

RESPONSES FROM LAND OWNERS, AGENTS OR DEVELOPERS:

ALEHOUSE:

From Alan Pearce.

Thank you very much for your email and the attached notification of consultation. I was in the process of writing to you to update you following receipt of the pre-application response from Waverley Borough Council.

I can confirm that Cognatum Estates has always wanted to work with you and in accordance with your emerging Neighbourhood Plan and so we were pleased to hear about the progress that has been made at the recent Parish Council meetings and are equally pleased to see the attached consultation.

Waverley Borough Council have also confirmed that they would want any scheme to be consistent with the Neighbourhood Plan and we would want to support the Steering Group and Parish Council as the Neighbourhood Plan progresses. Therefore if you require any further information on the proposals we would be delighted to provide this and if you have any comments or feedback from the consultation event then we would be happy to listen. For example, are there any priorities in the village that Cognatum Estates can assist with e.g. clearing and maintaining the public path behind the site, landscape works to the green by the pub, local tree surgery work etc. Cognatum, Estates as a developer but a site manager want to contribute to and be part of the village.

There was general support from Waverley about the use, the architecture and quantity and we felt that the scheme would be supported if the "in principle" issue can be resolved i.e. that the site is allocated in the Neighbourhood Plan. We feel that the site offers the best opportunity to help deliver the remaining 32 new homes you require and note that the consultation document identifies the site as a suitable option along with four other sites. The number of homes planned remains at 10 and so is consistent with your assessment.

Also, if it would be helpful (covid permitted), Cognatum Estates have offered to arrange for a site visit for any of the Steering Group team to other Cognatum Estate developments if this would be helpful to appreciate the quality of the developments they are responsible for. If this would be of interest please let me know and I can arrange this.

Keep safe.

Kind Regards,

Alan Pearce
Managing Director
BA (Hons) BTP (Dist) MRTPI



RESPONSE ON BEHALF OF LANDOWNER OF DNP2 (COOMBEBURY) TO DUNSFOLD NEIGHBOURHOOD PLAN: SITE SELECTION FOR HOUSING

Waverley Borough Council adopted the Local Plan Part 1: Strategic Policies and Sites (LPP1) in February 2018, now over 3 years ago.

The Local Plan Part 1: Strategic Policies and Sites (LPP1) sets out the Council's spatial framework for delivering the development up to 2032.

Policy ALH1 (The Amount and Location of Housing) requires the Council to make provision for at least 11,210 net additional homes in the period from 2013 to 2032 (equivalent to at least 590 dwellings a year) and each parish is allocated a minimum number of new homes to accommodate during the Plan period and Dunsfold must accommodate a minimum of 100 new dwellings (not including Dunsfold Aerodrome).

The emerging Local Plan Part 2 (LPP2) will include site allocation and Development Management Policies. However, in Dunsfold it is anticipated at the emerging Neighbourhood Plan will allocate sites in accordance with the provisions of the Localism Act 2011.

It is understood that 68 dwellings have been delivered in Dunsfold during the Local Plan period and emerging Neighbourhood Plan will therefore need to allocate sites to accommodate at least 32 dwellings.

Dunsfold Neighbourhood Plan Site Assessment Report March 2021 Draft V8a

We welcome the opportunity to respond with our comments on the latest communication, as well as the published Site Assessment Report by the deadline on 12 April 2021.

In March 2021 the Dunsfold Neighbourhood Plan Steering Group published a 'newsletter' explaining the progress of the Neighbourhood Plan, and disclosing that, having reviewed 22 sites, they had settled on a shortlist of 5 sites, with 2 others to be "taken into consideration".

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It is understood that the 22 sites that have been reviewed were submitted to the Parish Council for consideration in 2018 (20 sites) and 2019 (2 sites). Two sites, DNP6 and DNP11 were subsequently withdrawn and DNP17 has been granted Planning Permission. However, due to the time delay from the 'call for sites' exercise and this recent publication, it is not clear if all the other sites still remain 'available' for development.

The 'deliverability' of the sites taken forward in the Neighbourhood Plan is fundamental and the National Planning Policy Framework states the following:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years."

The Parish Council will be aware of the current planning application at the site DNP2 for the erection of 21 dwellings (including 8 affordable) together with associated access parking and landscaping, planning application ref: WA/2021/0413.

It is therefore considered that the site is deliverable and can come forward without delay. The site also proposed the delivery of 8 much needed affordable homes.

It is noted that at the end of the Stage One process 9 sites were considered by AECOM as potentially suitable (green and amber RAG rated) and 11 sites were considered inappropriate (red RAG rated). At this stage, site DNP2 was considered potentially suitable (amber RAG rated).

In relation to Stage Two process, it is understood that The Steering Group developed a set of 10 Dunsfold Parish site selection principles against which all potential development sites (housing and employment) could be considered.

The newsletter sets out that of the 22 submitted sites, five were considered suitable by the Steering Group and two are for consideration but not recommended as suitable by the Steering Group, as set out below.

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Out of 22 sites submitted, five were considered suitable by the Steering Group:

Site ref.	Name	Notes	Number of houses
DNP1	Alehouse Field	Behind The Sun Inn, specialist housing for aged over 55: Close to the village centre but also close to six listed buildings.	10
DNP3	Wetwood Farm	On Chiddingfold Road, this is the site of a disused poultry farm. Permission has already granted for five dwellings.	7
DNP8	The Orchard	On Chiddingfold Road, this development would be part of the redevelopment of the business hub.	4
DNP18	Binhams Lea	Site of disused garages, off Binhams Meadow.	2
DNP21	The old School and playing field	These sites are owned by the Diocese and Surrey County Council respectively. Any development will be expected to provide an amenity to the village to compensate for the loss of the school (yet to be agreed).	12

The following sites are for consideration but not recommended as suitable by the Steering Group:

DNP2	Coombebury	North of and adjacent to Gratton Chase. The development is not to exceed 12 dwellings, and to include considerable landscaping on the eastern boundary. It is considered that development here would risk further pressure to the north. Currently there is a planning application for 21 houses here.	12
DNP20	Springfield	On the Alfold Road, behind the recently completed affordable housing, allowed as a Rural Exception. The field is good agricultural land, is remote from the village, has poor pedestrian access and is just 410 metres from Dunsfold Park.	32

We are of the opinion that Site DNP2 is suitable for development and we disagree with the Parish Council's latest assessment shown on the following page. In order to demonstrate the inconsistency in the latest assessment, in some areas we have also considered the assessment of DNP21 - The Old School and Playing Field which is considered suitable for 12 houses.

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Site Name:	Coombebury
Site Reference:	DNP2
Assumed Dwelling Capacity:	19 (based on landowner's submission)
Site Area:	0.99
Density:	19.2 dph.

Site Selection Principle	Summary of Assessment	RAG Rating
S1: Scale and Density	The assumed dwelling capacity is above the major development (10 dwelling) threshold. The assumed density is above 15 dpa.	Yellow
S2: Land Use	The site is greenfield and would not result in the loss of employment space. Development on the site would not result in the loss of currently active agricultural land. The land is a woodland plantation.	Red
S3: Location and Coalescence	The site is within the broad extent of Dunsfold village and would not detract from the linear form of the village. The site would contribute slightly to reducing the gap between Dunsfold village and Dunsfold Park.	Yellow
S4: Natural Environment	The site is within the AGLV and adjoins a SNCI. As woodland there is potential for ecology.	Yellow
S5: Flooding	The site is within Flood Zone 1.	Green
S6: Heritage Assets	No heritage assets are within or adjoining the site.	Green
S7: Community Facilities	Development would not put at risk the Common, existing sport / recreational and cultural facilities and other community assets.	Green
S8: Access and Highways	Access to highway and there is a reasonable possibility that residents would walk or cycle to local facility and services.	Green
S9: Infrastructure	There are sewerage infrastructure capacity constraints.	Red
S10: Deliverability	There are no known deliverability constraints.	Green
S11: Independent Assessment (Stage 1)	Refer to Stage 1: AECOM Assessment.	Yellow

DPSAP 1 – Scale and Density

Site DNP2 measures 1.01ha in total. The current planning application (as referenced above) is for 21 dwellings which is a density of around 21 dwellings per hectare. The NPPF requires the effective use of land and the proposed development is not considered to be out of character for the location.

Furthermore, DNP21 measures a total of 0.58ha. The 12 houses suggested here deliver a density of 21 units per hectare.

It is considered that the RAG Rating for Site DNP2 should be **GREEN** in relation to DPSAP 1 – Scale and Density.

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DPSAP 2 – Land Use

It is assumed that the **RED** RAG Rating is based on the incorrect assertion that “the land is a woodland Plantation”.

Site DNP2 is a field with some planted trees that have been regularly felled. The trees are not considered to be a material constraint to development. The arboricultural statement submitted with the current planning application (as referenced above) states: ***“a number of smaller trees comprising of mainly ash, oak and cherry that are generally of poor form and originate from a historic planting scheme. They have been progressively removed over a period of years.....I have not considered them as a material constraint.”***

In comparison, DNP21 comprises a listed building in the Conservation Area and an open field beyond with a Green Rag Rating. The whole site is not previously developed land as indicated in the Assessment and should therefore be **AMBER** in relation to Land Use. National Planning policy requires that any potential development should not harm the setting of a listed building and adjoining Conservation Area. Whilst the impact is yet to be fully assessed; it is considered that Site DNP2 is less constrained in Land Use terms.

It is considered that the RAG Rating for Site DNP2 should be **GREEN** in relation to **DPSAP 2 – Land Use**

DPSAP 3 – Location & Coalescence

DNP2 sits directly to the north of Gratton Chase. Its eastern boundary is closer to the village than that of Gratton Chase.

DNP21 sits directly to the south of Gratton Chase. Its eastern boundary is more easterly than that of DNP2.

Both sites are considered to be within the village, and both are considered to be sustainably located. We therefore consider that these sites should be judged equally.

It is considered that the RAG Rating for Site DNP2 should be **GREEN** in relation to **DPSA 3 – Location & Coalescence**.

DPSAP 4 – Natural Environment

DNP2 is within the AGLV and adjoins an SNCI.

DNP21 is also within the AGLV and also adjoins a SNCI - see plan below.

Therefore, we believe that these sites should be judged equally.

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We agree with the **AMBER** RAG Rating but the same should be said for DNP21.

DPSAP 5,6,7 & 8

We agree with the **GREEN** RAG Ratings.

DPSAP 9 – Infrastructure

We accept that Dunsfold has an issue with the sewerage infrastructure. However, we are in communication with Thames Water, a dialogue that was first commenced in relation Gratton Chase scheme. We understand that they are currently in the process of delivering a permanent solution for the drainage of Gratton Chase, and we have requested, and had accepted, that our potential scheme is included in the modelling and design of this permanent solution.

We are in no doubt that there is a viable technical solution, the details of which will be known prior to occupation.

We **do not** consider the **RED** RAG rating to be an accurate reflection of the infrastructure capacity and we suggest that an **AMBER** RAG rating would be more appropriate in acknowledging that there is still come uncertainty about the exact infrastructure provision.

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DPSAP 10 - Deliverable & developable

We agree with the **GREEN** RAG Rating in relation to Site **DNP2** which is demonstrated by the current planning application which pending determination.

We would however like to point out that **DNP21**, which that Council has suggested to be one of its five preferred suitable sites, is currently **not available**. The front (including the Old School listed building) is owned by The Guildford Diocesan Board of Finance. The field to the rear is owned by Surrey County Council.

Furthermore, and crucially, the transfer of the field made in 1967 to SCC explicitly states that the land is not to be used for anything other than a school playing field.

Therefore, we do not believe that DNP21 is deliverable in the short or medium term.

Other considerations

Further to our comparison of DNP2 and DNP21 above, we are also of the firm belief that DNP3 and DNP8 are both unsustainable in terms of their location and accessibility to the local services and amenities.

DNP3 is located 1.5 miles from the centre of the village (the Post Office), and there is no footpath, and so all residents of any new development would have to rely on a car to drive into the village to access even the most basic amenities.

DNP8 is located 1 mile from the centre of the village (the Post Office), and again there is no footpath, and so all residents of any new development would have to rely on a car to drive into the village to access even the most basic amenities.

We have attached photographs illustrating this issue at Appendix 1.

Taking all of the above points into account, we strongly believe that of the 35 dwellings proposed in the PC 'list of suitable sites', 23 are not deliverable.

Conclusion

The Site Selection assessment should be updated in relation to Site DNP2 (COOMBEBURY) to reflect the available information and the fact that there is a current planning application should not be overlooked because it clearly demonstrates the site's viability and deliverability within a 5 year period.

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Photographs to show Entrance to DNP3 Wetwood Farm – No public footpath

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Photographs to show Entrance to DNP8 The Orchard – No public footpath

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RESPONSES FROM LAND OWNERS, AGENTS OR DEVELOPERS:

SPRINGFIELD:

From Rob Miller:

Please find below my comments on the Selection of Sites for Housing.

Timescale for comments

I would like to have provided more in-depth comments, but due to personal circumstances and time constraints I have not had the time I would have liked to provide comments. A longer window for consultation would have been appreciated - especially as much of the consultation period has been over the school holiday period.

Coalescence

Much emphasis has been put on avoiding development to the east of Dunsfold to avoid coalescence with the recently approved Dunsfold Park. The Oxford Dictionary definition of coalescence states:

noun

1. the joining or merging of elements to form one mass or whole:

This is a very valid and relevant planning consideration, however it is misleading to state that development on the eastern edge of Dunsfold is causing coalescence with Dunsfold Park. For example the site selection document states that site **DNP20 Springfield** is unsuitable as it is *just 410 metres from Dunsfold Park*. The site maybe 410m from the boundary of the Masterplan area, however there is approximately a further 1km of proposed retained open space beyond the masterplan boundary to the outer edge of the proposed built development. In addition, there is no intervisibiltiy between the two areas due to the intervening distance, topography and mature tree cover. This can in no way be seen to *bethe oining or merging of elements to form one mass or whole-* physically or visually.

Scoring for Site Assessments

The scoring for the site assessments appears arbitrary and inconsistent. In places a similar statement for two sites appears to result in different scores. For example, Site DNP9 - Principle S4: Natural Environment states '*With the exception of the being within an AGLV, the site is not within or adjoining any other environmental designations.*' This scores an orange. However for Site DNP8 - Principle S4: Natural Environment states the exact same phrase, plus states that it is next to Ancient Woodland, and yet it scores a green. DNP21 states exactly the same again, and also scores a green.

DNP20 also records S10: as having no known deliverability constraints, but marks this as a red (this is marked green in the summary page however).

DPSAP 4 provides detailed guidance extracted from the *Guidelines for Landscape and Visual Impact Assessment*. This guidance specifically states that the tables should not be used without professional

judgement - for example, by a chartered landscape architect. These guidelines should not be used arbitrarily to provide weight to judgements made in other ways - there must be proper assessment of sites including the identification of potential receptors; justified sensitivities of receptors; justified assessment of indicative magnitude of change; and a resulting justified assessment of the impact on receptors. There is no evidence of this process which makes this a gross misuse of these guidelines, especially if they are being used to provide informed judgements to residents on the suitability of sites within the village for development.

I find it difficult to understand the extreme differences between the Council's Site Assessment for Springfield (Green), Aecom's Site Assessment for Springfield (Green) and then the Neighbourhood Plan's Assessment for Springfield (Red), especially when it is based on tenuous evidence as briefly highlighted above.

From Chris Miller:

Dear Neighbourhood Plan Team

I am writing to you as Co-Trustee of the Springfield site with reference to your Selection for Sites for Housing.

My cousin has written to you separately with certain planning matters and I agree with all that he has said, particularly concerning the timescale for comments. In addition, I would like to draw your attention to the email below which has not been considered within the documents circulated.

Please note the reduced number of houses, plus the amenity area offered to the community in the form of allotments. Neither of these points were mentioned in the Selection for Sites letter to the community, hence their responses will be being made on incomplete and misleading information.

I understand that you have received various complaints about the short period of time granted to the community to consider the proposals; should a decision be made to grant further time or further rounds of consultation, then we would be grateful if the community would be made aware of what we have actually proposed, not an older version.

I therefore respectfully request that the Neighbourhood Plan Team consider the feedback received from the community in the light of the above and Rob's email below. As previously mentioned, we are very willing to discuss our proposals with you and incorporate any suggestions which you may have.











Attachment: pdf showing site plan



© Getmapping

Springfield

Drawing No. IDF-P001 Indicative Development Framework

-  Site Boundary
-  Completed English Rural development
-  New homes - ca. 20 no.
-  Road / path network
-  Communal building for allotments
-  Allotments - 20 no. 10m x 10m plots
-  Woodland edge / tree planting
-  Wetland meadow / SuDS basin
-  Meadow
-  Amenity grass

Woodland edge planting to include:

- Hawthorn
- Field maple
- Bird cherry
- Privet
- Holly
- Hazel
- Dog rose
- Honeysuckle

Status: For Discussion

scale 1:2,000 @ A3

0 10m 25m 50m 100m

