nature of the proposed mix, an objection on housing mix grounds could not be substantiated at this stage.

Officers are satisfied that, notwithstanding the indicative mix submitted, an acceptable housing mix could be achieved on site.

#### Affordable housing

Paragraph 50 of the NPPF states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, and should identify the size, type, tenure and range of housing that are required in particular locations, reflecting local demand.

The NPPF outlines that to deliver a wide choice of quality homes, local planning authorities should identify where affordable housing is needed and identify policies for meeting this on site, unless off-site provision or a financial contribution can be robustly justified.

The adopted Local Plan 2002 is silent with regard to the delivery of affordable dwellings in locations such as this. Specifically, there is no threshold or percentage requirement in the Local Plan for affordable housing on sites outside of settlements. This is because, within an area of restraint, outside of the defined developed areas and settlement boundary, housing development under the current Local Plan is unacceptable in principle, including affordable housing. If, however, the Council were to accept the principle of housing development on this site, in the interest of creating a balanced and mixed community and meeting the identified need for affordable housing in the Borough, the provision of affordable housing would be required as part of the proposals. It would be for the developer to satisfy the Council that the benefits of supporting housing within otherwise constrained location, would outweigh the harm, and that arguably includes the provision of affordable housing.

In other words, the provision of a significant level of affordable housing could be regarded as a benefit of considerable weight which would need to be evaluated when considering whether to make an exception to planning policy.

Policy AHN1 of the Pre-submission Local Plan Part 1 states “Unless specified elsewhere, the Council will require a minimum provision of 30% affordable housing on all housing developments (where the net number of dwellings is 11 or more)”.

There is a considerable need for affordable housing across the Borough and securing more affordable homes is a key corporate priority within the Waverley Borough Corporate Plan 2016-2019. As a strategic housing authority, the Council has a role in promoting the development of additional affordable homes to meet local housing need, particularly as land supply for development is limited. Planning mechanisms are an essential part of the Council’s strategy of meeting local housing needs.

The West Surrey SHMA 2015 indicates a high need for affordable housing in Waverley, with an additional 314 additional affordable homes required per annum. New affordable homes are needed for a broad spectrum of households in Waverley, including people struggling to get on the housing ladder and family homes, as proposed on this site.

The SHMA (2015) provides the following information with regard to the indicative requirements for different dwelling size affordable units:

Unit type	1 bed	2 bed	3 bed	4+ bed
Affordable	40%	30%	25%	5%

The SHMA (2015) also recommends that 30% of new affordable homes should be intermediate tenures and 70% should be for rent. The applicants have presented an indicative proposal of a 50: 50 tenure split between shared ownership and affordable rent. The indicative mix presented is set out below:

	Affordable Rented		Affordable Shared Ownership	
	Units	%	Units	%
<b>1 bed</b>	33	12.5	27	10
<b>2 bed</b>	122	45	148	55
<b>3 bed</b>	108	40	95	35
<b>4 bed</b>	7	2.5	0	0
	<b>270</b>	<b>100</b>	<b>270</b>	<b>100</b>

The applicants have put forward a provision of 30% of the homes to be provided as affordable homes, which would comply with the requirements set out draft Policy AHN1. The proposal's compliance with Policy AHN1 of the Pre-submission Local Plan Part 1 is a material consideration of some weight to be taken into account in the assessment.

Affordable housing is a key corporate priority under the Corporate Plan 2016 for the Council and officers consider that significant weight should be attached to the level of affordable housing provision within the current scheme. Officers conclude that, overall, subject to an appropriate mechanism in the S106 to secure agreement for affordable housing provision for each phase, the proposal would satisfactorily contribute to meeting local needs in line with guidance contained within the NPPF.

#### Proposed care accommodation

The outline element of the scheme seeks permission for up to 7,500 sqm use Class C2 (describe use) as part of the proposed settlement.

Paragraph 50 of the NPPF 2012 states that Local Planning Authorities should seek to create sustainable, inclusive and mixed communities, by planning for a mix of housing based current and future demographic trends. This includes planning for older people.

Policy H7 of the Waverley Borough Local Plan 2002 states that proposals for supported housing for those with special needs will be encouraged, subject to other Plan policies.

According to the Council's 2014 Older Persons Housing Needs Survey, the 65+ age group was 20.4% of the total Waverley population in 2011 and this will grow to 24.8% in 2027 and to 28.6% in 2037. The 65+ age group is forecast to increase by 15,600 people (+62.6%). This additional growth is 80% of total Borough population change to 2037. Within the older age groups, numbers of those aged 75+ are projected to grow by 11,600 (95.9%) and those 85+ by 6,800 (170%). Therefore, both currently and over the next two decades there is a need to prioritise the increased supply of housing suitable for older people as the size of the older population increases substantially. The Survey highlights that the highest demand is for sheltered and extra care housing.

The applicant has estimated that this would equate to approximately 75 extra care units. Their justification for the care facility is that "these will provide high quality accommodation delivering care to the elderly in an environment that enable them to live independently for longer. This will also free up more housing in the Borough as residents move into the care accommodation."

There has not been any objection from any consultees in relation to the proposed care unit.

Extra care housing is highlighted as being in demand by the 2014 Older Persons Housing Needs Survey. Officers would encourage the application to put forward a nomination protocol with Surrey County Council to prioritise local people with a need for specialist care, should this come forward the offer of care accommodation would be attributed greater weight as a benefit to the scheme. The tenure type is only indicative at this stage; as such limited benefit can be attributed to the applicant's offer of extra care housing. This would be a matter for further consideration at the reserved matters stage.

Officers also consider that the proposed care facility contributes to the creation of a self-contained settlement. The use is considered to be compatible with the wider mixed use development proposed.

Officers therefore conclude that the principle of the proposed care home, as part of the mixed use development, would be acceptable. Should permission be granted, a condition would be imposed to secure full details of the proposed tenure, type and management of the care home prior to, or in conjunction with the reserved matters application.



### Custom / Self build requirement

The Housing and Planning Act 2016 sets out at section 10, an amendment to the Self-build and Custom Housebuilding Act 2015. This sets a Duty to Grant planning permission to meet the Borough's demand for self-building and custom housebuilding. This requires local authorities to grant sufficient suitable "development permissions" on serviced plots of land to meet the demand for self-build and custom housebuilding in their area. Demand in this context means the number of people on the local authority's Register.

In the Act, 'self-build and custom housebuilding' means the building or completion by:

- (a) individuals,
- (b) associations of individuals, or
- (c) persons working with or for individuals or associations of individuals,

of houses to be occupied as homes by those individuals.

The proposal does not include a detailed mix for either affordable or market housing, as this is to be agreed at each phase or sub-phase of the development. An indicative mix is identified to meet the Council's needs. Agreement to secure an appropriate mix of housing for each phase is to be secured through the Section 106 agreement, to meet the housing needs at the time. In addition, there is nothing within the outline scheme which would preclude the delivery of self-build or custom build homes.

### Design / Layout

Paragraph 56 of the NPPF 2012 states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development.

Paragraph 58 of the NPPF 2012 sets out that planning policies and decisions should aim to ensure that developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Establish a strong sense of place, using streetscapes to create attractive and comfortable places to live, work and visit;

- Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks;
- Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- Create safe and accessible environments;
- Are visually attractive as a result of good architecture and appropriate landscaping.

Paragraph 60 of the NPPF 2012 states that it is proper for development to seek to promote or reinforce local distinctiveness. Paragraph 63 states that great weight should be given to outstanding or innovative designs which help raise the standard of design more general in the area.

Paragraph 64 of the NPPF 2012 states that permission should be refused for development of poor design that fails to take opportunities available for improving the character and quality of an area and the way it functions.

Paragraph 65 of the NPPF 2012 states that local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape.

Policy D1 of the Local Plan 2002 accords with the NPPF in stating that development would not be permitted where it would result in material detriment to the environment.

Policy D4 of the Local Plan 2002 accords with the NPPF in requiring development to be of a high quality design which integrates well with the site and complements its surroundings.

Policy TD1 of the Pre-submission Local Plan Part 1 2016 echoes the requirements of Policies D1 and D4 of the Waverley Borough Local Plan 2002. New development is required to be of a high quality and inclusive in design to respond to the distinctive local character of the area. Development should be designed so it creates safe and attractive environments, whilst maximising opportunities to improve the quality of life, health and well-being of current and future residents.

The site is located within the area covered by the Dunsfold Village Design Statement. This was adopted as a material consideration by the Council on 24<sup>th</sup> April 2001. Whilst the size and scale of the proposal suggest that the

design approach should be developed within a broader guidance framework than the Village Design Statement, this document is nevertheless important and material to the assessment of the new settlement which should be designed in such way to be appropriate to the surrounding area. The Village Design Statement advises that development should:

- Preserve the feeling of space and rural views that are key characteristics of the village
- Use traditional local materials where feasible consistent with existing or adjacent structures
- Ensure that boundary walls and fences are of a height and construction using traditional materials to harmonise with their surroundings, and to avoid obscuring the feeling of space
- Avoid the inappropriate use of urbanising features on roadways

The application is an outline application, with all matters reserved including the appearance, scale and layout. Illustrative layout plans and a Design and Access Statement have been submitted. The layout and design would be the subject of further review and consideration as part of any reserved matters application. Nonetheless, officers have considered the potential of the site to achieve a high quality development, as well as assessing the indicative layout submitted.

The proposed layout has clear zones with the Business Park to the north, residential areas to the south and with the two schools and 'Runway Park' acting as a buffer in between. The village centre is envisaged as a pedestrianised area with residents driving into decked parking barns before proceeding to their houses and apartments on foot. The village centre and outer neighbourhoods are separated by the formal semi circular avenue of the Brook, and the outer neighbourhoods would be laid out in four petals extending into the landscape. The Woods, on the south west side of the development, would comprise a small area of detached houses in generous grounds.

With the support of officers, the applicants have commissioned a review from Design: South East (DSE) – this is a panel of independent architects that provides professional advice on design quality. The overriding conclusion is that officers consider the proposal to have high potential in terms of the quality of architecture, urban design and commitment to sustainability and innovation. It is noted that the applicant is committed to achieving the BRE Home Quality Mark and the Passivhaus standard. DSE commends the ambition and innovation of the scheme, in particular the village centre design which includes the use of parking barns.

Notwithstanding these positive comments, the DSE, along with officers' own assessment, has identified areas which require further attention and consideration at the reserved matters stage.

The connectivity of the site, with a singular main access point does not necessarily reflect what one might expect of a village that has evolved over time – a convergence of 4 lanes; neither does it reflect the historic connectivity of the site. The access points require some further consideration to provide separation between proposed residential areas and the (likely large number of) Heavy Goods Vehicles accessing the business/commercial uses.

The Runway Park has the potential to create a strong and unique reminder to the heritage of this site with more focus on emphasising the linearity of the runway. In addition, more of the existing site features could be retained, as it only partially incorporates some of the legacy features of the airfield – i.e., the existing triangle and perimeter road could be a stronger design concept.

The retail and community heart of the proposal is large in scale and somewhat fragmented for a village of the proposed size of the settlement and the distances involved. There is also further potential for better integration of the proposed uses rather than the rigid zoning approach currently shown. Notwithstanding the innovative nature of the village centre, which is commended, the quality of the buildings and public spaces would need to be sufficient for residents to accept the less convenient parking arrangements (similar to in the centre of historic towns).

Officers are satisfied that there is sufficient scope and potential to achieve a high quality design with a high quality of architecture, urban design and a commitment to sustainability and innovation. This conclusion is illustrated by the indicative layout and Design and Access Statement, and endorsed by the comments of the panel (Design South East). It is clear that a not insignificant amount of work would be required at/in advance of, the reserved matters stage. Officers would, in particular look to secure at the reserved matters stage an agreed fully worked up masterplan for the whole site, a flexible phasing plan with the ability to respond to the master plan and design principles and parameter plans agreed.

Officers therefore recommend that, if outline approval is granted, this is subject to appropriate conditions to secure the following:

- Production of a fully worked up masterplan to be subject of a further design review, design principles and parameter plans (density, scale, car parking, etc.) for the entire site, as well as detailed matters for Phase 1;
- A flexible phasing plan that will respond to any amended masterplan.

- Process for design review and on site review at set times throughout the process – per phase. This also needs to reflect the potential changing nature of the masterplan

Subject to conditions, officers are satisfied that, at this outline stage, the proposal would comply with the relevant Local Plan, emerging plan and NPPF policies and guidance in respect of design and layout.

#### Impact on residential amenity and compatibility of uses

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

The application is in outline form only; however an indicative site layout plan has been submitted. This shows a range of densities on site, with the majority of the dwellings to be provided at densities of 5-65dph. The indicative details show a large amount of space and scope for intervening landscaping. It is noted that open space and a country park would be provided on the western side of the site providing an extensive distance between the housing and neighbouring dwellings to the south west end of the site.

The nearest existing residential properties to the proposed development are at Compasses Bridge to the south east, Fastbridge and Vastbridge Farms on the A281 north of the access road, dwellings along Alfold Road to the south and west, dwellings along Dunsfold Road including Tickner's Heath and Cobdens Farm. In addition, there is an existing dwelling on site to be retained – Primemeads. Alfold is the closest village and lies on the main access road to the development. It is considered that the reserved matters layout and scale details would be able to be designed in such a way as to avoid a materially detrimental impact upon the amenities of neighbouring or existing properties.

The proposed retail and industrial uses are proposed to be located at the northern end of the site, as are the existing business uses. This location is well separated from the nearest residential properties and is considered to be an appropriate location for the industrial uses. The proposed employment uses, where new buildings are proposed, would be sited adjacent to the existing buildings within the well-established industrial estate at Dunsfold Park.

At present, the aerodrome is a noise generating activity from which there are existing impacts on neighbouring dwellings. Historically, there have been concerns with regard to noise levels at Dunsfold Park and their impact upon neighbouring dwellings. However, the noise sources in these cases were found to relate to other uses associated with the airfield and car testing/experience days. These uses would not form part of the current proposal. The proposed uses, primarily residential, are considered to be more compatible with the surrounding area which comprises low density residential dwellings, than the existing aerodrome.

The construction phase of a development of this size inevitably has the potential to cause disruption and inconvenience to nearby occupiers and users of the surrounding highway network over an extended period of time, as well as to existing and future users of the industrial/business uses at Dunsfold Park. The applicant has proposed a phased approach to the development. The proposed indicative timescales for this indicate that the development would be split into 7 phases over approximately 9 years. The proposed road access would be brought forward first. The phasing plan gives careful consideration to the points of access through the construction period, and seeks to minimise conflict between construction traffic and residential/other users of the site. This, in turn, would also minimise impacts on neighbouring occupiers. The detail of the phasing, together with detailed construction management plans, would be the subject of conditions and appropriate legal agreements. As such, having regard to the transient nature of the construction impacts, the phasing measures and the ability to potentially minimise impacts through both legal agreements and conditions, officers are satisfied that these impacts could be appropriately managed and there is no overriding objection on this basis.

In summary, whilst the layout plan is only indicative, given the scope to provide significant amounts of open space intervening the proposed development and surrounding residential dwellings, together with the potential for appropriate measures to limit the impact of the construction process, it is considered that the proposal could be achieved without causing materially detrimental impacts on the amenities of neighbouring occupiers.

#### Standard of accommodation for future occupiers

Paragraph 17 of the NPPF seeks a high standard of design for future occupiers.

The Government's policy on the setting of technical standards for new dwellings is set out in the Ministerial Statement of 25<sup>th</sup> March 2015. This statement should be taken into account in applying the NPPF and in

particular, the policies on local standards or requirements at paragraphs 95, 174 and 177. New homes need to be high quality, accessible and sustainable. The Building Regulations cover new additional optional standards on water and access. A new national space standard has been introduced to be assessed through the planning system. The optional new national standards should only be required through any new Local Plan policies, if they address a clearly evidenced need and where their impact on viability has been considered.

Policy TD1 of the Pre-submission Local Plan Part 1 refers to maximising opportunities to improve the quality of life and health and well being of current and future residents. Such opportunities include, inter alia, appropriate internal space standards for new dwellings.

As the application is in outline form only, no information has been submitted with the current application regarding the floorspace of the proposed dwellings. This would be a matter to consider at the reserved matters stage should outline permission be granted. However, officers are satisfied that a high standard of accommodation could be achieved on the site.

#### Provision of amenity space, play space and sports facilities

On promoting healthy communities, the NPPF sets out that planning policies and decisions should aim to achieve places which promote safe and accessible developments, with high quality public spaces which encourage the active and continual use of public areas. These should include high quality open spaces and opportunities for sport and recreation which can make an important contribution to the health and well-being of communities.

Paragraph 17 of the NPPF 2012 states that planning should take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

Paragraph 70 of the NPPF 2012 supports this by stating that planning policies and decisions should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Policy TD1 of the Pre-submission Local Plan Part 1 refers to maximising opportunities to improve the quality of life and health and well being of current and future residents. Such opportunities include, inter alia, the provision of private, communal and public amenity space and on site play space provision (for all ages).

Standards for the provision of sports facilities are set out within the Fields in Trust Guidance for Outdoor Sport and Play 'Beyond the Six Acre Standard' 2016, the Council's Playing Pitch Strategy (2012-2028) and the Council's PPG17 Open Space, Sport and Recreation Study (2012).

- Equipped/designated play areas

The Fields in Trust |Guidance suggests the provision of the following amount of equipped/designated play areas for the development:

Fields in Trust Standard (per hectare provision per 1000 population)	Total requirement for the proposal (ha)
0.25	1.08

The guidance indicates that this requirement should include the following types of equipped/designated play areas:

- A Local Area of Play (LAP) - a play area equipped mainly for children aged between 4-6 years old. LAPs should be located within 100m from every dwelling. The main activity area should be a minimum of 100 sqm with a 5m minimum separation between the activity zone and the boundary of the dwellings.
- A Local Equipped Area of Play (LEAP) - a play area equipped mainly for children age between 4-8 years old. LEAPs should be located within 400m from every dwelling. The main activity area should be a minimum of 400 sqm with a 20m minimum separation between the activity zone and the boundary of the dwellings.
- A Neighbourhood Equipped Area of Play (NEAP) - a play area equipped mainly for older children. NEAPs should be located within 1,000m from every dwelling. The main activity area should be a minimum of 31.6m by 31.6m with a minimum activity zone of 1,000 sqm, with a 30m minimum separation between activity zone and the boundary of the dwellings.

The Design & Access Statement sets out the proposed provision in respect of open space, and play areas. The total open space on site is expected to be 134ha. This states that play areas to be provided would comprise:

- 2 x Neighbourhood Equipped Areas of Play (NEAPs) (2,000 sqm)
- 4 x Local Equipped Areas of Play (LEAPs) (1,600 sqm)
- 23 x Local Areas of Play (LAPs) (2,300 sqm)



Based on the minimum size requirements for each of the above, the amount of equipped/designated play areas would total 5,900 sqm or 0.59ha. This significantly exceeds the minimum play requirement of 0.45ha.

- Outdoor sports provision including playing pitches

Policy LT7 of the Local Plan states that outside settlements, proposals for new leisure or tourism related development or the extension of new facilities will only be permitted providing that:-

- a) it is of a nature, scale, design and character suited to its proposed location;
- b) the proposed activities do not harm the character of the countryside and amenities of the area;
- c) the natural environment and nature conservation interests are safeguarded;
- d) suitable existing buildings are utilised whenever practical;
- e) access and parking can be provided to a satisfactory standard and the amount of traffic likely to be generated by the proposal would not prejudice highway safety or cause significant harm to the environmental character of country roads; and
- f) car parking areas can be landscaped and discreetly located without causing significant harm to the rural character of the area.

Having regard to the number of residential dwellings proposed, the development would generate additional demand for sports provision. Existing facilities within the area would be unable to meet the increased demand without exacerbating existing and or resulting in future deficiencies. As a result, the applicants are proposing to provide a range of outdoor sports facilities on site to meet the projected demand.

The applicant contends that the on site provision would be required to meet the demand from the development in full and therefore contends that no off-site contributions would be required in respect of outdoor sports.

Taking into account the expert advice of Sport England, officers consider that the new development should contribute towards meeting that demand through a combination of new on site infrastructure, together with contributions towards improvements at existing off site facilities.

The Design and Access Statement indicates that the following would be provided:

- 2 x Junior football pitches and outfields
- 2 x Senior football pitches
- 1 x cricket wicket and outfield

- Approximately 3.3ha of informal games space
- 5-a-side football pitches
- Tennis courts
- Multi-use games area

The applicants have provided an illustrative landscape master plan and a design principles diagram. These are indicative only but provide one example as to how the sports provision could be provided, and set out. The scale and locations of the proposed development have regard to a projected estimated population of 4,268. The development would exceed the requirement of 1.6ha of outdoor sports facilities per 1000 population standard. There is also a requirement for 1.2ha per 1000 population.

Sport England has raised no objection to the proposed outdoor sport provision subject to the inclusion of a number of conditions; these include requiring that all sports provision should be delivered during the first three development phases.

At this stage, the type and detail of the sports provision are indicative. As such, the level and type of sports provision would be a matter for consideration at the reserved matters stage; this would include consultation with both Sport England and the Council's Leisure Service. The applicant has also been requested to contribute towards wider leisure infrastructure by way of an off site contribution – more detail on this is provided within the Infrastructure Section of the report.

- Informal Outdoor Space (Parks and Gardens, Amenity Green Space, Natural and Semi Natural)

The Fields in Trust Guidelines for the provision of informal open space is as follows:

	Fields in Trust Standard (per hectare provision per 1000 population)	Total requirement for the proposal
Parks and Gardens	0.8	1.44
Amenity Green Space	0.6	1.08
Natural and Semi Natural	1.8	3.24
		<b>Total 5.76ha</b>

The indicative masterplan estimates the provision of over 134 hectares of open space, well in excess of the Fields in Trust standards. The Design and

Access Statement indicates that this would include a Country Park, Runway Park and other areas of open space dispersed through the development which would include Green Corridors/Verges and Formal Gardens. This area would also include some of the formal play area and sports provision as referenced above.

The Council's Parks & Countryside team has commented that the final masterplan should include the provision of green corridors as proposed and some more formal areas of gardens. Their response also highlights the need for careful selection of trees, shrubs, climbers and herbaceous borders mixed with hard landscaped surfaces and structures. The Country Park should accommodate a variety of different landscaped area and habitats and could include a bike park area (dirt trails/jumps etc).

The Council's Parks & Countryside Team would be consulted as part of any subsequent pre application advice as well as any subsequent reserved matters application.

- Private amenity space

Policy H10 of the adopted Local Plan 2002 addresses amenity and play space in housing developments. Although there are no set standards for garden sizes, the policy requires that a usable 'outdoor area' should be provided in association with residential development and that 'appropriate provision for children's play' is required. For developments of flats or maisonettes, Policy H10 sets out that outdoor space may be for communal use rather than as private gardens.

Only indicative details are proposed in respect of the proposed layout. These do not provide detail on the level of private amenity space to be provided for each dwelling. This matter will appropriately be assessed at the reserved matters stage. Nonetheless, officers consider that the size of the site relative to the quantum of development proposed would allow for appropriate provision of private amenity space.

The layout and details of the open space, sports facilities and recreational areas are indicative. The indicative layout demonstrates how this provision could be made and Officers are satisfied that such a level of provision can be provided alongside the proposed housing development and associated access. Whilst a matter for consideration at the reserved matters stage, this could be a significant benefit to the development. As a minimum, Officers are satisfied that the outline application has demonstrated that an appropriate level of open space, sports facilities and recreational areas could be achieved.

## Biodiversity and compliance with Habitat Regulations 2010

The NPPF states that the Planning System should contribute to and enhance the natural and local environment by minimising impacts upon biodiversity and providing net gains in biodiversity where possible. Distinctions should be made between the hierarchy of international, national and locally designated sites. Policy C10 of the Local Plan states that development within or affecting designated sites will not be permitted unless it can be demonstrated that it would not conflict with nature conservation interests.

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

If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for then planning permission should be refused.

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

Policy NE1 of the Pre-submission Local Plan Part 1 states that the Council will seek to conserve and enhance biodiversity within Waverley. Development should retain, protect and enhance features of biodiversity and geological interest and ensure appropriate management of those features. Adverse impacts should be avoided or, if unavoidable, appropriately mitigated.

The National Environment and Rural Communities Act 2006 states that the Council as local planning authority has a legal duty of care to protect biodiversity.

Habitats within the application site are diverse and include some species rich examples. There are 3 internationally designated sites located between 7-10 km from the site. These include the Thursley, Hankley & Frensham Commons Special Protection Area (Wealden Heaths Phase 1). In addition, there are 13 national or locally designated sites within a 1 km radius; these include Sites of Nature Conservation Importance (SNCIs) Ancient Semi-Natural Woodland and the Chiddingfold Forest Site of Special Scientific Interest (SSSI).

The application is accompanied by habitat and vegetation surveys, and reports covering the impacts on the following species:

- Badgers

- Bats
- Dormice
- Breeding birds
- Amphibians
- Reptiles
- Invertebrates

The development would represent a significant increase in human (domestic) 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 effect on wildlife.

The applicant considers that the application site provides a significant opportunity to substantially enhance the site's ecological value. The landscape parameter plan retains existing woodlands and tree groups including along the Wey and Arun Canal. The site also includes significant areas of open space with the potential for habitat mitigation. Where appropriate, mitigation and enhancement measures are proposed in respect of protected species.

No objections have been raised by the relevant consultees – Surrey Wildlife Trust (SWT) and Natural England, in respect of ecological impacts. SWT advises “the majority of the development would mostly avoid impacting important habitats such as those listed in Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as Habitat of Principal Importance to Conservation. However, SWT has also highlighted the need to condition further survey work and make further recommendations which the application should implement. The following sections consider in more depth the impacts on particular habitats/protected species:

- Chiddingfold Forest Site of Special Scientific Interest (SSSI)

The applicants do not propose any specific mitigation in respect of the SSSI. However, on site mitigation such as the provision of onsite landscaping, creation of new habitats and enhanced boundary treatments would minimise impacts on this feature.

No objection is raised from key consultees regarding direct impacts on the SSSI. Natural England has commented “This application is in close proximity to the Chiddingfold Forest Site of Special Scientific Interest. Having reviewed the application, Natural England is satisfied that there is not likely to be an adverse effect on this site as a result of the proposal being carried out in strict accordance with the details of the application as submitted.” Similarly, Surrey

Wildlife Trust raises no objection in this regard, however notes the potential to impact on rarer bat species that have been recorded on site with some habitat connectivity between the site and Chiddingfold Forest.

The impact on bats is considered separately below. Officers are satisfied that there would be no likely adverse impacts on the ecology of the SSSI.

- Bats

The applicant states that Pipistrelle bats have been found on and near to the site, including at Broadmeads Cottage and Primemeads Farmhouse. It is considered that roosts on site represent low status roosts. The large areas of open grassland on site are considered by the applicant to provide poor habitat for bats. However, the wooded and canal areas on site are of higher value. The submitted surveys consider potential impacts on rarer bat species: Bechstein and Barbastelle. These have been recorded on site where Bechstein roosts have been recorded, as well as within the nearby SSSI (Chiddingfold Forest). These species made up a very small portion of the bats recorded on site. Given the low numbers recorded the submitted ecology report considers the site does not provide a high quality habitat for these bats. Nonetheless, bat mitigation measures are proposed.

Natural England highlights the need to consider the particular commuting and foraging requirements of the Bechstein and Barbastelle bats and advises that robust mitigation would be required.

Surrey Wildlife Trust (SWT) has provided comment having regard to an objection raised by Ross Baker of Surrey Bat Group. SWT advises that whilst the applicant's ecologist has acknowledged the importance of these rarer species of bats, the proposed mitigation requires further detail to ensure best chance of conserving and preferably enhancing these bats' status on site. SWT recommends further specialist survey work in order to provide additional detail of bat usage in order to inform a detailed mitigation strategy. SWT recommends that the applicant seeks advice directly from the Surrey Bat Group in order to deliver an optimum Bat Mitigation Strategy should this development proposal proceed further (i.e. to reserved matters stage).

Officers consider that it would be reasonable to require further survey work to inform a detailed mitigation plan by way of condition if outline permission is granted. However, it is considered that sufficient information has been submitted in order for consultees and officers to be satisfied that the proposed development could be achieved without causing adverse harm to protected bats or their roosts.

- Green Infrastructure (GI).

The applicant proposes a number of Green Infrastructure corridors to enhance the site's ecological value.

Natural England notes that the proposed development has the potential to incorporate features into its design that could encourage green links from the site to the wider landscape, as well as buffering the proposed development site against visual impacts. Such features could be achieved through the development and incorporation of effective Green Infrastructure (GI).

Officers consider the provision of Green Infrastructure on site would be key to enhancing the site's ecological value, and would look to secure its provision using a Landscape Ecological Management Plan (LEMP), through condition if outline permission is granted.

- Breeding Birds.

The submitted ecology surveys recognise potential adverse impacts on nesting birds, as much of the site would become unsuitable for nesting. Open space proposed for recreational purposes would not be suitable. The applicant proposes on site mitigation – namely the provision of foraging and nesting opportunities within the Country Park. Off site, the applicants propose on going management of Holdhurst Farm in order to benefit farmland birds and provide ground nesting opportunities.

Surrey Wildlife Trust advises that the site is of 'County Importance' for birds due to the variety of habitats on site and the effect on them from previous uses of the site. SWT emphasises the importance of the conservation and enhancement of habitats, together with good future management. SWT recognises its particular important for rarer species such as Barn Owl, Lesser Spotted Woodpecker, Nightingale and Marsh Tit. The provision of new 'open space' habitat on Holdhurst Farm is likely to be an important element in retaining species which prefer this type of habitat including Skylark, Meadow Pipit and Lapwing.

Officers are satisfied that the impact on birds from the development could be appropriately mitigated through a combination of on and off site mitigation. Further detail on this would be required at or before the reserved matters stage.

The provision of off-site mitigation at Holdhurst Farm could be reasonably secured through the imposition of a pre-commencement condition

- Amphibia and Reptiles

The applicant acknowledges the presence of Great Crested Newts on site, albeit a low population, and has indicated outline mitigation plans.

SWT notes that the Great Crested Newt, a legally protected species, has been found on site, together with four species of reptile which makes it a Key Reptile Site. Whilst outline detail has been provided, SWT advises that full Mitigation Plans should be submitted for consideration by the Local Planning Authority.

Officers are satisfied that through conditions, mitigation could be secured to avoid adverse impacts on this species.

- European Protected Species Licence

The Ecology Surveys submitted with the application indicate that the proposals would involve activities which would affect European Protected Species (Dormice, Bats and Badgers). As such, it is considered that a European Protected Species licence is likely to be required. Natural England is the licensing authority for the purposes of this licensing regime. However, it is incumbent on the Local Planning Authority to assess the likelihood of obtaining the said licence. This assessment is based on the comments of Surrey Wildlife Trust and Natural England.

Given the comments from Surrey Wildlife Trust and Natural England and subject to the imposition of suitable planning conditions to secure where necessary extra survey work, and mitigation, Officers consider that owing to the overriding need for housing at the proposed scale, and the absence of any suitable alternatives to deliver the level of housing provision proposed at this site; that the proposal would contribute to the social and economic needs of the local community; and that subject to the effective implementation of mitigation measures, that the proposed development would meet the Imperative Reasons of Overriding Public Interest test in a licensing context and would, with the effective implementation of mitigation, cause no adverse effect on the conservation status of the protected species concerned. Officers conclude that the proposal would be likely to obtain the requisite licence.

- Conclusions

Having regard to the above comments, including those from consultees, officers consider that sufficient information has been provided such as to meet the requirements of Circular 06/2005. Namely that the information, so far as



possible at this early outline stage, establishes the presence or otherwise of protected species and the extent that they may be affected by the proposed development.

It is clear that there is a requirement for extensive mitigation to avoid adverse impacts from the proposal on protected species. In some cases, mitigation measures would need to be informed by further survey work. However, having regard to the responses from consultees, officers are satisfied that, with mitigation, the proposed quantum of development could be achieved on site without causing harm to protected species or their roosts. The nature of the mitigation, and the impact on protected species, would clearly be partially dependent on the layout and finer detail of the proposal. As such, a further assessment would need to be made at the reserved matters stage, if outline permission is granted.

It is noted that there are significant opportunities for enhancing the biodiversity of the site, and the creation of habitats in addition to that required for mitigation purposes. This would be secured by a condition to require the provision and implementation of a Landscape Ecological Management Plan (LEMP).

#### Flood risk and drainage

Paragraph 100 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at high risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

Paragraph 101 of the NPPF states that the aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

The Strategic Flood Risk Assessment will provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding.

Paragraph 102 states that if, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
- a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Both elements of the test will have to be passed for development to be allocated or permitted.

Paragraph 103 of the NPPF states that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

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

Policy CC4 of the Pre-submission Local Plan Part 1 2016 states that in order to reduce the overall and local risk of flooding, development must be located, designed and laid out to ensure that it is safe; that the risk from flooding is minimised whilst not increasing flood risk elsewhere and that residual risks are safely managed.

In those locations identified as being at risk of flooding, planning permission will only be granted where it can be demonstrated that it is located in the lowest appropriate floor risk location, it would not constrain the natural function of the flood plain and where sequential and exception tests have been undertaken and passed. Sustainable drainage systems (SuDS) will be required on major development proposals.

In a Written Ministerial Statement on the 18<sup>th</sup> December 2014, the Secretary of State for Communities and Local Government set out the Government's expectation that SuDS will be provided in new developments, wherever this is appropriate. Decisions on planning applications relating to major developments should ensure that SuDS for the management of run-off are put in place, unless demonstrated to be inappropriate.

Under these arrangements, Local Planning Authorities should consult the relevant Lead Local Flood Authority (LLFA) on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The SuDS should be designed to ensure that the maintenance and operation requirements are economically proportionate.

The NPPG states that whether SuDS should be considered will depend on the proposed development and its location, for example where there are concerns about flooding. SuDS may not be practicable for some forms of development. New development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of SuDS. When considering major development, SuDS should be provided unless demonstrated to be inappropriate. Whether a SuDS system is appropriate to a particular development proposal is a matter of judgement for the Local Planning Authority and advice should be sought from relevant flood risk management bodies, principally the LLFA.

- Flood Risk

The Environment Agency (EA) 'Flood Map for Rivers and Sea' identifies the majority of the application site to be located within Flood Zone 1. However, part of the site is located within Flood Zones 2 and 3, these being areas at greater risk of flooding. The Flood Zones identified are in close proximity to the Wey and Arun Canal which runs along the eastern boundary of the site, and in part falls within the red edge boundary of the application site.

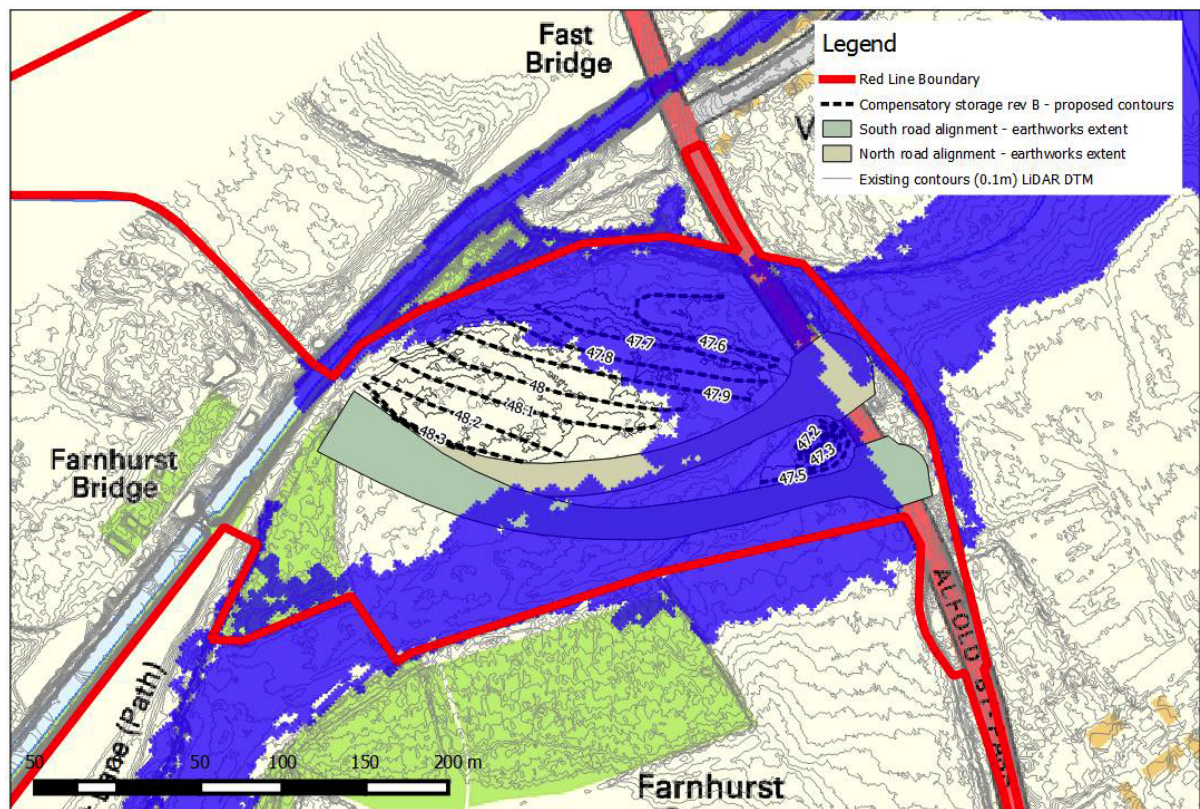
The EA "Risk of Flooding from Surface Water" map indicates that the site has a variable risk of surface water flooding, with areas of the site being at low and high risk of surface water flooding.

In its original form, the EA raised concern regarding the application and the risk of flooding resulting from the proposed development. The Environment Agency considered that the proposal had failed to provide a suitable basis for an assessment to be made of the flood risk arising from the proposed development. In particular, the submitted FRA failed to demonstrate how the direct loss of part of flood plain storage within the 1 in 100 with an appropriate allowance for climate change flood extent caused by the proposed development could be mitigated for. This related to the proposed location for the new access road which crosses the Wey and Arun Canal. The EA

therefore required the applicants to demonstrate that any increase in built form could be compensated for.

Consequently, the applicants have submitted an Addendum to the Flood Risk Assessment to address the objection raised by the EA. Whilst the detailed drainage design remains a reserved matter, the Addendum FRA sets out the following to demonstrate that an appropriate flood compensation area can be provided:

A single potential compensatory storage scheme comprising of minor valley side reprofiling to the north of the potential road alignments, has been developed to demonstrate that it is feasible to provide level for level compensatory storage for both road alignments up to a level of 48.2m AOD. This exceeds the anticipated 1 in 100 yr plus climate flood level, which is 47.81m AOD and demonstrates that there is resilience in this initial assessment should there be minor changes in the extent of the earthworks associated with the road construction or other unforeseen circumstances. The extract included below identifies the location of the proposed flood compensation area.



Flood Compensation Plan (Addendum FRA – Figure 2.5).

The Flood Risk Assessment addendum - compensatory storage, dated

May 2016, prepared by Mott MacDonald has been reviewed by the Environment Agency. Their response dated 28/10/2016 advises that the flood water storage compensation measures could be secured by an appropriate planning condition.

The proposal is therefore considered acceptable in this regard.

- Sequential and exception tests

As part of the site is located within an area of flood risk a Sequential Test must be carried out in accordance with paragraphs 101 and 103 of the NPPF. The applicants have therefore provided information to seek to demonstrate that the sequential test would be passed.

The NPPG states that a Sequential Test does not need to be applied for individual developments on sites which have been allocated in development plans through the Sequential Test (Paragraph: 033 Reference ID: 7-033-20140306). The application is subject to a draft allocation in the Pre-Submission Local Plan Part 1. However, at this stage, the Pre-submission Local Plan Part 1, and the policy allocating Dunsfold as a strategic site (SS7), have not yet been allocated for purposes of an adopted Plan ("The Development Plan"). A sequential test is therefore still required to be carried out.

The draft allocation was subject to a Strategic FRA. The application site is identified as sequentially preferable for development in overall terms, within the pre-submission Local Plan. Furthermore, there are no other potential sites for housing that could deliver development on the scale proposed in an acceptable manner. It is therefore considered that the sequential test is passed.

In respect of the exception text, approximately 98% of the area of the site is located in Flood Zone 1 and all flood vulnerable uses ("highly vulnerable", "more vulnerable" and "less vulnerable" as defined by NPPF) are to be located within the Flood Zone 1 area.

The small area of Flood Zone 2 and 3 (approximately 2% of the area of the Site) is located to the eastern edge of the site close to the A281. An access road linking the development to the A281 and the canal basin would be located in Flood Zones 2 and 3. Therefore only "water compatible" or "essential infrastructure" uses are proposed on land identified as Flood Zones 2 and 3.

In light of the indicative layout, the proposal would comply with the requirements of the Sequential Test in locating all development within Flood Zone 1, with the exception of the access road.

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

Notwithstanding the position that the proposal would comply with a Sequential Test, the NPPG sets out that essential infrastructure (the main access road in the instance), that is within Flood Zones 3 a and b, must meet the Exception Test set out in Paragraph 102 of the NPPF.

In response to the first test (102), the applicants have set out a host of benefits to the community, and in response to the second, the Addendum FRA demonstrates that appropriate flood compensation storage can be provided and that the site will be safe for its lifetime.

Officers are satisfied therefore that the exception test and sequential test have been passed.

- Surface Water Drainage

The submitted Drainage Statement sets out that the underlying geology of the site is anticipated to be primarily Weald Clay formation with a localised band of superficial river terrace deposits in the centre of the site. As such, the permeability characteristics of the site are likely to be poor and infiltration techniques would not be effective.

As such, the Drainage Strategy indicates that surface water discharge from the site would be attenuated from each catchment to ensure that flows do not exceed pre-development rates. As infiltration is not believed to be a viable disposal method, run off would be attenuated through the use of detention basins with flow controls placed on the outlets to restrict discharge to the canal. In-situ testing would determine actual infiltration characteristics and the detention basins could be altered to benefit from any volume that could be discharged to groundwater if suitable rates are achieved.

The updated drainage strategy provided by the applicants provides further details relating to the current run-off rates associated with the site, with accompanying evidence which seeks to support the conclusions of the original drainage strategy – that infiltration is not a feasible option.

In this instance, the LLFA response sets out a requirement to provide run-off rates for the site, current discharge rates, proposed discharge rates (no greater than existing), showing a modelled network detailing that there is no flooding onsite, existing drainage layout and details of sub catchments. It also demonstrates that the peak discharge from the site of surface water plus treated foul effluent would be equal to the greenfield run off rate. In addition to this, the surface water management would incorporate sustainable drainage techniques to restrict surface water drainage from the site and improve the water quality of the run off. Further techniques would be incorporated at source or during conveyance such filter strips for collection or open swales.

The LLFA has advised that the proposed drainage scheme meets the requirements set out within the NPPF, NPPG and Non-statutory Technical Standards for SuDS, subject to suitably worded conditions to ensure the SuDS scheme is properly designed, implemented and maintained throughout the lifetime of the development.

- Foul Water Drainage

The submitted Drainage Strategy considers in detail the potential methods to discharge foul water drainage associated with the proposed development. The Drainage Strategy rules out the possibility of linking to the existing foul sewer network due to insufficient capacity in the local network, and it states that, in this instance it is considered that the level of reinforcement required to the public network would make connection to existing infrastructure financially prohibitive.

The applicants therefore propose an on-site sewage treatment works (STW) to serve the proposed development. The proposed STW would be located at the northern end of the site near the entrance from Stovolds Hill. The works would be located next to the Anaerobic Digester plant which has been consented, but as yet unbuilt, in this location. The proximity of these facilities would enable the use of the solid by-product of the STW to be utilised by the anaerobic digester plant which could offset the power demands of the development on the wider infrastructure as part of the overall energy strategy. It is proposed the STW would be built to an adoptable standard.

As the development would be phased, the STW must be able to accommodate each cumulative phase. The settlement and biological treatment of foul wastewater would consist of a number of tanks, when fully operational, to service the whole development. It is therefore proposed to construct the STW and utilise a proportion of the tanks at commencement, bringing more tanks on line as the load increases. This would ensure that the

STW receives the nutrients from the flow to sustain the treatment processes while being able to cope with the increasing flow demands as the development is completed. This arrangement would also allow for potential future expansion should this be required.

In terms of discharge from the STW, the underlying site geology on-site is anticipated to be Weald Clay Formation and historic boreholes have identified the presence of clay on the site. The applicants consider that the permeability characteristics of the site are likely to be poor and infiltration to ground may be impractical. The Sewage Treatment Works are therefore indicated to discharge to the Wey & Arun Canal on the eastern boundary of the site. This of course would be subject to agreement by the EA and appropriate permit being issued, separate to the planning, for the discharge of treated foul water to an existing watercourse.

An initial response from the Environment Agency raised objection to this, on the basis that insufficient information had been submitted to demonstrate that the discharge of foul water into an existing watercourse, would not harm water quality.

In response to this, the applicants have submitted an updated report which seeks to address the concern regarding water quality and the Water Framework Directive. The report demonstrates the feasibility of delivering the required infrastructure, as well meeting the Water Frameworks Directive, through use of a high specification sewage treatment works.

The response of the Environment Agency to this additional information is awaited. Notwithstanding this, and following discussions with the Environment Agency, the current objection, is considered not to be a fundamental objection to the proposal, but rather a matter of detail to be addressed. Nonetheless, once this response is received, further clarity will be provided in the form of an oral report to the Committee meeting.

The on-going management, maintenance and financial responsibilities of both the SuDS and SWT would to be secured by the S106 Legal Agreement, to ensure the ongoing ability for these systems to serve the development in perpetuity.

Thames Water has considered the proposed development and requests that a 'Grampian' style condition be applied to the application to secure full details of the proposed foul drainage scheme to be agreed prior to development commencing. Such a condition would secure full details of the proposed foul drainage provision and ensure that appropriate foul drainage could be achieved.



## Utilities

The NPPF states that there are three dimensions to sustainable development; the economic dimension of this includes the provision of appropriate infrastructure to serve a development. Owing to the size of the development, there would be additional pressures on existing utilities infrastructure.

The proposed utility infrastructure for the development is set out within a Utility Infrastructure report. This report considers the impact on existing infrastructure including both locally and upstream, in accommodating the increased infrastructure demand, and the distribution and coordination of new services within the development site.

The report considers the following services: broadband, water, gas, and electricity. The report identifies appropriate reinforcement works, and interim reinforcement works to meet a phased report. The identified reinforcement works are considered to be achievable. With appropriate reinforcement, the surrounding infrastructure could accommodate the proposed development.

Thames Water has provided comments on the application in respect of waste and water. The response confirms the findings of the submitted utilities report, namely that subject to appropriate conditions being imposed to secure improvements to existing infrastructure, the surrounding infrastructure could accommodate the proposed development. As such, no objection has been raised.

Specifically, conditions would be required to secure a drainage strategy to cover both on and off site drainage works to ensure appropriate infrastructure for foul and surface water. The application proposes to deal with the development's foul water flows using onsite sewage treatment. The drainage strategy would allow Thames Water to assess the feasibility of the onsite treatment. A phased approach to the development would allow for Thames Water to ensure that suitable water supply infrastructure is in place to serve the new development. Further detail and analysis of surface water are contained with the Surface Water Drainage section of this report (above).

In respect of electricity supply to the development, UK Power Networks have reviewed the proposed development, confirming that there are several UK Power network assets distributing electricity in the vicinity of the application site. As such, no objection has been raised in this regard.

A strategy for the provision of high speed broadband would be required and secured by condition, should permission be granted.

Officers are therefore satisfied that appropriate utilities could be provided to the development, subject to improvements which could be secured by condition, without adversely impacting on existing infrastructure.

### Impacts on Heritage Assets

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering applications which affect Listed Buildings, Local Planning Authorities must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. In accordance with this, the NPPF and Policies HE1, HE3 and HE5 of the Local Plan 2002 state that development should preserve or enhance the character and setting of Listed Buildings.

The NPPF states that, as a core planning principle, heritage assets, in a manner appropriate to their significance should be conserved. Heritage assets can include locally identified buildings of local architectural or historic interest.

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

The NPPF defines 'significance' as the value of a heritage asset to this and future generations because of its heritage interest. That interest may be historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

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

Paragraphs 131 states that, 'in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation

of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness’.

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

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

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

Paragraph 135 states that “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

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

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

Pursuant to the Barnwell decision and the decision of the Court of Appeal in Forge Field Society, the finding of harm to the setting of a Listed Building or a

Conservation Area gives rise to a strong presumption against planning permission being granted. If harm is identified then the decision maker should acknowledge that there is a presumption against permission.

Historic England recently carried out thematic research on the significance of surviving temporary airfields across England. Dunsfold Aerodrome was one of around 280 temporary airfields with paved runways, perimeter tracks and hard standings built in England during WWII.

The Council has received a request for Dunsfold Park Aerodrome to be designated as a Conservation Area. The request seeks to protect the non-designated Heritage Assets on site. This request is noted, and an undertaking to carry out an appraisal of the site is being made by the Local Planning Authority. However, the following assessment considers both non-designated and designated Heritage Assets within and around the application site.

Advice from the Council's Legal Team and Heritage Officers confirms that the request for the site to be considered as a Conservation Area does not prevent a recommendation being made on the current planning application. The application must be considered on the basis of the current designations on and off site. There are examples of airfields within Surrey which have been designated as Conservation Areas, including Kenley and Brooklands. The latter includes a significant level of development.

If following an appraisal, the Council consider that the designation of the site as a Conservation Area is appropriate; this would inform the position going forward, in considering the Reserved Matters. In addition, the condition securing a Masterplan should make specific reference for the need to preserve, enhance or understand the undesignated Heritage Assets on the site. The development of the site will also allow for undesignated Heritage Assets to form part of the public domain.

The undesignated heritage assets are considered to be:

- Aerodrome and associated buildings / structures
- Primemeads
- Broadmeads
- Wey and Arun Canal
  
- Off site Listed Buildings (Designated Heritage Assets) and heritage features

Paragraph 9.37 Vol 1 of the Environmental Statement identifies a total of 118 Listed Buildings, Monuments or historic structures off site, within a 1 km

radius. Of these, 40 Grade II Listed Buildings are identified. Of these, the closest buildings are Tickners Heath Farm Cottage, which is a 17<sup>th</sup> Century building located 50m from the south boundary. To the north is High Billingham Farm House, which is a 16<sup>th</sup>/17<sup>th</sup> Century building and Stovolds Hill Farm which is a 17<sup>th</sup> Century building. To the east are Fastbridge Farmhouse, Fastbridge Cottage (17<sup>th</sup> Century Cottage, restored in 20<sup>th</sup> Century) and Fastbridge (bridge over the Wey and Arun Canal Grade II Listed), Honeymead Cottage (early 20<sup>th</sup> Century). The buildings are significant in illustrating the historic character of the area as one primarily based on an agricultural economy and served by relatively small farm estates. The architecture reinforces an understanding and appreciation of the Surrey vernacular and of the availability of building materials. The identified structures are considered to be of a sufficient distance from the application site, such that the primacy and understanding of the buildings would not be materially affected by the proposals. There would be some indirect impacts on the setting of the off site buildings, which would be affected to a modest degree by the increased noise and activity. This harm would be indirect and would mainly affect the overall rural character of the area rather than only the setting of the listed buildings.

The level of harm to the off site listed buildings is therefore considered to be negligible, and it is considered that the proposal would preserve the setting of the Listed Buildings, in compliance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. As such, the proposal would not trigger the balancing exercise contained in paragraphs 133 and 134 of the NPPF.

- Primemeads and Broadmeads Cottage (non-designated heritage assets)

In relation to the heritage of the site there are two periods that are clearly represented by surviving structures. Primemeads is a composite house built over many years but the earliest part is timber framed. There is evidence to suggest significant work was undertaken in the late seventeenth century. The earliest part may be 16<sup>th</sup> Century but recycled in this location as many of the timbers have mortices not relating to the current frame. The significance of this building therefore lies in its reminder of an earlier (16<sup>th</sup>/17<sup>th</sup> Century) period. This building is not the subject of a formal designation. However, Historic England has received an application, to consider Primemeads for designation as a Grade II Listed Building. The Council's Historic Buildings Officer has advised that there is a reasonable likelihood of the building being listed. Historic England advises that any aspect of the proposal that would be affected by the designation should be deferred for consideration until such time as the assessment of Primemeads has been made. The advice of the

Council's Lawyers and the Council's Historic Buildings Officer, who recommended the designation, has stated that since it is not proposed to be demolished or otherwise directly affected by the proposed development, this need not interfere with the determination of the application.

Nonetheless, the current application should be considered based on the current policy designations. As such, at this stage only very limited weight can be attached to the pending application for listing.

The second timber framed building on the site is Broadmeads Cottage. This is the cottage moved by the Canadians when laying out the airfield. This building was moved to the edge of the airfield and is now in a poor state of deterioration. Officers consider that the building could not be salvaged and suggest a photographic record is made before it is demolished. This could be required by condition if permission is granted.

The loss of Broadmeads, a non-undesigned heritage asset, is considered to be acceptable by Officers, given its poor condition and the lack of a realistic prospect of preserving it. There would be no conflict with paragraphs 129 and 135 in this regard.

In relation to Primemeads, as it is not proposed to be demolished or otherwise directly affected by the current proposal. Primemeads historically faced the road which was a continuation of Stovolds Hill. It would be beneficial if this route between Stovolds Hill and Compass Bridge were better revealed through the layout details of the scheme, perhaps as a cycle way. It is considered that through the retention of this building, the proposal would satisfactorily minimise any conflict between the heritage asset's conservation and the proposal. It is therefore concluded that there would be no harm to the setting of this building which is a non designated heritage asset. Officers are therefore satisfied that paragraphs 129 and 135 are met.

- Historic Airfield

Officers have had regard to the expertise of Historic England in assessing the impact on the non designated heritage assets.

The research by Historic England highlighted that at Dunsfold Aerodrome the wartime airfield layout survives relatively intact (Francis et al, 2013) and the airport is significant due to its role as a visible reminder of the site's former use. This contributes to an understanding that this was once an airfield and helps create the distinct character that defines the site today. However, while the flying field remains more or less intact only a small number of the associated wartime buildings are thought to survive. Historic England's

assessment concludes that Dunsfold should be regarded as an undesignated heritage asset under the terms of the NPPF having regard to its significance for the following reasons:

“It is not only surviving physical features that contribute to the interest of Dunsfold Aerodrome but also less tangible aspects of its former use. As an operation station rather than a training station the airfield is associated with a number of wartime events and personnel who worked or flew from it and these aspects of its history have historic and commemorative value.”

The applicant has complied with the requirements of Paragraph 128 of the NPPF through describing accurately the significance of the heritage assets.

The airfield is an important historic asset and is a record of military activities during WWII. The airfield was also used during the twentieth century by the Hawker Sideley Company to design and test their prototypes for the Harrier jet. The remaining runway and jump pads are significant structures that should be respected by the proposed development.

Historic England advises that the significance of Dunsfold as an undesignated Heritage asset, namely the features that illustrate the site’s previous use as an airfield including most of the runways and the openness of the land around them, would be lost as part of this proposal. As such, Historic England considers that the proposal would harm the significance of Dunsfold Aerodrome as an undesignated heritage asset.

Historic England therefore advises that “consideration must be given to the individual significance of and contribution to character made by individual structures and the infrastructure of an airfield”. In this respect, Historic England is critical of the indicative layout.

“Much of the layout of the new settlement does not knowingly acknowledge the site’s existing spatial character which is largely characterised by linear roads and runways with built development largely found on the fringes of the airfield. While we acknowledge that inevitably some of the flying field would be built on with a development of this scale, we nonetheless think the masterplan for this site misses an opportunity to create a new settlement which acknowledges and celebrates the site’s layout and historic character.”

Notwithstanding this, it is considered that the current layout fails to take advantage of key opportunities to preserve the significance of the airport, specifically to retain/emphasise significant features on site such to provide a lasting reminder of the site’s former use as an airfield. This is a concern expressed by both Historic England and Design South East in their reviews.

However, it is important to note that no objection has been raised by either body, and similarly no objection has been raised by the Council's own Historic Buildings Officer to the loss of the airfield and the layout provided is for indicative purposes only as 'layout' is a reserved matter. The principle of the application is therefore considered to be acceptable. Given that the application is in outline form, and the submitted layout is indicative, Officers are satisfied that through amendments/revisions to the layout, it would be possible to preserve sufficient features on site, such to provide a lasting reminder of the site's former use as an airfield. The design/layout section of this report recommends that any resolution to grant be subject to a condition to secure the provision of an appropriate Masterplan and process of review, which respects the Heritage Assets on site.

It is acknowledged that elements of the airfield would be lost, which is of course being considered as a non-designated Heritage Asset. As such, the requirements of paragraph 135 of the NPPF must be considered and a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Through improvements to be identified to the layout that would need to follow the advice of Historic England and the Council's Historic Buildings Officer, Officers are satisfied that the requirements of paragraphs 129 and 135 of the NPPF are met, in that subject to the improvements to the indicative layout, which would be assessed as part of a reserved matters application, the proposal would take appropriate opportunity to "avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal".

- Wey and Arun Canal and Farnhurst Bridge – non-designated heritage asset

The Wey and Arun Canal is considered to be an non-designated heritage asset.

The significance of a heritage asset derives not only from its physical presence and historic fabric but also from its setting. The Wey and Arun Canal consists of an historical route through the Waverley countryside. The Canal makes an important contribution to the quality of the places through which it passes.

The proposal would include the retention and enhancement of the Canal with a new basin to be constructed to provide mooring space. The applicants have indicated that the proposal would aid the aspiration for recreational use of the Canal.



There would be an impact on the Canal and bridge from the construction of the proposed access road and new bridge.

The impact on the Canal and bridge cannot be fully assessed until the reserved matters stage when details on the layout, appearance and landscaping would be submitted. However, it is noted that the indicative details show that works to the Canal would allow mooring boats to pass through, and would introduce more visitors and travel along the Canal. This would better enable the public to appreciate the historic Canal and valued landscape.

Through appropriate landscaping, and a sensitive design, Officers are satisfied that a scheme could be achieved that would satisfactorily preserve the heritage asset, without causing significant harm.

- Heritage conclusions

There are no on site designated heritage assets.

There would be no harm to designated heritage assets, as such the balancing tests set out in paragraphs 133 and 134 of the NPPF are not engaged. However, there would be some harm to the airfield, which is a non-designated heritage asset, therefore paragraph 135 is engaged.

It is considered the subject to securing an appropriate layout, following the advice of Historic England and the Council's Historic Buildings Officer that the loss of the airfield and run-off areas would result in minimal harm. The retention of the main runway and jump pads, which are considered to be significant structures, would be respected and retained as part of the development. As such, the balanced judgement required, is that the minimal harm would be outweighed by the benefits of the scheme, including placing historic assets in the public domain and the long term preservation of significant non-designated Heritage Assets.

The setting of the identified off site Listed Buildings (designated Heritage Assets) would be satisfactorily preserved such to accord with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

In summary, officers are satisfied that the principle of development would be acceptable in heritage terms, and that the quantum of development proposed could be achieved in an acceptable manner without causing any material harm to any designated, or undesignated heritage assets.

## Air quality

Paragraph 120 of the NPPF states that planning decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area of the area or proposed development to adverse effects from pollution, should be taken into account.

Paragraph 124 states that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

Policy D1 of the Waverley Borough Local Plan 2002 states that the Council will have regard to the environmental implications of development and will promote and encourage enhancement of the environment. Development will not be permitted where it would result in material detriment to the environment by virtue of noise and disturbance or potential pollution of air, land or water, including that arising from light pollution. In the same vein, Policy D2 states that the Council will seek to ensure that proposed and existing land uses are compatible. In particular, development which may have a materially detrimental impact on sensitive uses with regard to environmental disturbance or pollution will not be permitted.

The site is not located within a designated AQMA. Notwithstanding, given the scale of the proposed development it has the potential to impact on designated AQMAs in both Bramley and Godalming. Therefore air quality remains an important material consideration.

The introduction of residential properties to the area may expose the future occupants to air pollution associated with road traffic and is likely to increase road usage in the area by the occupants.

There are also potential concerns relating to local air quality through any potential emissions during the construction phases of the project, affecting existing receptors in the area through potential fugitive dust emissions and by increased traffic to the site during development.

It should be noted that the impact of dust and emissions from construction could have a significant impact on local air quality. As there is no safe level of exposure, all reduction in emissions will be beneficial.

In light of the above, mitigation measures are recommended to be secured via condition should permission be granted. These include a Site Management Plan, Low Emission Strategy (LES), hours of construction and no burning of materials on site. As set out earlier in this report, from an air quality perspective, there would be no residual significant impacts in EIA terms subject to appropriate mitigation. The Air Quality information was reviewed by the Council's Environmental Health Officer who has raised no objection to the proposal.

Subject to the imposition of suitable mitigation measures, particularly throughout the construction stage, it is concluded that the impact on air quality would be acceptable.

### Land contamination

Paragraph 120 of the NPPF states that planning decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area of the area or proposed development to adverse effects from pollution, should be taken into account. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

Policy D1 of the Local Plan sets out that development will not be permitted where it would result in material detriment to the environment by virtue of potential pollution of air, land or water and from the storage and use of hazardous substances.

The supporting text indicates that development will not be permitted unless practicable and effective measures are taken to treat, contain or control any contamination. Wherever practical, contamination should be dealt with on the site.

The application includes a Phase 1 Land Quality Report. The report identifies the following potentially contaminative uses from the historical use of the site:

- Historic military and aircraft development airfield use
- Made ground associated with buildings, runways and general site use
- Current airfield activities
- Made ground associated with waste disposal in West End Overshoot area formerly used for vertical take-off testing
- Current and historic fuel storage
- Formal and informal waste activities on site

- Burning with fuel accelerants and extinguishing in former fire training area, and continued use for onsite waste disposal
- Historic storage of grass cuttings

The Phase 1 Land Quality Report concludes that there are a number of areas that would require further investigation after the planning application stage. Following this investigation, it is anticipated that there would be a requirement for more targeted investigation and assessment and, possibly remediation. This work should be programmed so that it dovetails and complements the proposed phased development of the project.

The Council's Environmental Health Officer considers that the submitted report provides a thorough and comprehensive site walkover and up to date analysis of the site's current uses, and a review of previous investigation reports completed at the site.

The Land Quality Report has been reviewed by the Council's Land Contamination Officer who has confirmed that they agree with the conclusion and content of the report and its recommendation for the need for further site investigation and the potential preparation of a remediation strategy for the site depending on the outcome of further sampling. Appropriate conditions would be imposed to secure these, should planning permission be granted.

In light of the above, Officers consider that the proposal would accord with Policy D1 of the Local Plan 2002 and the NPPF in this regard.

### Archaeology

Paragraph 128 of the NPPF sets out that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.

Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

The construction phase has the potential to impact on below ground archaeology and the loss of historical features on the site. The site has a varied and significant history associated with its World War Two use and later association with the aviation industry and the proposed development therefore has the potential to impact upon a number of potential heritage assets.

The Environmental Statement (ES) baseline archaeological information provides a detailed view of the known heritage assets on site and identifies potential for buried archaeological remains to be present. Officers agree with the conclusions of the ES which identifies a need for further archaeological investigation to understand the archaeological potential.

In respect of the standing buildings, an approach combining preservation of the key elements with detailed recording of those to be demolished.

The County Archaeologist has identified a need to update the photographic record of significant buildings. However, notwithstanding this no objection is raised subject to conditions to secure an appropriately scaled field evaluation and an updated statement of heritage significance.

The impact on archaeological interests could be sufficiently controlled through the imposition of conditions. The proposal is therefore considered to comply with Policy HE15 of the Waverley Borough Local Plan 2002 and advice contained within the NPPF 2012.

### Infrastructure

Policy D13 of the Local Plan states that “development will only be permitted where adequate infrastructure, services and facilities are available, or where the developer has made suitable arrangements for the provision of the infrastructure, services and facilities directly made necessary by the proposed development. The Council will have regard to the cumulative impact of development, and developers may be required to contribute jointly to necessary infrastructure improvements”.

Local Plan Policy D14 goes on to set out the principles behind the negotiation of planning obligations required in connection with particular forms of new development. The current tests for legal agreements are set out in Regulation 122 (2) of the CIL Regulations 2010 and the guidance within the NPPF.

Policy ICS1 of the Pre-submission Local Plan Part 1 2016 states that infrastructure considered necessary to support new development must be provided either on- or off-site or by the payment of contributions through planning obligations and/or the Community Infrastructure Levy. The Council

will resist the loss of key services and facilities unless an appropriate alternative is provided or evidence is presented which demonstrate that the facility is no longer required. New services and facilities where required will be supported. Land for infrastructure, as identified through the Infrastructure Delivery Plan, will be safeguarded.

Paragraph 203 of the NPPF states that Local Planning Authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

Paragraph 204 of the NPPF states that planning obligations should only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Paragraph 205 of the NPPF states that where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled.

The NPPF emphasises that to ensure viability, the costs of any requirements likely to be applied to development, such as infrastructure contributions should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

From 6<sup>th</sup> April 2015, CIL Regulation 123 was amended to mean that the use of pooled contributions under Section 106 of the Town Country Planning Act is restricted.

At that point, no more may be collected in respect of a specific infrastructure project or a type of infrastructure through a Section 106 agreement, if five or more obligations for that project or type of infrastructure have already been entered into since 6<sup>th</sup> April 2010 and it is a type of infrastructure that is capable of being funded by CIL.

Officers recognise that the impact upon infrastructure and the requirement for the development to satisfactorily mitigate its impact is one of the key concerns that have been raised against this significant application. The areas of

infrastructure concern particularly relate to transport, sewage, water supply, education and health facilities.

In the light of the above change, the infrastructure providers have been requested to identify relevant and justified contributions/projects that meet the tests of CIL Regulations 122 and 123. The final obligations to be included within the Section 106 agreement will need to satisfy the tests of the Regulations.

The applicant has indicated a willingness to enter into a suitable legal agreement to secure relevant contributions as set out in the “proposal” section of the report, the proposed heads of terms are set in detail above, under the proposed ‘Heads of Terms’.

In drawing up the above Heads of Terms, officers have actively engaged with the relevant Parish Councils, to identify any infrastructure requirements resulting from the development. Where this has process has identified relevant and justified contributions/projects, these would be secured as part of the Section 106 Agreement. The Heads of Terms includes a £2.7m transport fund for monitoring of the transport impact, and for spend on improvements subsequently identified to be necessary.

As of yet, a signed and completed legal agreement has not been concluded. However, it is anticipated that an agreement would be entered into. Subject to the receipt of a suitable, signed legal agreement to secure infrastructure contributions, it is concluded that the proposal would adequately mitigate for its impact on local infrastructure and the proposal would comply with the requirements of the Local Plan and the NPPF in respect of infrastructure provision.

#### Financial considerations

Section 70 subsection 2 of the Town and Country Planning Act 1990 (as amended) states that any local financial considerations are a matter to which local planning authorities must have regard to in determining planning applications; as far as they are material for the application.

The weight to be attached to these considerations is a matter for Committee/decision maker.

Local financial considerations are defined as grants from Government or sums payable to the authority under the Community Infrastructure Levy (CIL). This means that the New Homes Bonus (NHB) is capable of being a material consideration where relevant. In the current case, the approval of the

application would mean that the NHB would be payable for the net increase in dwellings from this development. The Head of Finance has calculated the indicative figure of £1,450 per net additional dwelling total of £2,610,000 (based on 1,800 dwellings) per annum for six years. A supplement of £350 over a 6 year period is payable for all affordable homes provided for in the proposal, this would amount to an indicative figure of £189,000.

This is a significant sum which would make a considerable contribution to support the Council's future financial position. The Government has made it clear that this should be weighed into the balance of considerations on this application.

#### Cumulative effects/in-combination effects

It is important that the cumulative effect of the proposed development and any other committed developments (i.e. schemes with planning permission, (taking into consideration impacts at both the construction and operational phases), or those identified in local planning policy documents) in the area are considered.

Cumulative effects comprise the combined effects of reasonably foreseeable changes arising from the development and other development within a specific geographical area and over a certain period of time. The significance of cumulative impacts needs to be assessed in the context of characteristics of the existing environment. This is to ensure that all of the developments:

- Are mutually compatible; and
- Remain within the environmental capacity of the area and its environs.

The applicant has identified 14 developments and considered their cumulative impacts. These are listed within the Environmental Impact Assessment – Chapter 17 Section of this report. Those identified include sites in Cranleigh, Alfold and Godalming. The applicant concludes that there would be no significant negative cumulative impacts arising from the proposal.

Officers consider that the schemes identified within the Environmental Statement could be reasonable foreseeable as coming forward. Officers consider that only schemes with planning permission should be taken into account at this stage. A number of the identified schemes have since been refused or are still pending decisions. This approach would be consistent with that taken on other applications such as at Land South of High Street in Cranleigh (WA/2014/0912).



Officers have in considering the proposed development taken account of the in combination and cumulative impacts of the development. It should also be noted that the highway safety and parking section of this report takes into account any cumulative highways impacts. These matters are not therefore repeated here. The conclusions of the EIA Chapter 17 section of this report are of relevance here – namely that there would be no significant cumulative negative residual impacts resulting from the development.

Officers consider, having regard to the key consultee responses, that the key areas where there is potential for adverse cumulative impacts are:

- Increased demands on infrastructure, including sewage, water, education, community and health infrastructure
- Impacts from habitat loss and disturbance / Increased pressures on the Chiddingfold Forest SSSI
- Impacts from amenity (noise, vibration, light, dust and visual) resulting from the construction process

Having regard to the above considerations it is considered that the relevant other developments, as well as the current application, propose sufficient mitigation such to mitigate against the impacts of their own development. Having regard to the views of relevant consultees, officers are satisfied that subject to the inclusion of appropriate conditions securing appropriate mitigation, there would be no adverse cumulative impacts.

### Crime and disorder

S17(1) of the Crime and Disorder Act 1998 places a duty to consider crime and disorder implications on local authorities. In exercising its various functions, each authority should have due regard to the likely effect of those functions on, and the need to do all that it can to prevent, crime and disorder in its area. This requirement is reflected in the National Planning Policy Framework, which states that planning policies and decisions should promote safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

Paragraph 69 of the National Planning Policy Framework 2012 highlights that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.

To this end, planning policies and decisions should aim to achieve places which promote, inter alia, safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

Surrey Police Crime Prevention Advisor has been formally consulted on the application and has requested that consideration be given to gaining Secured by Design certification for this development. This would ensure that the properties are constructed with a good level of basic security. However, as the Council does not currently have a policy to require this, it would not be reasonable to request this condition, however an informative is recommended to encourage the applicant to seek to achieve Secured by Design certification.

As the application is in outline form only, and the layout of the site is yet to be submitted, this matter would be considered fully as a reserved matter if outline permission is granted. Nonetheless, officers are of the view that the site could be developed in such a way so as to not lead to crime and disorder in the locality which would accord with the requirements of the NPPF 2012 and the Crime and Disorder Act 1998.

### Health and wellbeing

Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making. Public health organisations, health service organisations, commissioners and providers, and local communities should use this guidance to help them work effectively with local planning authorities in order to promote healthy communities and support appropriate health infrastructure.

The Waverley Borough Corporate Plan 2016 recognises the wellbeing of residents as one of 4 key priorities for the Council. The Corporate Plan is capable of constituting a material consideration in the determination of planning applications.

The NPPG sets out that the range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure, including how:

- development proposals can support strong, vibrant and healthy communities and help create healthy living environments which should, where possible, include making physical activity easy to do and create places and spaces to meet to support community engagement and social capital;
- the local plan promotes health, social and cultural wellbeing and supports the reduction of health inequalities;

- the local plan considers the local health and wellbeing strategy and other relevant health improvement strategies in the area;
- the healthcare infrastructure implications of any relevant proposed local development have been considered;
- opportunities for healthy lifestyles have been considered (e.g. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces and opportunities for play, sport and recreation);
- potential pollution and other environmental hazards, which might lead to an adverse impact on human health, are accounted for in the consideration of new development proposals; and
- access to the whole community by all sections of the community, whether able-bodied or disabled, has been promoted.

The need to maximise opportunities to improve the quality of life and health and well-being of current and future residents is echoed in Policy TD1 of the Pre-submission Local Plan Part 1 2016. This policy states that the Council will seek to maximise opportunities to improve the quality of life and health and well-being of current and future residents, for example the provision of:

- private, communal and public amenity space
- appropriate internal space standards for new dwellings
- on site play provision
- appropriate facilities for the storage of waste
- private clothes drying facilities

The proposal includes a number of aspects that contribute to health and wellbeing:

- The provision of open space,
- extensive parkland,
- children's play facilities,
- pedestrian and cycle routes and an adventure trail

These are considered to be positive in terms of the health and well being of future residents and also existing residents near the site. Additionally, the risks of pollution or other adverse impacts on the amenities of future residents, are minimised through the suggested mitigation measures

The Council has sought the views of NHS England, Health Watch, Guildford and Waverley Clinical Commissioning Group and the Director of Public Health for Surrey. The Guildford and Waverley Clinical Commissioning Group supports the proposal for a new health facility, subject to the detailed design and size. The CCG has also confirmed that it is expected there would be

sufficient capacity and capability across the two nearest practices in Cranleigh and Chiddingfold to support the development from a GP perspective.

As the application is in outline form only, the layout of the proposal would form a consideration at the reserved matters stage should outline permission be granted. Nonetheless, having regard to the indicative layout plan, and taking into account the views of consultees, officers consider that the proposal could be developed in an acceptable way so that it adequately provides for the health and well-being of its future residents. This would include the provision of private amenity space, public open space and play space. These provisions would be beneficial terms of the health and wellbeing of future residents and would be the subject of further consideration at the reserved matters stage.

### Consultation

The application is accompanied by a Statement of Community Involvement (SOCi). The umbrella legislation for consultation on planning applications, the Development Management Procedure Order 2015 requires this on major applications.

Officers are satisfied that the applicant has complied with the requirements of the Development Procedure Order 2015, and that the scope and content of the submitted Statement of Community Involvement are proportionate to the development concerned.

### Accessibility and Equalities Act 2010 Implications

Policy D9 of the Local Plan 2002 encourages and seeks provision for everyone, including people with disabilities, to new development involving buildings or spaces to which the public have access.

Having regard to the indicative information supplied, Officers are satisfied that the proposal is capable of complying with this Policy. However, this would be the subject of further consideration at the reserved matters stage.

From the 1st October 2010, the Equality Act replaced most of the Disability Discrimination Act (DDA). The Equality Act 2010 aims to protect disabled people and prevent disability discrimination.

Officers consider that having regard to the indicative details supplied, there are no accessibility or equalities issues arising from the proposal. However, these matters would be the subject of further consideration at the reserved matters stage

## Human Rights Implications

The proposal would have no material impact on human rights, going beyond the material planning considerations set out in this report.

## Pre Commencement Conditions

Article 35 of the DMPO 2015 requires that for any application for planning permission, the Notice must state clearly and precisely the full reasons, in the case of each pre-commencement condition, for the condition being a pre-commencement condition. This is in addition to giving the full reason for the condition being imposed.

“Pre commencement condition” means a condition imposed on the grant of permission which must be complied with: before any building/ other operation/ or use of the land comprised in the development is begun.

Where pre commencement conditions are justified, these are provided with an appropriate reason for the condition.

## Responses to issues raised by Third Parties and Parish Councils

A number of concerns have been highlighted in third party representations as well as in the Parish Council responses, which includes 11 Parish Councils, both jointly and independently. It is also noted that a number of letters in support of the proposal have been received. All comments received have been very carefully considered by officers and it is considered that all matters have been addressed in detail above.

The majority of concerns raised relate to highways and traffic matters, landscape and visual impact, impact on neighbouring amenity, drainage and flooding, ecology, provision of amenity/play space, loss of existing uses, air quality and land contamination. The report is considered to have been comprehensive in discussing such matters in relevant sections above, in which expert advice from relevant statutory consultees is set out.

The Parish Council’s joint response sets out key concerns, in particular with relation to the suitability of the location to accommodate the quantum of development proposed as well as the impact upon the local highway network and prematurity in advance of the adoption of the draft Local Plan. It is considered that these matters have been addressed in detail under the report heading ‘Location of Development’, ‘Highways, Access and Parking’ and ‘Prematurity’.

In considering the key tests set out in the NPPF, as to whether a decision would be premature in advance of the Plan Making process, officers are satisfied that the proposal would not conflict with the key prematurity tests. This position is supported by advice provided by Counsel. As such, a grounds of refusal is not considered to be supportable, given the nature of the development, the proposals conformity with the draft Local Plan Part 1 and its stage of preparation.

To summarise the key conclusions of the report on sustainability, in particular transport sustainability, it is considered that a number of essential services and facilities would be provided on-site, this includes provision for employment, convenience shopping, education (early years and primary), health provision, community facilities, public open space that would incorporate areas for sport and play. A permanent bus service is also secured, which will provide regular services to the surrounding settlements of Guildford, Godalming, Cranleigh and Horsham. Therefore, whilst the site is located in a remote location, the improvements and services proposed would certainly minimise the need to travel out of the settlement for general day to day needs. It is, however, accepted that the site's location is only one factor that must be weighed in the overall consideration of sustainable development.

In terms of the impact upon the surrounding transport network, the proposal includes a number of highway improvements, to accommodate the additional traffic flows identified. The County Highway Authority and Highways England have confirmed that the proposal would not have a severe impact upon the operation of the highway network. As such, the proposal would comply with the policy tests set out within Paragraph 32 of the NPPF. The proposed heads of terms also include provision of a Monitor and Manage fund, to address any unforeseen impacts upon the local highway network, in particular to address any specific unforeseen impacts upon local country lanes serving Dunsfold, Alfold and the surrounding villages. Further work has also been carried out by Mott MacDonald to ascertain the impact of HGVs associated with Dunsfold and how they use the surrounding highway network. This confirms that a relatively small number of trips by HGVs associated with Dunsfold actually use the country lanes within the locality.

Objections are also raised with regard to the harm to services and facilities and that the proposal does not seek to address this. The application has been subject to consultation with key service providers, including the County Education Authority, CCG, Surrey Police and Thames Water who are satisfied that the proposal would not have a detrimental impact on provision, subject to

the provision of the on-site facilities listed above and off-site contributions to service provision.

In terms of the wider visual impact of the development on the Surrey Hills AONB, Natural England has now set out that it would be willing to remove its objection to the scheme, subject to conditions to secure provision of appropriate landscaping, phasing and provision of the Country Park in perpetuity. In addition, the impact upon the countryside is also considered to be acceptable. The site predominantly comprises an open airfield, which does not take on the characteristics of open countryside. With the exception of a wider view from Hascombe Hill, the site is relatively well screened from the wider area, and its development is not considered to harm the wider countryside context.

#### Secretary of State call in-process

The power for the Secretary of State to “call-in” a planning application for his own determination is set out in section 77 of the Town and County Planning Act 1990. If a planning application is called-in, there will be a Public Inquiry chaired by a planning inspector, or lawyer, who will make a recommendation to the Secretary of State, who takes the final decision.

Any type of application can be called-in, however, in practice only a small number of applications are called in every year. The cases in which the Secretary of State might decide to use call-in powers might include cases which:

- may conflict with national policies on important matters
- may have significant long term impact on economic growth and meeting housing needs across a wider area
- could have significant effects beyond their immediate locality
- give rise to substantial cross boundary or national controversy
- raise significant architectural and urban design issues
- may involve the interests of national security or of foreign governments

The National Planning Casework Unit has confirmed that requests from third parties have been received to call-in the application. Should the Joint Planning Committee resolve to grant permission, the NCPU would, at that time, review the requests with the aim of making a recommendation to the Secretary of State on whether the case should be called in for his own determination. The NCPU anticipate that this process would take place concurrently with any S106 / legal agreements being finalised and completed, and prior to any formal decision being issued. Should the Council reach a point where it is in position to issue a decision to approve, the NCPU could

issue an Article 31 direction which would prevent the Local Planning Authority from issuing a decision until the NCPU's assessment process had concluded.

The officer recommendation is subject to referral to the Secretary of State and no subsequent call in being received.

Should the Committee resolve to refuse the application, the NCPU would have no further involvement, and no 'call-in' would follow.

#### Development Management Procedure Order 2015 - Working in a positive/proactive manner

In assessing this application, officers have worked with the applicant in a positive and proactive manner consistent with the requirements of paragraphs 186-187 of the NPPF. This included:-

Provided or made available pre application advice to seek to resolve problems before the application was submitted and to foster the delivery of sustainable development.

Provided feedback through the validation process including information on the website, to correct identified problems to ensure that the application was correct and could be registered;

Have suggested/accepted/negotiated amendments to the scheme to resolve identified problems with the proposal and to seek to foster sustainable development.

Have proactively communicated with the applicant through the process to advise progress, timescales or recommendation.

#### Conclusion/ planning balance

The starting point is the development plan and the policies set out above. In forming a conclusion, the NPPF is a significant material consideration. It requires that the benefits of the scheme must be balanced against any negative aspects of the scheme.

The NPPF sets out at Paragraph 7 that there are three dimensions to sustainable development, which include the economic, social and environmental dimensions.

The site is located within the Countryside beyond the Green Belt outside any defined settlement area. The NPPF states that, as a core planning principle



the intrinsic character and beauty of the countryside shall be recognised. Policy C2 of the adopted Local Plan 2002 states that building in the countryside, away from existing settlements will be strictly controlled. Substantial weight can now be given to this policy given that the Council can demonstrate a 5 year supply of housing.

Notwithstanding, the Council's housing supply figure does rely on 130 homes being delivered at Dunsfold Park in the next 5 years. This follows greater certainty regarding delivery of housing on the site following the draft allocation for 2,600 homes at Dunsfold Park, under Policy SS7 of the Pre-submission Local Plan Part 1.

In taking account of the current adopted Local Plan Policy C2, the principle of development would be unacceptable. However, whilst this Policy has a timeless element in terms of protection of Countryside beyond the Green Belt, account must be taken of the NPPF presumption in favour of sustainable development and its encouragement to use brownfield land as well as the Pre-submission Local Plan Part 1 policies.

The principle of the proposed development is considered to be acceptable, and for the reasons concluded below, the benefits have been found to outweigh any harm.

The site has been subject to a significant number of previous applications, where it has previously been determined that the site is in an isolated location, with limited sustainable means of transport being available to serve the site.

The Council's Sustainability Appraisal of the Local Plan (2016) includes an assessment of allocated and LAA (Land Availability Assessment) sites, which include the application site. This document recognises that a focus on development at Dunsfold is less than ideal from a transport perspective due to the site's relatively isolated location which can lead to high levels of car dependency.

The County Highway Authority also maintains its concern that notwithstanding the enhanced bus service provision, and sustainable links to Cranleigh together with the provision of on-site services and employment, the site is located in an unsustainable location in transport terms.

The proposal is also considered to be visible from a public viewpoint on Hascombe Hill, which forms a part of the Surrey Hills AONB. Natural England has raised an objection to the scheme. However, it has confirmed that it is not a fundamental objection to the scheme, and that further mitigation could be provided to remove its objection. Natural England have subsequently

confirmed that subject to the provision of the Country Park in perpetuity, provision of appropriate green infrastructure, including provision of green roofs and walls on any larger buildings they would be in a position to remove their objection to the scheme. Appropriately worded conditions are recommended to secure the requirements of Natural England.

The Surrey Hills AONB Planning Adviser has raised concern regarding the impact of additional traffic diverting to country lanes in the locality, which is considered to cause serious harm to the character and tranquillity of extensive parts of the Surrey hills AONB.

There would be no harm to designated heritage assets, as such the balancing tests set out in paragraphs 133 and 134 of the NPPF are not engaged. However, there would be some harm to the airfield, which is a non-designated heritage asset, therefore paragraph 135 is engaged.

It is considered the subject to securing an appropriate layout, following the advice of Historic England and the Council's Heritage Officer that the loss of the airfield and run-off areas would result in minimal harm. The retention of the main runway and jump pads, which are considered to be significant structures, would be respected and retained as part of the development. As such, the balanced judgement required, is that the minimal harm would be outweighed by the benefits of the scheme, including placing historic assets in the public domain and the long term preservation of significant non-designated Heritage Assets.

The setting of the identified off site Listed Buildings (designated Heritage Assets) would be satisfactorily preserved such to accord with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

In terms of the benefits of the scheme, the 1,800 dwellings would make a significant contribution to the Council's housing delivery over the emerging plan period. Delivery of affordable and market homes on brownfield land, in the context of the constraints that apply to the Borough would therefore comprise the most significant social benefit to flow from the proposed development and would be consistent with the NPPF's basic imperative of delivery.

Additional social benefits of the scheme comprise a significant level of community benefits to both future residents and existing residents or surrounding villages. The on-site provision includes a new two form entry Primary School, Early Years education provision, enhanced local bus services, Community Centre, Country Park, children's play, sport pitches and pavilion, Health Centre, Jigsaw School, Canal Basin and local village centre.

The proposal would deliver economic gains from a number of sources, including construction-based employment and increase in local spending together with the expansion and enhancement of the established business park on-site. This provides an expansion to a well-established business park and has the potential to deliver a net increase of up to 2,050 additional jobs. The expansion of the business park also includes the provision of small-medium sized business floor space.

In terms of technical matters, the application demonstrates that the site can be made safe from flood risk and the risk of flooding elsewhere would not be increased.

The proposal would in part result in the loss agricultural land; however, it would not result in the fragmentation of an agricultural holding. As such, officers consider the loss to be acceptable in this instance.

The applicants have submitted an overall housing delivery strategy, which demonstrates a commitment for proposed housing to meet the Council's recognised need. This also proposes a provision of 30% of the dwellings as affordable homes. The proposed heads of terms for the S106 Agreement include a mechanism to agree the mix and tenure of both market and affordable homes for each phase of the development. Therefore, the Council would be able to control the specific housing mix and ensure that it reflects the Borough need.

Detailed heads of terms have been agreed to secure a programme of highway improvement works to mitigate the impact of traffic generated by the development, on-site early years and primary education provision; an off-site contribution towards secondary education, future ownership, management and maintenance of on-site SuDS and sewage treatment works, play space and the proposed County Park, provision of the community building, health centre, funding for bus service procurement and any necessary subsidy for its retention in perpetuity, car club facility, leisure provision and police infrastructure.

Should Members agree the Officers' recommendation to approve the application, the heads of terms would form the basis for the S106 legal agreement, which would be completed to secure the above obligations.

Therefore, subject to the completion of the S106 legal agreement, the proposal would, in the Officers' view, effectively limit the impacts of the development. In addition, the proposal would improve accessibility to the site by non-car modes of travel.

The social and economic benefits of the scheme are considerable. The need for new housing in the area is undisputed and in Waverley, the expectation is for brownfield sites to be developed ahead of additional green field sites. The limitation in terms of taking advantage of existing sustainable transport modes and loss of an undesignated piece of countryside comprising brownfield land, with limited harm to the wider landscape, would be outweighed by the significant social and economic gains identified.

Officers therefore consider that the adverse impacts identified would not significantly and demonstrably outweigh the benefits of the scheme. Nor do specific policies in the framework indicate that the development should be restricted.

### **Recommendation A:**

That, having regard to the environmental information contained in the application, the accompanying Environmental Statement (and addendum), together with proposals for mitigation, subject to the applicant entering into an appropriate legal agreement, within 6 months of the date of the committee resolution to grant planning permission, to secure the provision of/contributions towards: 30% on site affordable housing and market housing mix; education infrastructure, provision of canal basin, SuDS and Foul Water management/maintenance, on site health centre/surgery, public open space provision and maintenance (including sports pitches, pavilion, public art and open space), cycleways, public access, off site highways improvements, travel plan, bus service provision, Community Trust, subject to conditions and subject to referral to the Secretary of State and no receipt of a direction calling-in the application, that permission be GRANTED

**PART 1 - The following conditions relate only to the part of the planning permission granted in outline and references to development in Part 1 means the part of the development subject to the outline element of the permission. In this part 1 a reference to a phase shall mean a phase identified on the phasing plan approved pursuant to condition 7 and reference to a sub phase shall mean part of a phase for which a reserved matters application is submitted for approval:**

1. Condition  
Details of the access, appearance, landscaping, layout and scale (hereinafter called 'the reserved matters') for each phase or sub phase shall be submitted to and approved in writing by the Local Planning

Authority before any development in that phase or sub phase begins and the development shall be carried out as approved.

Reason:

To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

2. Condition

Application for approval of the reserved matters for the first phase or sub phase shall be made to the Local Planning Authority not later than 3 years from the date of this permission. Applications for approval of the reserved matters for the remaining phases and sub phases shall be made within 10 years from the date of this permission.

Reason:

To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

3. Condition

The development hereby permitted shall begin not later than two years from the date of approval of the first of the reserved matters to be approved.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the town and Country Planning Act 1990 (as amended).

4. Condition

Subsequent phases or sub-phases of the development hereby permitted shall be begun before the expiration of 2 years from the date of approval of the last of the reserved matters to be approved in respect of that phase or sub phase.

Reason:

To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the town and Country Planning Act 1990 (as amended).

5. Condition

The plan numbers to which this outline permission relates are:

- Site Local Plan: Drawing No. PL – 01 – Revision B

- Masterplan Land Use Parameter Plan: Drawing No. PL – 04 Revision K
- Masterplan Access Parameter Plan: Drawing No. PL – 05 Revision J
- Masterplan Landscape and Open Space Parameter Plan: Drawing PL-06 revision I
- Masterplan Density Parameter Plan: Drawing No. PL – 07 Revision G.
- Masterplan Building heights Parameter Plan: Drawing No. PL – 08 Revision G

Reason:

In order that the development hereby permitted shall be fully implemented in accordance with the approved plans parameter plans and to accord with Policies D1 and D4 of the Waverley Borough Council Local Plan 2002.

6. Condition

The details referred to in condition 1 for each phase or sub phase shall include insofar as relevant to that phase or sub phase details of the materials and external finishes of the buildings, surfaces for roads/footpaths, earth remodelling, means of enclosure and the parking of vehicles, and the provision of samples of such materials and finishes as required. Development shall be carried out in accordance with the approved details.

Reason:

To enable to the Local Planning Authority to control the development in detail in the interests of amenity in accordance with Policies D1 and D4 of the Waverley Borough Council Local Plan 2002

Phasing

7. Condition

No development shall take place until a phasing plan has been submitted to and approved in writing by the Local Planning Authority. The phasing plan shall include details of the location of the phases of the development and a programme of phasing for the implementation of the development. The development shall be carried out in accordance with the approved phasing plan (and programme of phasing contained therein), which shall contain a mechanism for reviewing and amending the phasing of the development and the programme of phasing.

Reason:

To ensure satisfactory comprehensive development, provision of facilities and services to serve future residents and proper planning of the area, in accordance with paragraph 17 and Section 8 of the NPPF, Policies D1, D4, D13 and D14 of the Waverley Borough Council Local Plan 2002 and Policy SS7 of the Draft Local Plan – Part 1.

### Ecology

8. Condition

The development shall be carried out strictly and fully in accordance with the mitigation set out in Chapter 7 Ecology and Nature Conservation of Environmental Statement and Addendum Environmental Statement, including the detailed biodiversity enhancements and any required translocation site.

Reason

To safeguard the ecological interest of the site in accordance with Policy C11 and D5 of the Waverley Borough Local Plan 2002 and paragraphs 17 and 118 of the NPPF.

9. Condition

No development of a phase or sub phase shall take place until a Landscape and Ecological Management Plan (LEMP) for that phase or sub phase to ensure the appropriate management of existing and proposed habitats in the long term, has been submitted to and approved in writing by the local planning authority. The LEMP shall include methodologies of the sensitive management of both new and retained/enhanced habitat and a landscape, planting and seeding plan (with species list). Replacement native tree and hedgerow planting is sought to exceed any such habitat removed. The development on a phase or sub phase shall be carried out in accordance with the approved details.

Reason

To safeguard the ecological interest of the site in accordance with Policies C11 and D5 of the Waverley Borough Local Plan 2002. This is a pre commencement condition because the matter goes to the heart of the permission.

### Archaeology

10. Condition

No development of a phase or sub-phase shall take place until the applicant has secured the implementation of a programme of archaeological work for that phase or sub-phase in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the Planning Authority.

#### Reason

The development proposed covers a large surface area and it is considered likely that it will affect currently unknown archaeological information. It is important that the site is surveyed and work is carried out as necessary in order to preserve as a record any such information before it is destroyed by the development in accordance with Policy HE15 of the Waverley Borough Local Plan 2002. This is a pre commencement condition because the matter goes to the heart of the permission.

#### Drainage

##### 11. Condition

The development of any phase or sub phase hereby permitted shall not commence until details of the design of a surface water drainage scheme for that phases or sub phase have been submitted to and approved in writing by the planning authority for each development phase.

Those details shall include:

- a) A design that satisfies the SuDS Hierarchy
- b) A design that is compliant with the national Non-Statutory Technical Standards for SuDS, National Planning Policy Framework and Ministerial Statement on SuDS
- c) Evidence that the proposed solution will effectively manage the 1 in 30 & 1 in 100 (+CC% allowance for climate change storm events, during all stages of the development (Pre, Post and during), associated discharge rates and storages volumes shall be provided. This shall include confirmation of Greenfield and current brownfield discharge rates. as per the principles detailed in "Dunsfold Park a New Surrey Village, Drainage Strategy Novembers 2016".
- d) A Drainage phase plan, that details how each phase of development will be drained
- e) A finalised drainage layout plan that details the location of each SuDS element, pipe diameters and their respective levels
- f) long and cross sections of each SuDS element
- g) An impervious area plan



h) Details of how the Sustainable Drainage System will be protected and maintained during the construction of the development

i) Details of the proposed maintenance regimes for each of the SuDS elements and details of who is responsible for their maintenance

Reason:

To ensure that the drainage system has been designed to fully accord with the requirements of the National SuDS Technical Standards and to avoid adverse environmental impact upon the community and to accord with Policies D1 and D4 of the Waverley Borough Local Plan 2002. This is a pre commencement condition because the matter goes to the heart of the permission.

12. Condition

Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer for the relevant phase, must be submitted to and approved by the Local Planning Authority to demonstrate that the Sustainable Urban Drainage System has been constructed as per the agreed scheme.

Reason:

To ensure that the Sustainable Drainage System has been constructed as agreed and to avoid adverse environmental impact upon the community and to accord with Policies D1 and D4 of the Waverley Borough Local Plan 2002.

13. Condition

No development of a building pursuant to a reserved matters application shall commence until a foul drainage strategy has been submitted to and approved in writing by the local planning authority. The strategy shall include details of delivery for the foul drainage works. No occupation of any building constructed as part of the development will be permitted until the foul drainage strategy is approved and thereafter the development shall only be implemented in accordance with the approved strategy.

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 and to comply with Policy D1 of the Waverley Borough Council Local Plan 2002.

14. Condition

No occupation of a building shall take place until a drinking water strategy has been first submitted to and approved in writing by the Local Planning Authority. The provision of drinking water shall only be in accordance with the approved strategy.

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 and to comply with Policy D1 of the Waverley Borough Local Plan 2002.

Village Centre / Community Provision

15. Condition

Prior to or concurrently with the submission of any Reserved Matters application(s) for the village centre, details of the nature, scale and extent of the D1 Use Class floorspace within the village centre, shall be submitted to and approved in writing by the Local Planning Authority. Any reserved matters application(s) for the village centre shall accord with these approved details and be carried out in accordance with the approved phasing plan secured under Condition 7. The development shall be carried out in accordance with the approved details.

Reason:

To provide appropriate recreational facilities for the residents of dwellings in accordance with Section 8 of the National Planning Policy Framework and Policy SS7 of the draft Local Part 1.

16. Condition

Prior to or concurrently with the submission of any Reserved Matters application(s) for the village centre, a programme of delivery for the Village Centre element of the development must be submitted to and approved in writing by the Local Planning Authority. The programme of delivery shall identify and justify the timing of completion of the proposed village centre which should comprise a mix from A1, A2, A3, A4, A5 and D1 uses and not exceed a total quantum of floorspace of 3,750 square metres (excluding any D1 education uses):

The reserved matters application for the village centre shall accord with these approved details and be carried out in accordance with the approved phasing plan secured under Condition 7. The development shall be carried out in accordance with the approved details

Reason:

To ensure the provision of local facilities for residents of the development and in the interests of preserving the vitality and viability of existing town and village, in accordance with paragraph 58 and Sections 2 and 8 of the National Planning Policy Framework and Policy SS7 of the draft Local Part 1.

### Highway works and access

17. Condition

With the exception of the construction of the new spine road access from the end of the runway to the A281 and junction with the A281 no other development, apart from enabling or mitigation works in accordance with a phasing plan secured under Condition 7, shall take place until the new spine road access from the eastern end of the runway to the A281 and a roundabout junction with the A281, to include cycle, and pedestrian priority, in general accordance with either drawing numbered VD15289-SK-057A or VD15289-SK-061 has been constructed to the satisfaction of the Local Planning Authority

Reason:

The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

18. Condition

With the exception of the construction of the new spine road access from the end of the runway to the A281 and junction with the A281 no other development, apart from enabling or mitigation works in accordance with a phasing plan secured under Condition 7, shall take place until the new spine road access from the eastern end of the runway to the A281 and a roundabout junction with the A281, to include cycle, and pedestrian priority, in general accordance with either drawing numbered VD15289-SK-057A or VD15289-SK-061 has been constructed.

Reason:

The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

19. Condition

With the exception of the construction of the new spine road access from the end of the runway to the A281 and junction with the A281, no

development shall take place until a scheme to deliver the following works:

- The existing vehicular access at Stovolds Hill, will be closed to vehicular traffic, with the exception of buses and emergency vehicles
- The existing vehicular access at Compass Gate, will be restricted so as to allow access to all vehicles other than heavy goods vehicles
- The existing vehicular access at High Loxley Road, will be closed to vehicular traffic, but kept open for pedestrian, footway and cycleway and Bridleway traffic. The existing vehicular access at Benbow Lane, will be closed to vehicular traffic, but kept open for pedestrian, and Bridleway footway and cycleway traffic.
- The existing vehicular access at Tickner's Heath, will be restricted so as to allow only bus and emergency access

have been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried in accordance with the approved detail.

Reason:

The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

## 20. Condition

Within 12 weeks of the opening of the new road access and junction to the A281 to traffic:

- The existing vehicular access at Stovolds Hill, will be closed to vehicular traffic, with the exception of buses and emergency vehicles
- The existing vehicular access at Compass Gate, will be restricted so as to allow access to all vehicles other than heavy goods vehicles
- The existing vehicular access at High Loxley Road, will be closed to vehicular traffic, but kept open for pedestrian, footway and cycleway and Bridleway traffic. The existing vehicular access at Benbow Lane, will be closed to vehicular traffic, but kept open for pedestrian, and Bridleway footway and cycleway traffic.

- The existing vehicular access at Tickner's Heath, will be restricted so as to allow only pedestrian, cycle, horse, bus and emergency access

All in accordance with the requirements of the Highway Authority and to the satisfaction of the Local Planning Authority.

Reason:

The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

21. Condition

With the exception of the main spine road and access roundabout, and existing/diverted public rights of way, there shall be no other means of vehicular/pedestrian/cycle access from the development hereby approved to Guildford/Horsham Road, A281 unless permitted by a further planning permission.

Reason:

The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

22. Condition

No construction works forming part of the development shall commence until a Construction Transport Management Plan, to include details of:

- (a) parking for vehicles of construction site personnel, construction site operatives and construction site visitors
- (b) loading and unloading of plant and materials for the construction of the development
- (c) storage of plant and materials for the construction of the development
- (d) programme of construction works (including measures for construction traffic management)
- (e) HGV deliveries for construction and hours of construction operation
- (f) construction vehicle routing
- (g) measures to prevent the deposit of materials on the highway
- (h) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused by construction traffic
- (i) on-site turning for construction vehicles

has been submitted to and approved in writing by the Local Planning Authority. The construction of the development shall be carried out in

accordance with the approved Construction Transport Management Plan.

Reason:

The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

23. Condition

Prior to commencement of any phase or sub phase of a reserved matters application for residential development, full details of the parking provision for each dwelling within that phase or sub phase must have been submitted to, and approved in writing, by the Local Planning Authority. The development of that phase or sub phase shall thereafter be carried out in accordance with the approved details.

Reason:

In the interests of visual and residential amenity and to ensure that an appropriate level of parking provision is provided for future residents, in accordance with Policies D1 and D4 of the Waverley Borough Local Plan, the NPPF and Waverley Borough Council's Parking Guidelines 2013. This is a pre-commencement condition as this matter goes to the heart of the permission.

24. Condition

Prior to commencement of development, a scheme detailing the network of footpaths, bridleways, pedestrian paths, cycle paths, footways and cycle ways linking all external accesses / desire lines within and across the site, shall be submitted to, and approved in writing by the Local Planning Authority. Once constructed in accordance with the scheme, they shall thereafter be permanently maintained to the satisfaction of the local Planning Authority for their designated purpose to provide uninterrupted public rights of way and usage.

Reason:

The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users, in accordance with the NPPF and Policy M2 of the Local Plan 2002.

25. Condition

Before occupation of 100 residential units constructed pursuant to the planning permission, improvements to the signalised junction of

A281/B2130 Elmbridge Road, to include provision for cyclists and buses in general accordance with drawing number 110047/A/23 shall be carried out.

Reason:

The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users, in accordance with the NPPF and Policy M2 of the Local Plan 2002.

26. Condition

Before occupation of 100 residential units constructed pursuant to the planning permission, the provision of a right turn lane at the junction of A281/Barrihurst Lane, in general accordance with drawing number 110047/A/2RevA shall be carried out

Reason:

The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users, in accordance with the NPPF and Policy M2 of the Local Plan 2002.

27. Condition

Before occupation of 100 residential units constructed pursuant to the planning permission, the provision of Rights of Way route improvements to construct a Dunsfold Park to Cranleigh Cycleway and a Dunsfold Park to Dunsfold Village Cycleway in general accordance with Drawing VD15289-SK60 and Drawing 110047/A/24 shall be carried out.

Reason:

The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users, in accordance with the NPPF and Policy M2 of the Local Plan 2002.

28. Condition

Before occupation of 500 residential units constructed pursuant to the planning permission, the provision of traffic signals at the junction of Station Road/Snowdenham Lane/ A281 Bramley, to include provision for cyclists and bus priority, in general accordance with drawing number 11047/A/22 shall be carried out

Reason:

The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users, in accordance with the NPPF and Policy M2 of the Local Plan 2002.

### Masterplan

#### 29. Condition

Prior to the approval of the first reserved matters application for a building, a Masterplan Document, detailing design principles and character areas (including density, scale, car parking) for the entire site shall be submitted to and approved in writing by the Local Planning Authority. All subsequent reserved matters applications must demonstrate general compliance with the approved masterplan. The document shall describe the procedure to allow for review and amendment of the Masterplan Document.

The development shall thereafter be carried out in general accordance with the approved Masterplan.

#### Reason

To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

### Play and Sport Provision

#### 30. Condition

Prior to the approval of the first reserved matters application for residential development, an Open Space and Sports Strategy must be submitted to and approved in writing by the Local Planning Authority. The Strategy should identify the delivery of public open space, sports and leisure pitches and buildings, which should be largely in accordance with the Fields in Trust Standard, the provision of the Canal Basin and Public Art. The development of the open space and sports areas shall be delivered in accordance with the approved details and be delivered in accordance with the approved phasing plan secured under Condition 7.

#### Reason:

To ensure the adequate on-site provision of public open and sports provision for future residents, in accordance with paragraph 17 and Section 8 of the National Planning Policy Framework, Policies D1 and



D4 of the Waverley Borough Council Local Plan 2002 and Policy SS7 of the Draft Local Plan – Part 1.

31. Condition

Prior to commencement of development of any phase or sub phase of the development which includes sports facilities there shall first be submitted and agreed in writing by the Local Planning Authority details of:

- The design, specification, siting and layout of pitch provision and sports facilities for that phase or sub phase.

The development of that phase or sub phase shall be carried out in accordance with the approved details for that phase or sub phase.

Reason

The application was made for outline planning permission and is granted to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 and Article 3(1) of the Town and Country Planning (General Development Procedure) Order 1995.

### Contaminated Land

32. Condition

Prior to commencement of development in each phase or sub phase other than that required to be carried out as part of an approved scheme of remediation, unless otherwise agreed in writing by the Local Planning Authority, points 1 to 3 below shall be complied with in respect of that phase or sub phase. If unexpected contamination is found after development has begun, development must be halted in that area within that phase or sub phase affected by the unexpected contamination to the extent specified by the Local Planning Authority in writing until point 4 has been complied with in relation to that contamination

1. Site Characterisation

An investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the phase or sub phase, whether or not it originates on the phase or sub phase. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The

written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include:

(i) a survey of the extent, scale and nature of contamination including unexploded ordnance risks;

(ii) an assessment of the potential risks to:

- human health,
- property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
- adjoining land,
- groundwaters and surface waters,
- ecological systems,
- archeological sites and ancient monuments;

(iii) an appraisal of remedial options, and proposal of the preferred option(s).

This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

## 2. Submission of Remediation Scheme

A detailed remediation scheme to bring the phase or sub phase to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

## 3. Implementation of Approved Remediation Scheme

The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development of that phase or sub phase other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works. Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.

## 4. Reporting of Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development on a phase or sub phase that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of point 1 of this condition, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of point 2 of this condition, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with point 3 of this condition.

Reason

In order to prevent contamination and to accord with Policy D1 of the Waverley Borough Local Plan 2002.

Air Quality

33. Condition

Prior to commencement of development in each phase or sub phase of a reserved matters application for residential development a scheme detailing the provision of Electric Vehicle Charging Points (EVP's) within that phase or sub phase shall be first submitted to and approved in writing by the Local Planning Authority.

Reason

To protect the air quality for the existing and future receptors in the locality and to accord with Policies D1 and D4 of the Waverley Borough Council Local Plan 2002.

34. Condition

Prior to commencement of development on a phase or sub phase a site management plan for the suppression of mud, grit, dust and other emissions during any deconstruction and construction of that phase or sub phase should be submitted to and approved in writing by the Planning Authority. The approved mitigation proposals in the Air Quality Construction Assessment should form the basis for the site plan for each phase or sub phase. Development on a phase or sub phase shall accord with the Site Management Plan for that phase or sub phase.

Reason

To protect the air quality for the existing receptors in the locality and to accord with Policies D1 and D4 of the Waverley Borough Council Local

Plan 2002. This is a pre-commencement condition as this relates to the construction process.

35. Condition  
No burning of any construction materials on site shall be permitted

Reason

To protect the air quality for the existing receptors in the locality and to accord with Policies D1 and D4 of the Waverley Borough Council Local Plan 2002.

### Sustainability

36. Condition  
Prior to the commencement of a non-residential building a BREEAM scheme to achieve BREEAM Very Good shall be submitted in writing for approval by the Local Planning Authority for that building. The scheme shall include a lower level of BREEAM along with a justification if a building cannot technically or viably achieve BREEAM Very Good. The approved scheme shall be implemented for that building.

Within six months of occupation of the building a final Code Certification shall be issued certifying that the approved Code Level has been achieved.

Reason:

In order to provide a highly efficient and sustainable form of development and to accord with the NPPF.

**PART 2 - The following conditions relate only to the part of the planning permission granted in detail (change of use of existing buildings on site 36,692 square metres of B1, B2 and B8 Use Classes) and references to development in Part 2 means the part of the development subject to the detailed element of the permission.**

37. Condition  
The effect of Section 91 of the Town and Country Planning Act 1990 (as amended) is that the development for which permission is hereby granted shall be begun not later than the expiration of three years beginning with the date of this permission.

38. Condition

The plan numbers and retention schedule to which this permission relates are:

- Site Local Plan: Drawing No. PL – 01 – Revision B
- Building Demolition and Retention Plan: Drawing No. PL – 03 Revision D
- Dunsfold park Demolition and Retentions Table

The development shall be carried out in accordance with the approved plans and Demolition and Retention Tables. No material variation from these plans shall take place.

**Reason**

In order that the development hereby permitted shall be fully implemented in complete accordance with the approved plans and to accord with Policies D1 and D4 of the Waverley Borough Local Plan 2002

**39. Condition**

The buildings (as shown on the 'Building Demolition and Retention Plan: Drawing No. PL – 03 Revision D') shall not be used for any purpose other than for purposes falling within Classes B1(b) and B1(c) Business use; B2 General Industry and B8 Storage and Distribution use as defined within the Town and Country Planning (Use Classes) Order 1987 (as amended) and the Town and Country Planning (General Permitted Development) Order 2015, or any other orders revoking these Acts.

**Reason:**

To allow the Local Planning Authority adequate control over the proposed uses on the site and to ensure that they are retained for their intended purposes, in accordance with Policies D1 and D4 of the Waverley Borough Council Local Plan 2002 and the NPPF.

**40. Condition**

No materials, including products or parts, crates, packing materials or waste shall be stacked or stored externally except within the area defined as 'Commercial' on drawing PL-04 revision K 'Masterplan: Land Use Parameter Plan'.

**Reason:**

To protect the character and amenities of the area and to accord with Policies D1 and C2 of the Waverley Borough Local Plan 2002.

41. Condition
- Prior to the new spine road access from the end of the runway to the A281 and the junction with the A281 being open to traffic and save as provided for below, there shall be a limit of no more than 3,348 total road vehicular movements (excluding pedal and motor cycles) per day allowed to gain access to any part of the airfield. Upon commencement of construction of the new spine road access or the junction with the A281, and during their construction, the limit shall increase to 3,850 total road vehicular movements (excluding pedal and motor cycles) per day to allow for the related construction traffic. Upon the opening of the new spine road to access to traffic no limit on road vehicular movements shall apply on the application site or in relation to access to the application site. For the purpose of this condition, a vehicular movement shall include a movement into or out of the site.

Reason

To control the likely traffic generated by the existing and proposed uses do not result in unacceptable harm to the amenity of surrounding residential property, in the interests of highway safety and sustainability reasons due to the isolated location of the site in accordance with policies M1, M2, D1 and D4 of the Waverley Borough Local Plan and Paragraph 17 and Section 4 of the NPPF.

**Informatives**

1. The submitted masterplan is indicative only and has not been fully assessed as part of this outline application.
2. The granting of planning permission does not permit the alteration/obstruction of any part of a public right of way in any form.
3. The applicant is advised that the design and layout of the sports facilities including pitches should comply with the relevant industry Technical Design Guidance, including guidance published by Sport England, National Governing Bodies for Sport.
4. If the applicant proposes to undertake structural works to an ordinary watercourse then consent is required forms are available on request from [SuDS@surreycc.gov.uk](mailto:SuDS@surreycc.gov.uk). As the applicant is proposing to discharge into the canal the applicant needs to ensure that the Wey and Arun Canal Trust give permission(s) for this and that the receiving waterbody is in condition to receive these flows.

5. Within the flood risk assessment the applicant recommends that treatment will be in place before water is discharged into the Wey and Arun Canal. The applicant has not included detail on what this shall include. We recommend that details on treatment of water being discharged from car park areas are included with in the Surface Water Management Scheme and discussions are held with the Wey and Arun Canal Trust regarding discharge to this watercourse.
6. It is recommended that the developer attain Secured by Design (SBD) level 1 certification, for the whole site, residential, commercial, educational and open areas/parkland.
7. Conditions 17, , 24, 25, 26, 27 and 28 and Section 106 Heads of Terms item 7 shall be delivered through the completion of Section 278 Agreements with the County Council.
8. Design standards for the layout and construction of access roads and junctions, including the provision of visibility zones, shall be in accordance with the requirements of the County Highway Authority.
9. There would be no objection in principle from the highway point of view to the proposed development following the completion of the proposed means of access and highways improvements.
10. The Highway Authority has no objection to the proposed development, subject to the above conditions but, if it is the applicant's intention to offer any of the roadworks included in the application for adoption as maintainable highways, permission under the Town and Country Planning Act should not be construed as approval to the highway engineering details necessary for inclusion in an Agreement under Section 38 of the Highways Act 1980.
11. All bridges, buildings or apparatus (with the exception of projecting signs) which project over or span the highway may be erected only with the formal approval of the Head of Transportation under Section 177 or 178 of the Highways Act 1980.
12. The permission hereby granted shall not be construed as authority to carry out works on the highway. The applicant is advised that a licence must be obtained from the Highway Authority Local Transportation Service before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway.

13. When access is required to be 'completed' before any other operations, the Highway Authority will normally agree that wearing course material and in some cases edge restraint may be deferred until construction of the development is virtually complete, provided all reasonable care is taken to protect public safety.
14. A pedestrian inter-visibility splay of 2m by 2m shall be provided on each side of the access, the depth measured from the back of the footway and the widths outwards from the edges of the access. No fence, wall or other obstruction to visibility between 0.6m and 2m in height above ground level shall be erected within the area of such splays.
15. The Highway Authority advise that the proposed estate road(s) are of insufficient public utility to warrant adoption as highway maintainable at public expense.
16. A standard fee may be charged for input to, and future monitoring of, any Travel Plan.

**Recommendation B:**

That, in the event that the requirements of recommendation A are not met, that permission be REFUSED for the following reasons:

1. Reason  
The applicant has failed to enter into an appropriate legal agreement to secure a programme of highway improvement works to mitigate the impact of traffic generated by the development, bus service provision in perpetuity and associated funding and governance, Travel Plan and Travel Plan co-ordinator. As such, the proposal would fail to effectively limit the impacts of the development on existing infrastructure. The application therefore fails to meet the transport requirements of the National Planning Policy Framework 2012 and Policies M2 and M14 of the Waverley Borough Local Plan 2002.
2. Reason  
The applicant has failed to enter into an appropriate legal agreement to secure contributions towards education infrastructure, provision of canal basin, SUDS and Foul Water management/maintenance, on site health centre/surgery, public open space provision and maintenance (including sports pitches, pavilion, public art and open space), cycleways, public access. The proposal therefore conflicts with



Policies D13 and D14 of the Waverley Borough Local Plan 2002 and paragraphs 7 and 17 of the NPPF.

3. Reason

The applicant has failed to enter into an appropriate legal agreement to secure the provision of affordable housing within the meaning of the NPPF or an appropriate market housing mix, appropriate to meet Waverley Borough Council's housing need. The proposal would therefore fail to create a sustainable, inclusive and mixed community, contrary to the requirements of paragraph 50 of the NPPF.

**APPENDIX 1 : Schedule of all existing buildings describing those to be demolished along with those to be retained and their proposed permanent use**

**Buildings to be Demolished**

Bldg #	Description (BAE name)	Size( sqm)	B1 use	B1 and/or B2 and/or B8 use	B1c and/or B2 and/or B8	B8	Ancillary - whole site	Ancillary - on site staff	Not part of temporary application
10	Haz Chem Store	3.0				3.00			
11	Avgas Bowser Garage	47.8			47.8				
14	Plant Room No1	13.0					13.0		
16	Toilet Block/Armoury Plant Room	54.9					54.9		
17	Armoury Store Workshop	421.5			421.5				
18	Garages	120.1			120.1				
20	Admin Portakabin (A) (temp Jigsaw)	1,052.5							1,052.5
21	Portakabin Product Support (B) ( temp Jigsaw)	877.2							877.2
22	Portakabin Advice Centre	409.9		409.9					
24	Gas Governor Building	15.1					15.1		
25	South Side T2A - East Portakabin	31.4	31.4						
26	South Side T2A - West Portakabin	31.4	31.4						
27	Indian Portakabin	31.4	31.4						
28	Portakabin	57.6	57.6						
30	Portakabin	57.6	57.6						
47	Sub-Stn H	7.4					7.4		
58a	Stores	21.8				21.8			
58b	Stores	21.4				21.4			
58c	Stores	21.5				21.5			

						5			
58d	Stores	21.5				21.5			
58e	Stores	21.4				21.4			
58f	Stores	21.6				21.6			
58g	Stores	21.6				21.6			
58h	Stores	21.5				21.5			
58j	Stores	21.5				21.5			
58k	Stores	21.5				21.5			
62	62 Switchroom G	38.7					38.7		
63	Flamestore Plant Room	24.8					24.8		
77	Ammunition Store North	49.1			49.1				
85	Battery Shop	63.8			63.8				
88	Air Craft Handlers Portakabin	24.9		24.9					
89	Personnel Officers and Open Learning Centre	505.2		505.2					
91	Training School	239.4		239.4					
92	Training Centre Plant Room 19	65.6			65.6				
95	Training School Garage	37.2			37.2				
98	Fire Station Pump Room	12.3					12.3		
100	L Shape Portakabin	256.7	256.7						
104	EETS Generator Room	15.2					15.2		
111	Marley Engine Pen	12.0					12.0		
113	Tack Store	25.1			25.1				
114	Clay Club and Sub Station	13.3			13.3				
115	Flight Line Unit	30.2		30.2					
116	Tractor Store	329.3			329.3				

					3				
118	RAC Post	57.1			57.1				
119	Tractor Shed (Agricultural)	8.1				8.1			
125	Air Traffic Control Ground Floor	199.8		199.8					
125	Air Traffic Control First Floor	29.1		29.1					
126	Generator Station	28.5			28.5				
128	Agricultural Store	120.0			120. 0				
129	Agricultural Store	120.0			120. 0				
130	Radio/Trans Hut	9.9							
131	Direction Finder Building Aerial	20.0							
137	Toilet Block	29.7					29. 7		
137a	Sub-Stn C(Compound)	20.8					20. 8		
138	Gym Club	115.3			115. 3				
138a	Sub-Stn D	15.2					15. 2		
139	Sports & Social Club	440.3			440. 3				
140	Blister Hanger	849.8			849. 8				
141	Toilet Block	16.4					16. 4		
142	Observation Hut	4.8							
143	Maintenance Store	119.8			119. 8				
144	Main Armoury Store(South Side)	20.5					20. 5		
145	Sub-Stn B	29.5					29. 5		
149	Squash Court	208.0						208 .0	
150	Ex Paint Store	48.9					48. 9		
151	AQD Archives	29.7	29.7						

151a	Shed rear of 151	8.6		8.6					
152	Sports Club Shower Block	57.4						57.4	
153	Sports Club Committee Room	57.3			57.3				
154	Sports Club Golf Hut	19.7			19.7				
155	Sports Club Bowling Alley	56.8			56.8				
156	Sports Club Storage Garage (East)	38.5				38.5			
157	Sports Club Storage Garage (West)	38.5				38.5			
158	Sports Club Marley Garage	21.5				21.5			
	<b>TO BE DEMOLISHED</b>	<b>8,029.2</b>	<b>496.0</b>	<b>1,447.2</b>	<b>3,157.3</b>	<b>421.4</b>	<b>277.5</b>	<b>265.4</b>	<b>1,929.7</b>

**Buildings to be Retained and their Proposed Permanent Use (all uses are the same as currently granted through temporary consent)**

Bldg #	Description (BAE name)	Size (sqm)	B1 use	B1 and/or B2 and/or B8 use	B1c and/or B2 and/or B8 use	B8 use	Ancillary - whole site	Ancillary - on site staff	General - whole site
9	Police Main Gate Security	107.7	107.70						
10a	Portakabin in Car Park	9.8	9.8						
13	Kestrel Plant Room No2	34.0					34.0		
	Sub-Stn A2	30.6					30.6		
15	Magnetic Compass Hut	7.2		7.2					
	Sand Store	14.7							14.7
19	Kestrel Building and Works Labs	1,562.5			1,562.5				

19a	Gas storage area	7.5					7.5		
23	Gas Bottle Store	10.0				10.0			
29	Portakabin	57.6	57.6						
31	Bird Control Unit	13.4					13.4		
38	Toilet Block/Plant Room	58.3					58.3		
39	Transport/Rest Room	59.1	59.1						
40	Compactor Shed	27.1					27.1		
	Oil Store	2.8							2.8
41	Transport Dept	314.9				314.9			
42	Goods Inwards	350.8				350.8			
43	Commercial Building	1,373.4				137.34			
44	Logistics Centre	763.4				763.4			
44a	Old Gas Compound	71.2					71.2		
45	Maintenance Store	302.7				302.7			
46	Works Engineering Property Services	913.3				913.3			
48	Fire station Boiler Generation Room	61.9		61.9					
49	Safety Equipment Room Extension	20.8					20.8		
50	Safety Equipment/Coppersmiths Plant Room	10.7						10.7	
51	Bay 2 Plant Room	33.3						33.3	
52	Conference Centre	364.8	364.8						
53	Store Building No22	301.7				301.7			
54	Store 22 Boiler House - Maintenance Store Plant Rm 8	18.0						18.0	

55	Dingy Wash Port	9.6					9.6		
56	Administration Building Cashiers Presentation Theatre	558.1	558.1						
57	T2A Hangar & Toilet Block GIA	3,044.3			304.3				
	Sub-Stn adj to buildings 58a-k	39.3							39.3
60	Store	24.6				24.6			
64	Store Portakabin	175.2			175.2				
64a	Sub-Stn G(Adj 64)	28.1					28.1		
65	Deluge Sprinkler Plant Room (East) & Boiler House	172.4					172.4		
66	Paint Shop Boiler House and Generator Room	102.3					102.3		
67	Paint Shop	1,032.6			1,032.6				
68	Production Hangar	9,192.4			9,192.4				
69	Ejector Seat Store	20.2				20.2			
70	Paint Store	10.9				10.9			
71	Restaurant and shops	1,211.5						1,211.5	
71a	Main Sewage Pump Station	10.5							10.5
73	Paint Shop Lockers/Shower Building	26.3					26.3		
74	Firestation (Ground Floor & First Floor GIA)	535.3		535.3					
75	Pilots Building	473.8	473.8						
76	Saudi Hawk Building	217.3	217.3						
78	Paint Shop Office	26.3	26.3						
	Car Port Adj 79/51 (open- fronted)	9.6							9.6
79	Hydraulic Rig Service	68.6		68.6					

80	Coppersmiths	73.4		73.4					
81	Safety Equipment Building (First Floor Offices NIA)	404.6		404.6					
82	Plant Room West Deluge Sprinklers (18)	62.4					62.4		
82a	Plant Room West Deluge Sprinklers (18a)	16.6					16.6		
83	Store 42	215.1			215.1				
84	Photographics/Instrumentation	200.1			200.1				
86	T2B Hangar	3,692.5			3,692.5				
86a	Storage Building	418.0					418.0		
87	Flight Test	1,439.2	1,439.2						
90	Portakabin Adj 96	56.4					56.4		
93	Emergency Building	127.8					127.8		
96	Toilets	34.9					34.9		
96a	Sub-Stn F2	37.1					37.1		
97	AAC Tempest Hangar	663.6			663.6				
99	Plant Room T2B Hangar	53.0					53.0		
99a	Sub-Stn E	18.7					18.7		
	Plant Room 23	3.3							3.3
101	Sub-Station F3	15.2					15.2		
105	EETS Building	247.1	247.1						
106	Systems Engineering	3,263.3	3,263.3						
107	Harrier Pen (Engine No1)	13.1		13.1					
107a	Adj Observation Building	8.7		8.7					
108	New Hawk Engine Pen	296.5		296.5					



	(No2) Harrier Test Site								
108a	Adj Observation Building	3.6		3.6					
109	Old Hawk Pen (Engine Pen No3)	66.4		66.4					
109a	Adj Observation Building	3.6		3.6					
110	Store	24.6					24.6		
112	Honeymeats Cottage	71.9							71.9
117	rac post	13.6					13.6		
120	Hawk Pen Building	807.4				807.4			
	Shed off Runway 2	4.8							4.8
	Shed off Runway 3	4.4							4.4
	Transmitter (Portakabin)	9.9							9.9
	Receiver (Concrete rendered)	20.0							20.0
123	Canada House	157.3							157.3
124	Arming Hut	8.0				8.0			
	Magnetism	11.5							11.5
133a	Fuel Store Sheds	15.0				15.0			
133b	Fuel Store Sheds	15.0				15.0			
133c	Fuel Store Sheds	15.0				15.0			
133d	Fuel Store Sheds	15.0				15.0			
133e	Fuel Store Sheds	15.0				15.0			
134	Compass Gate (2nd Entrance)	9.9					9.9		
135	Primeads Cottage	137.4							137.4
148	gun obvs building	9.8					9.8		
	TO BE RETAINED	36,692.1	6,824.1	1,542.9	24,098.5	1,466.1	1,051.6	1,211.5	497.4

Appendix 2

**APPENDIX 2: Copy of Secretary of State and Inspector's decision letter in relation to the WA/2008/0788 appeal**

**APPENDIX 3: Copy of County Highway Authority response**