

Appendix I: Regulation 14 Draft Plan: Written Submissions

Sent to:- xxxxx@btconnect.com

For inclusion in the Regulation 14 Draft Neighbourhood Plan
Consultation comments – from xxxxx xxxxxx 14.09.2022

The Draft Neighbourhood Plan, the inexplicable inclusion of Alehouse Field for housing development, and the damaging effect of that on Dunsfold's application for AONB protection for the whole village.

Alehouse Field:-

- It is a very small, enclosed site in the middle of the village
- It is outside the village settlement – presumption against development
- It is Conservation Area protected land - 'no go' area for development
- It is also protected AGLV land and is to be treated under the Waverley Local Plan Policy as though it were AONB
- It is very closely surrounded by 6 listed buildings, some being amongst the oldest in the village which should be protected
- It has no proper access, but would depend on access over pub land, and then access over a Waverley Conservation Area and footpath
- The cost of building 4 dwellings on this site given the costs of site purchase, purchase and creation of private access, if allowed, Waverley's large charges for access over its Conservation Area footpaths for vehicular access and CIL would put the cost way above the reach of the average purchaser for this size of house
- It is very likely to be impossible to limit the sale to local people or those of a certain age
- There is no evidence whatsoever that for this site "Technical work has been undertaken to ensure that the sites allocated for housing are suitable, achievable (financially viable)" as the Neighbourhood Plan must show
- It has been the subject of several previous planning refusals including refusal by the Planning Inspectorate which apparently have not been taken into account (see below)
- **This would damage the prospect of getting AONB status for the whole village**
- **Development on this site is against the Draft Neighbourhood Plan's own planning policies and Heritage policy**

The inclusion of Alehouse Field for housing in the Draft Neighbourhood Plan is inexplicable given the above. The Neighbourhood Plan Steering Group **refused to correct the obvious omission of the previous planning history of planning refusals** in the background/supporting papers, even when it was pointed out to them. This is very worrying and may well be partly the reason why Alehouse Field has not been given its due and correct **RED** protection in the Plan as its history and heritage protections have **clearly not been properly taken into account.**

The proposal is apparently to create access for Alehouse Field onto the pub land and then over the Conservation Area surrounding the village pub, including the footpath Oak Tree Lane, the Common and War Memorial, all owned by Waverley. This area was selected by Waverley in 2017 to feature on the front cover of its Conservation Area Appraisal document of Dunsfold to highlight that this Conservation Area was being extended to include the common in this important part of the village. Hopefully the Neighbourhood Plan team are aware of this. See front cover below.

This is extremely worrying for the future of the whole village and it's great desire to keep its unique character unchanged, as is mentioned in the first sentence of the Neighbourhood Plan, **particularly in the light of its desire to have AONB status.** The inclusion of Alehouse Field in the Neighbourhood Plan and the impact of any development would obviously **undermine the village's whole AONB case,** since it shows the lack of Parish Council intention or resolve to protect Conservation Areas and heritage assets and their settings.

It would seem that Alehouse Field's inclusion for housing development in the draft Plan is on **someone's wish list,** for whatever reason, and in reality has no sensible basis or justification under the applicable policies. **It is against the National and Local Plan policies and the Draft Neighbourhood Plan's heritage and planning policies themselves. There is no evidence that this has been properly and rationally thought through at any time during the 5 years of the preparation of the Draft Neighbourhood Plan.**

Sadly, you have to come to the conclusion that the inclusion of Alehouse Field, and other sites with issues which have not been properly taken into account, underlines the unsound and flawed nature of the Draft Neighbourhood Plan Allocation of Sites - with its knock-on detrimental effect on the village's desire for AONB status. The village 'consultations' have not alerted the villagers to this considerable worry for the future of the village.

xxxxx14.09.2022.



Adopted 25 April 2017

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2 October 2022

Feedback on the Dunsfold Neighbourhood Plan

The lengthy and time consuming process to prepare the draft Dunsfold Neighbourhood Plan (DNP) is appreciated but I should stress that it has not been widely publicised, hard copy of the Neighbourhood Plan has not been readily available as claimed and the public exhibition was held on only two days, both being during the summer holiday period. Therefore, efforts under Regulation 14 Public Consultation to get the content of the DNP widely circulated will significantly limit the opportunity for a comprehensive considered response from those who will be directly affected by the final decision.

In addition to completing the consultation survey to the best of my ability, and given the limited opportunity to respond meaningfully by its somewhat rigid format, I am writing this letter to supplement the completed form and to focus on what I see as the key issues of the DNP.

- a) Dunsfold Parish Council (DPC) acknowledges that seeking AONB status is important to the village. However, the lack of sensitivity in the DNP by, for example, proposing development of HA1 (Alehouse Field) - which is surrounded by 6 listed building - does nothing to support the importance of a successful designation to ANOB status.
- b) The principle of a strategic gap between the village and Dunsfold Park is welcome but there is an absence of analysis to support its boundary parameter.
- c) Section 5 of the Plan dated July 22, subsection 5.6, states that technical works have been undertaken to ensure that the sites allocated for housing are achievable/financially viable and available. However, DPC's proposed site assessments lack explanation/reasoning and are notably at variance with the independent assessment carried out by AECOM in 2018.

The proposed allocation of housing within Dunsfold is of great importance to everyone in the village but the specific detail of the proposals is neither readily obvious in the documentation provided nor in the Consultation Survey feedback form.

Dealing with each proposal, I make the following comments:

1. HA1 Alehouse Field: This site has no direct access, is within the Conservation area and there are six listed properties surrounding it. The

original development proposal for 11 town houses was opposed by many village residents and the developer abandoned this project. The Steering Group (SG) have suggested 4 dwellings on this site but, bearing in mind the cost of both the land and securing access, it is highly questionable that such a limited development would be financially viable for any developer. **It should not be included in the DNP.**

2. HA2 Coombebury: This site is outside the northern settlement boundary. In 2018, the AECOM assessment of this site was amber and in November 2020 it was rejected in WBC's Land Availability assessment. By including this site in the DNP, the Parish Council has failed to take into account both the resounding refusal by Waverley Borough Council of the planning application for this site and the objections of more than 90 members of the public and other organisations. Furthermore, the inexplicable inclusion in the NP proposals for 12 houses on this site simply weakens WBC's argument for refusing planning permission at the forthcoming appeal. Additionally, when the Grattons Chase development was approved, it was on the understanding there would be no further development as this area already has a high density of housing. To propose 12 houses within the DNP is a betrayal of the assurance previously given. **This site should not be included in the DNP.**
3. HA3 Wetwood Farm: This area is a disused chicken farm which urgently needs to be redeveloped. A development of a total of 12 dwellings would have little impact on the village centre or the AONB application and the final density would be below the 15dph ceiling. **It was approved by the SG and should be included in the DNP proposals.**
4. HA4 The Orchard: The site owner of this semi industrial site is only interested in one dwelling for himself so the DNP proposal for 2 dwellings should be challenged.
5. HA5 Springfield: In 2018, of the 20 sites assessed in the AECOM Report, this site (referred to as DNP20) was considered suitable for construction of 32 dwellings. Eight affordable units have already been built and the owner's proposal to add a further 21 houses with provision for other community amenities such as allotments should be embraced, particularly as the PC acknowledge the non-clay content of the soil. This site has WBC approval, would provide valuable amenities for the benefit of the village and would be a significant contribution to the overall housing requirement. For the DNP to attribute only 10 houses to this site becomes less financially viable for any developer and an under utilisation of an appropriate development site.

DPC should readdress the site allocations as detailed in the DNP and amend their proposals to take account of the application for AONB designation, the preservation of the Conservation Area, the retaining of the existing northern Settlement Boundary, the existing high density level at the north of the village and the questionable financial viability of the Springfield proposals as stated in the DNP.

A viable proposal – such as 21 houses for Springfield, 7 for Wetwood and 1 at The Orchard would almost meet the full housing requirement of 32 houses by 2032 and allay the concerns raised by many village residents over recent years.

I must stress that the lack of availability of hard copy of the Neighbourhood Plan will inevitably restrict the involvement of those villagers who are not particularly computer literate and the consultation response form assumes full knowledge and understanding of all policy issues. This is not realistic and responses received will therefore be highly selective and not representative of the village population as a whole.

Yours truly

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Dunsfold Neighbourhood Plan.

I have followed the development of this Draft Plan for some years, and although most of the processes followed appear to be acceptable, the outcome I believe is totally unsatisfactory.

Section 5 of the Plan dated July 2022, subsection 5.6 states that technical works have been undertaken to ensure that the sites allocated for housing are achievable (that they are financially viable) and available (that the owners are willing to bring the site forward for the dwellings stated). In my view the Steering Group has failed to maintain the required standard on all the sites selected, and in particular with regard to the housing numbers.

In practical terms the list of selected sites and the allocated dwelling numbers represents a “wish list” that does not meet the objectives detailed in 5.6. I will need to detail the problems in site order:-

HA1 Alehouse Field.

This site is situated in the Conservation Area, with 6 listed properties surrounding it. There is no direct access to this field, and the Developer who originally showed some interest, was having to buy access through the curtilage of the Sun Inn. The original proposals for this development were for 11 town houses. This was opposed by many of the village residents, and it appears that the Developer has abandoned this project. The Steering Group have suggested 4 dwellings which is totally at odds with the original proposal, and is unrealistic in the face of the costs to buy the site and access. **This site should not have been listed.**

HA2 Coomberry Farm.

This site is already subject to a Planning Application from the Developer Kitewood. That application was rejected by the Parish Council, Waverly Borough Council, and many objections were made from Dunsfold residents.

The Developer was proposing to construct 21 dwellings in a format that was totally alien to the rural nature of the site, with the houses grouped in the middle with the central area occupied by fencing.

Many of the objections suggested that a reduction in site density, and a more sensitive approach to the layout of some 12 dwellings would make a more acceptable development. This number 12 has been selected by the Steering Group in the hope that Kitewood would accept this proposal.

Unfortunately Kitewood have ignored the Residents suggestions and have appealed the original Planning Application to develop 21 dwellings on this site.

Clearly again the “Wish List” of the Steering Group has failed the objectives laid down in Section 5.6, and **the site should not have been included in the Selection list.**

HA3 Wetwood Farm.

This is a disused chicken farm which urgently needs to be redeveloped. The owners already have approval for 5 dwellings and have recently applied to extend the development to 12 dwellings. This increased balance of 7 has been included in the Steering Group shortlist.

Unfortunately the Parish Council elected to disapprove this application, without making it clear what the objection was.

Again how can the Steering Group include a site that its own Council is opposed to.

The only question I have is related to the distance this site is from the village and that there is no foul water system in operation by Thames Water for this area.

HA4 The Orchard.

This is a semi industrial estate with manufacturing, storage, and office facilities. The Steering Group seem to think it can accommodate 2 dwellings, when the owner of the site is clearly only interested in 1 dwelling for himself.

Again the Steering Group has put forward a non commercial proposition.

HA5 Springfield.

Interestingly this is the only site proposed that has WBC approval. There are already 8 affordable units on the site, and the owners of the site would like to extend the build options and in addition provide a number of Community amenities.

Regardless of this background, the steering Group was persuaded to restrict the potential increase to 10 dwellings.

This is totally out of line with the commercial interests of the owners, and they have correctly countered with a Planning Application for 21 further units. This application should be endorsed by the Parish Council in a positive way.

In summary, my view is that the site and dwellings list should be amended to :-

HA3 Wetwood Farm -7 dwellings.

HA4 The Orchard – 1 dwelling.

HA5 Springfield – 21 dwellings.

Making a total of 29 towards the expectation of 32. The balance could well come from windfall sites or further Planning Applications following the acceptance of this Neighbourhood Plan. However there is one overriding issue that all developments in this village have to accommodate, and that is the failure of Thames Water to provide a satisfactory long term solution to the pumping of foul water. Until that is solved WBC and the Parish Council should abstain from Planning Application approvals.

I hope this report has clarified my position on the sites proposed and how they should be modified if the Neighbourhood Plan has any chance of being accepted by the Dunsfold Community.

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DRAFT NEIGHBOURHOOD PLAN RESPONSE.

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We appreciate the work that DPC and Steering Group have put in to devising the draft Neighbourhood Plan. Within the obvious limitations with which you are working, we recognise your efforts to attempt to protect the unique nature of our village.

However, we remain totally baffled about the selection of preferred development sites. Having attended many DPC meetings over the past two years, scrutinised the DPC and SG minutes and written to your officers and councillors requesting formal responses to strategic changes to your plans, the logic of your proposed route forward seems no clearer. At council meetings, and outside, people are reminded that the target figure of 100 houses is only a minimum. The phrase “look at Alfold and what has happened there” is often quoted inside and outside DPC meetings as a warning of what might occur here. Yet the decision to recommend the Coombebury site effectively opens the door to further development on the the north east side of Dunsfold Common Road. That’s not just our opinion. It has been the established view of DPC for, at least, the past 15 years. (WA/2020/1728)

One of the issues we have raised without gaining any response from DPC is how and why all those years of council planning policy, to ensure the development border remained at Gratton Chase, suddenly evaporated? We can’t find any debate about it in the minutes of DPC meetings. There has been no attempt to explain the dramatic reversal of policy to the people of Dunsfold. Indeed, when the people were consulted by AECOM and asked for their views on future development sites, the development of the Coombebury site, and others in this area, was unwanted. Yet AECOM left the scene, Nexus were brought onboard as advisers, and the feedback from those public meetings evaporated.

The planning application by Kitewood to build 21 houses on the site known as Coombebury prompted 90 objections and was called in by Waverley councillor John Gray. In their letter of objection in April 2021, DPC’s opening position was one of refusal on the grounds that “the site is situated outside the current village settlement and the development will have a negative impact on the built form of the settlement. Further, as explained in the current Local Plan, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. Residents have already expressed their concern that, if allowed, this proposal will encourage further development to the north and east of this site. Such concerns have been enhanced by land agents contacting residents using this application to encourage the sale of such lands for development. It is imperative that such concerns are shown to be baseless.”

Those are sentiments many villagers totally agreed with. Yet later in the DPC letter of objection the tone becomes conciliatory including phrases such as: “If the planning authority considers that this site is suitable the parish council would wish that the scheme is redesigned so as to reduce its density, perhaps to no more than 12 dwellings.”

Thankfully when the Waverley BC Planning Committee (Eastern Division) discussed the Kitewood application one of the key issues was the impact on Dunsfold if the development boundary was moved. It was highlighted how the change in boundary would open the door, not just to Kitewood, but other aggressive developers ready to exploit this change and chase planning permission for other fields along Dunsfold Common Road. As DPC are aware this is the domino effect they had always previously opposed and is a situation that is developing now.

Two Waverley Councillors spoke persuasively against the Kitewood application. Dunsfold's John Gray and Kevin Deanus from Alfold. Steven Haywood, the Chairman of DPC, also spoke, ostensibly in objection. But his position was undermined by his inability to utter the words "object" or "objection" and his summing-up was: "If properly considered our village could benefit from a new, vibrant addition to the community." Many villagers were shocked and dismayed by his words but, in a sense, they didn't matter. The Kitewood application was resoundingly defeated 10-3.

Then, just seven days later, in the immediate aftermath of an apparent victory for the village of Dunsfold and our established planning principles, DPC included the Coombebury site in the draft NP, this time for 12 houses. Nobody from DPC has explained in public sessions of council meetings, and there is no minute of discussions, to explain their decision to insert into the NP a site they had officially objected to and which had been rejected by Waverley BC. It is our belief, given the planning history and decision of the Waverley hearing, that the Coombebury site should be removed from the draft NP. Its presence in the plan is being actively cited by Kitewood in their appeal for permission to build 21 houses there.

The north of Dunsfold already has the densest levels of housing and population. We were signatories to a petition signed by 97 residents in March 2018 in the wake of the decision to develop Gratton Chase. The wording of the petition was: "We, the undersigned, object to the disproportionate amount of housing which is proposed for the north end of the village due to more suitable central sites being available, particularly site number 788 (Springfield). It is felt that the established Griggs Meadow and Windways settlements, together with the proposed site 747 (Gratton Chase) are enough without expansion into what will become an outlying suburban estate and ruining the nature of our village."

At the time that permission was granted for Gratton Chase, DPC described it as "a once in a generation extension to the village." In fact, in response to Waverley BC to a planning application for the site known as Chennels field (WA/2021/03081), DPC's letter of objection stated: "As part of our preparation for the Neighbourhood Plan the Parish Council received a petition from residents living in the north of the village opposing any further residential development in this part of the village. The number of objections already made in respect of this application verifies the strong opposition by current residents. Approving this application, despite the planning policies in the Local Plan and the strength of residents' opposition, would constitute a failure of democratic engagement."

DPC warned Waverley of a "failure of democratic engagement". Yet that is exactly where DPC are taking the village now with regards to the draft NP. And we are not alone in believing the draft NP has become an issue of trust with our parish council. You will be aware that on the back of the Kitewood application and impending appeal, the owners of the main Coombebury site have reached an agreement to sell their property for development and the McAllister family, owners of the Chennels field, have an appeal in November in their attempt to gain permission to erect five self-build houses there. The dangers of the domino effect are plainly evident. As Councillor Kevin Deanus said at the Waverley planning committee hearing on October 13, 2021 when the Kitewood plan was rejected: "There is a reason we have development borders and if you start moving this one they'll be building all the way to Hascombe." Perhaps a case of hyperbole within a debate but it focused minds on what was at stake and, given Mr Deanus is from Alfold, he knows all about the planning dangers we are facing.

Running between Coombebury Cottage and the Chennels field is the ancient footpath which climbs to High Loxley Farm. In the current review to decide whether Dunsfold merits AONB status this has been one of the areas most cited and photographed by the public as to why the enhanced status should be achieved, perhaps by the summer of 2023. Waverley's Local Plan (Policy RE3) requests that areas likely to be included in the AONB should be respected. On an AONB webinar that we attended with at least one senior officer of DPC, it was clearly stated that building developments would categorically undermine the case for AONB status.

In our opinion, the heritage value of properties surrounding the Alehouse Field site and situation within the conservation area, means it can not be realistically seen as a development site within the draft NP. Just as the petition stated back in 2018, it is our belief that the bulk of the required houses should be built on the Springfield site. Given the reported willingness of the land owner to deliver both numbers and specific types of property, Springfield would positively resolve many, if not all, of the issues we are currently wrestling with. We believe that would be a fairer approach to the next NP and urge DPC to take it onboard.

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2 October 2022

Dear Sir or Madam

I set out below my response to the Regulation 14 consultation on the draft Dunsfold Neighbourhood Plan dated July 2022 (the “**Draft DNP**”).

THE SPRINGFIELD SITE SHOULD NOT BE ALLOCATED FOR THE BUILDING OF ANY NEW DWELLINGS

1. For the reasons given below, the Springfield site, identified as HA5 in the Draft DNP, should not be allocated for the building of any new dwellings at all.
2. **The conclusions of the Steering Group**
 - 2.1 As a preliminary point, it is worth recapping the conclusions of the Steering Group, which ascribed to the Springfield site the highest number of negative outcomes in Site Assessment process. Specifically, the Steering Group assigned an RAG rating of “Red” (indicating unsuitability) against each of the following six criteria:
 - (a) Scale and density: “large scale major development”;
 - (b) Land use: “greenfield and would result in the loss of good agricultural land, which, unlike most of Dunsfold, is not heavy clay”;
 - (c) Location and coalescence: “outside the settlement area and would materially contribute to narrowing the gap between Dunsfold village and Dunsfold Park. It would detract from the linear development of the village”;
 - (d) Natural environment: “within an AGLV...Development would detract from the openness between the village and land to the east”;
 - (e) Access and highways: “no footpath and It would be difficult for residents to safely walk to local facilities and services”; and
 - (f) Infrastructure: “potential sewerage infrastructure capacity constraints”.
 - 2.2 Against this backdrop, it is difficult to understand how or why the site could be considered suitable for any number of new dwellings.
 - 2.3 It appears to have been included in the Draft DNP on the strength of a survey conducted in April 2021, by which 24 individuals expressed support for the site (with 9 objecting).
 - 2.4 With respect, the Steering Group should exercise considerable caution in placing reliance on sample such as this. Those who expressed support for the site represent just 2% of the

village, and the fact is that when the proposal was put before a larger pool of respondents in March 2019, 65% of them objected to further building on Springfield.

- 2.5 It is important to ensure that an objective, evidence-based assessment – such as the one carried out by the Steering Group in its Site Assessment – is not overridden by a very small but very vocal minority.

3. **Inappropriate development on Greenfield land**

- 3.1 Springfield is a Greenfield site in an Area of Great Landscape Value, which is soon expected to be listed within the Surrey Hills Area of Outstanding Natural Beauty. As members of the Community have pointed out in the past, it is situated between two of the village's finest listed houses, and sits opposite the cricket green in one of the most visually sensitive parts of the village.

- 3.2 The starting point is that the beauty of this countryside land should be recognised and safeguarded from any development, and in particular development of a kind that would result in suburbanisation.

- 3.3 When the site was assessed by Waverley Borough Council in 2017, a Council Officer concluded that:

“the provision of housing in this location would involve suburbanising engineering, construction and boundary treatment that would not be in keeping with the landscape context.”

- 3.4 That view was expressed in the context of a relatively small scale development of eight new homes. It would be all the more true of a development totalling some 20 homes.

4. **Precedent and incremental development**

- 4.1 In 2017, permission was granted for the construction of eight new homes on a relatively small slice (under 0.5 hectares) of the Springfield site, as a “Rural Exception”. As to this:

(a) Permission was only granted because of the very special circumstances that pertained to that small scale development of 100% affordable homes for local residents. It was this unique characteristic that led to the Council to conclude that the harm to the character of the countryside (summarised at paragraph 3.3 above) was outweighed by the advantages of affordable local housing provision on a small proportion of the plot.

(b) The Dunsfold Parish Council made it absolutely clear that any further development of the Springfield site was “strongly objected to” by the residents of the village.

- 4.2 It is important for the Community to send a clear message to developers that a “Rural Exception” means just that – a limited exception to the principle that Greenfield sites will not be built upon. It is not a “foot in the door” to develop our countryside.

- 4.3 If the landowner were permitted now to develop the Springfield site with a further 10+ market homes, he would be achieving by two steps that which he could not possibly have achieved by one. The Community should be very concerned about allowing planning principles to be circumvented in this way, and the precedent that this would set for future developments.

4.4 The Community need look no further than the Springfield site itself to see how a permissive approach to Greenfield development is a slippery slope, by which an “exception” can incrementally but quickly progress to a large suburban development. Summarising the history:

- (a) In 2017, the Springfield site was approved as a “Rural Exception” for 8 homes.
- (b) In 2021, the fact that 8 homes had been built was put forward as a justification for bringing the total to 18 homes, with the building of another 10.
- (c) In 2022, the fact that 8 homes have been built and 10 proposed in the Draft DNP was put forward by the landowner (in a recent planning application) as a justification for bringing the total to 29 homes, with the building of another 21.

4.5 If this site is supported by the Community, it will create a dangerous precedent for the village that will undoubtedly encourage and promote the circumvention of planning principles and the insidious creeping of Greenfield development.

5. **Proximity to the village**

5.1 The Steering Group rightly identified that the Springfield site is an isolated development that does not sit within the settlement boundary.

5.2 In terms of access, it was the conclusion of the Surrey County Highway Authority, when consulted in 2017, that the site was not suitable, even for the 8 dwellings that were then under consideration as a Rural Exception:

“The County Highway Authority (CHA) considers that the application site is not an ideal location in sustainable transport terms for new residential use, as it is not easily accessible by modes of transport other than the private car. It is not located within a reasonable walking distance from key services and facilities such as jobs, shops, schools, health and leisure facilities. Residents of the proposed residential use would therefore be heavily dependent on the private car for access to normal day to day services and facilities, hence the development would be contrary to the sustainable transport objectives of the NPPF.” (12 October 2017)

5.3 The position remains the same today, and the difficulties would be all the more acute if the number of dwellings were to more than double. The landowner has provided no evidence that it would be viable to construct footpath access to the site.

5.4 Even if access to the village by foot were possible, it is inevitable that the residents of any new development would come with multiple vehicles. Within Dunsfold, the significant majority of homes have more than 2 vehicles, and Policy TG03 requires an allocation of 2 spaces for each 1-2 bedroom dwelling, and at least 3 spaces for each 3+ bedroom dwelling. Even with 10 additional dwellings, the result would likely be somewhere between 35 and 40 vehicles on the Springfield site. This level of concentration outside of a settlement boundary and on Greenfield land is plainly undesirable.

6. **Coalescence with Dunsfold Park**

6.1 The Steering Group rightly identified that development of the village to the east would have the undesirable effect of reducing the gap, and therefore increasing the risk of coalescence with, the proposed new housing development on the Dunsfold Park site.

- 6.2 This is a factor that that must militate very strongly against an enlargement of development on the Springfield site. There are three elements to this:
- (a) There can be no dispute that the development of Springfield – which accounts for a substantial proportion of the Greenfield land between Dunsfold and the western fringe of Dunsfold Park – would have the effect of reducing by around one-third the physical separation between Dunsfold Village and Dunsfold Park.
 - (b) While little is certain as to how the Dunsfold Park site will be organised, it is clear that the development will be enormous in scale, with up to 2,600 new homes (or, according to some sources, up to 5,000 new homes). It would be reasonable to anticipate that the developers will wish to exploit every available square meter of the site, and it should therefore be assumed that the perimeter of Dunsfold Park will run very close indeed to Dunsfold Village.
 - (c) If the Community were to permit this incremental development of Springfield, it is not difficult to foresee that when the need for further housing arises (i.e. come 2032) the field to the east will be put forward for development as a “modest extension” of the Springfield site, further closing the gap between the two.
- 6.3 Dunsfold is a small village of some 450 homes, which has developed its own identity and character over the course of some 800 years. It is critically important that it should remain distinct from, and not be subsumed into, a newbuild development of some 6 times its size. If Dunsfold is to avoid being dwarfed and stripped of its identity over the course of the next decade, this is a factor to which the Community should give the utmost weight.

7. **Ancillary harm to the village**

- 7.1 There are three further factors militating against the development of the Springfield site:
- (a) The use of the site for residential dwellings would deprive the village of high quality agricultural land which, unlike most of the land in Dunsfold, is not heavy clay. Paragraph 112 of NPPF provides that if development of agricultural land is necessary, areas of poor quality land should be used in preference, while Policy RD9 of the Waverley Borough Local Plan 2002 prohibits a development that would result in the loss or alienation of best and most versatile agricultural land, absent a strong case to do otherwise.
 - (b) The development of 20 properties in close proximity would inevitably increase light pollution around the proximity of the village. Dark skies are considered by the Community to be one of the most important characteristics of the village.
 - (c) If (contrary to all current expectations) it were possible to develop footpath access to the site, that would almost certainly require the installation of street lighting along the route. This is something which is opposed by 84% of the village.
- 7.2 While these three factors are not determinative in and of themselves, their cumulative impact, taken together with the more significant issues identified above, points strongly against any further construction on Springfield.

ALTERNATIVELY, BUILDING ON THE SPRINGFIELD SITE SHOULD BE LIMITED TO 7 DWELLINGS

8. If, contrary to observations set out above, the Community considers that Springfield is an appropriate site for the construction of some new dwellings:
 - (a) such dwellings should be limited in number to 7, rather than 10, as outlined in the Draft DNP; and
 - (b) it should be made clear that the construction of any dwellings in excess of that settled upon in the final version of the Dunsfold Neighbourhood Plan is not, and never will be, acceptable to the Community.
9. The reasons why the Community should take this stance are set out below.
10. **The absence of demand for more than seven dwellings**
 - 10.1 The starting point is that development within Dunsfold, and in particular on a Greenfield site, must be limited to that which is strictly necessary, and no more.
 - 10.2 The actual housing requirement over the relevant period (i.e. to 2032) has been determined by AECOM to be 90 new dwellings. This is more than satisfied by the existing permissions taken together with sites HA1 to HA4. From a demand perspective, therefore, the 10 dwellings proposed for HA5 (Springfield) are surplus to requirements.
 - 10.3 It is recognised that in order to meet the quota imposed on Dunsfold, provision must be made for 100 new dwellings. However, the Draft DNP provides, unnecessarily, for 103 dwellings – i.e. 3 more than required by the quota, and 13 more than actually required according to the AECOM assessment.
 - 10.4 If, therefore, the Community deems it necessary to allocate Springfield, it would be appropriate, having regard to all of the points mentioned above, to limit the development to the extent possible by confining the number of new dwellings to 7.
 - 10.5 While it would remain highly undesirable to permit any further development on a Greenfield site, the building of a further 7 properties immediately behind the existing Miller Lane site would limit the violence that is done to the openness of countryside, while still allowing Dunsfold to deliver the precise number of dwellings required of it.
11. **The floodgates risk and the prospect of large scale development**
 - 11.1 The unfortunate reality is that if 10 dwellings are approved in principle by the Community, that will encourage the landowner and developer to press for more, until the site becomes a suburban housing estate.
 - 11.2 Some members of the Community may be aware of the planning application that has recently been submitted by the landowner, seeking permission for 21 new dwellings, with the development of every inch of the site.
 - 11.3 The plans for the site are set out in a diagram accompanying the application, which is replicated below:



- 11.4 In an effort to justify the application for 21 new dwellings, the landowner relies on the fact that the Draft DNP makes provision for 10 new dwellings. This exhibits quite vividly how the giving of any ground on Greenfield development inspires in landowners and developers the attitude of “just a few more”. If the Community does not take a firm stand to reign in development where it can, it leaves itself open to this insidious and incremental expansion.
- 11.5 While the landowner seeks to downplay the extent of the proposed development, characterising it as a “modest extension” and a “natural continuation” of the affordable home development, it is in fact nothing of the sort.
- 11.6 The reality is that the landowner seeks to create a large and modern housing estate with a development footprint of some **10 times that of the existing development** (which was approved as an exception to provide affordable homes, over strong opposition from the community):



As demonstrated by the above, the eight Miller Lane properties would fit into the remaining Springfield site (which the landowner seeks to develop in its entirety) almost 10 times over.

- 11.7 What is now in contemplation by the landowner is a large scale suburban development, primarily of open market homes, including 10 sizeable detached dwellings with substantial garden plots. These properties are plainly not targeted at local families; it is self-evident that they would, in the main, only be within the financial reach of those in receipt of City salaries. The Community is unlikely to want or need to create a large dormitory estate for London commuters.
- 11.8 A development of almost 30 homes, as is now sought by the landowner, would result in some 7% of the village's entire housing stock being situated on a single Greenfield site outside of the settlement boundary. This would represent a material shift in the gravity of the population away from the centre of the village, as well an material movement of the population east and towards the Dunsfold Park site.
- 11.9 In addition, the Community could anticipate:
- (a) An incongruous site in one of the most visually sensitive parts of the village: on a plot of land outside of the settlement boundary, where the density of housing is 2 dwellings per hectare, a suburban development of this size and nature would be entirely out of keeping with its surroundings, and at odds with the character and feel of the village.
 - (b) A substantial increase in traffic in and around the village: a development of this size would, based on Policy TG03, result in somewhere between 70 and 90 vehicles situated on the Springfield site.
 - (c) An increase in light pollution: it is undoubtedly the case that a concentration of some 30 homes would be detrimental to Dunsfold's dark skies.
- 11.10 For all of these reasons, the Community must take stand against the cynical and opportunistic attempt to over-develop the Springfield site, for which there is simply no need.

CONDITIONS THAT SHOULD ATTACH TO ANY ALLOCATION OF THE SPRINGFIELD SITE

12. In the event that the Community were minded to support any further building on the Springfield site, that support should be conditional on two things.
13. **Landscaped edge to the north-west boundary**
- 13.1 First, the development should include a landscaped edge with appropriate woodland screening along the south-eastern boundary to soften the transition between the urban form and agricultural landscape. This is rightly provided for in the Draft DNP as it currently stands.
14. **Landscaped edge to the north-west boundary and gap between the boundary**
- 14.1 Second, the development should include a landscaped edge with appropriate woodland screening along the north-west boundary, with a gap of at least 20 meters between the outer perimeter of the development and the boundary with the adjoining neighbours, Springfield House and Bridge House.

- 14.2 Unlike many of the proposed plots, development on the Springfield site has the potential to have a direct and profoundly prejudicial impact on the families living in the immediately adjoining properties, including a serious loss of privacy and a loss of light.
- 14.3 When the construction of the existing 8-house development on Miller Lane was under consideration in 2017, Waverley Borough Council rightly considered the impact of that development on the residential amenity of the surrounding properties and concluded, again rightly, that the development would have no impact “because of separation distance between proposed dwellings and neighbouring property”. The same would not, of course, be true of development on the larger part of the Springfield site.
- 14.4 It is only right that members of this Community should consider and accord some weight to the rights and interests of their current neighbours when setting its policy on matters such as these. The attachment of this minor condition would not materially interfere with any reasonable development of the site, and would significantly mitigate the damaging effects of the development on the existing residents of the village who would be most acutely affected by it.

Yours faithfully

xxxx

xxxx

From: [Cxxx](#)
To: [xxxx](#)
Subject: Fwd: Ale house field
Date: 15 September 2022 09:10:43
Attachments: [PastedGraphic-3.png](#)

And the 2nd.

Regards

xxxxx

Clerk & RFO to Dunsfold Parish Council

Unit 3, The Orchard

Chiddingfold Road

Dunsfold, GU8 4LH

01483 200980



Begin forwarded message:

From: xxxxx <[xxxxxxx](#)>

Subject: Ale house field

Date: 14 September 2022 at 16:22:03 BST

To: xxxxx@btconnect.com

Cc: xxxxx <sxxxx.com>

The comments set out in xxxxx's letter to the parish council of 14/9/22 I fully agree with and have nothing further to add

xxxxxxx

Sent from my iPad

From: [xxx](#)
To: [xxxx](#)
Subject: Fwd: Ale House Field
Date: 27 September 2022 17:12:18

Hi xxx- I have this and another email which I'll send on, then scan and forward a hand written note.

Regards

xxxx
Clerk & RFO to Dunsfold Parish Council
Unit 3, The Orchard
Chiddingfold Road
Dunsfold, GU8 4LH
01483 200980

Begin forwarded message:

From: xxxx <lxxxx> **Date:** 26 September 2022 at 20:18:08 BST
To: dxxxxx@btconnect.com **Subject:** **Fwd: Ale House Field**

Begin forwarded message:

From: xxxx
<lxxxxx@gmail.com>
Date: 24 September 2022 at 12:26:35 BST
To: xxxxx@hotmail.com **Subject:** Ale House Field

I am writing to strongly object to building on Ale House Field. When I bought Pond Cottage a year ago I was told it was 'outside the village settlement.

As the field is surrounded by many lovely, old, listed houses it should be protected as such, as we will end up with too many 'in fills' and precious little green spaces. More light and motor fumes pollution.

There are bats, dragon flies, slow worms and the occasional pheasants and more wild life in the field.

With a huge development going up on the Dunsfold aerodrome, this in itself creates a mini village and becomes a 'clique'. I have seen this happen several times first hand.

Young people struggle to pay their mortgages and keep a roof over their heads and as a result do not have the time or energy to 'give back' or join in village life except on special occasions. Dunsfold, at present, is a lovely caring and diverse village. We do not want to lose that. Increased numbers dilute everything alas.

The Common is in the Conservation area and should be respected as more houses mean MORE pollution as I have already said. As we are hoping to get an ANOB status for the village, consider the damage as afore mentioned.

XXXXX

From: [xxx](#)
To: [xxxxx](#)
Subject: Fwd: Further development in Dunsfold
Date: 05 September 2022 08:16:15
Attachments: [PastedGraphic-3.png](#)

And the 4th response.

Regards

xxxx

Clerk & RFO to Dunsfold Parish Council
Unit 3, The Orchard
Chiddingfold Road
Dunsfold, GU8 4LH
01483 200980



Begin forwarded message:

From: [xxxx](#)>
Subject: Further development in Dunsfold
Date: 4 September 2022 at 17:02:40 BST
To: "xxxx@btconnect.com"
<xxxx@btconnect.com>

Dear Dunsfold Parish Council

Further to notification of further housing development in the village we would like to lodge our joint objection to the proposed housing at Coombebury and Alehouse field.

When the suggestion of the first additional housing (Nugents Close) was initially made in the village, there was meaningful consultation with residents and it was designated for young local people. There was a questionnaire to see who wanted to continue to reside in the village and be given the opportunity to apply for a new residence. There was no protest and it worked successfully.

However time has moved on and there has been already two additional housing developments in the village, one to the north of Nugents Close and another by the cricket pitch. We certainly feel these developments are sufficient to house people who would like to live here. Dunsfold is a beautiful village and we have both been fortunate to live here for over fifty years and do not see the need for more pockets of development squeezed in at Coombebury and Alehouse field just for the sake of developers pockets, not caring who the housing is for. There has been no proper consultation with residents and no studies made to make sure additional housing is required.

With proposed development encircling the village ie Dunsfold Park one has to ask why is more housing needed specifically in the village.

Yours faithfully

xxxx xxxx/ xxxxx xxxx ent

from my iPad

To Dunsfold Parish Council

Re: The Neighbourhood Plan

I have completed the survey but wanted to include some additional thoughts.

As you may know, I was part of the NP steering group at the beginning. I was one of those who fell by the wayside as Lynne Hamil was so good, and I felt I had little to offer. She is amazing in her attention to detail and sheer brainy-ness!

But where I feel this NP falls short is that it doesn't address the views of the village, especially those of us in the north.

Because of the DPC's failure to act on the proposals for the Coombebury site and throw out that application – ie take it right off our NP, we are now in the worse position with the Wheelers of Coombebury Farm losing patience and wanting to – and in the process of – sell out to developers. I understand that there are planning permissions that need to be granted for this site, but nonetheless, it is a threat. And a much bigger one than Coombebury Field.

Also, I don't think it is humanly possible for Rupert not to be influenced by his friend's desire to develop the field at Coombebury, however neutral he claims to be. He's human and he has a bias.

This site has already had a Planning Application from the Kitewood, which was rejected by the DPC and Waverly and there were many valid objections from those of us in the north of the village. That application was rejected by the Parish Council, Waverly Borough Council, and many objections were made from Dunsfold residents. We went through the debacle with the 12 and are now back to 21.

This is such an unpopular site, and the DPC and NP steering groups insistence on keeping it in the plan is such a rejection of the views of the village. **How can we believe you care at all what we think or want?**

Wetwood Farm would surely be a better site, but the DPC rejected it. Why? Please reinstate it on the NP for 12 houses.

And surely Springfield is perfect site to have 21 further houses (it is what the owners want) and does not impinge on anyone or anything as far as I know.

Those two sites alone would really go well toward our target and not upset those of us in the north of the village who DO NOT WANT ALL DEVELOPMENT BASED UP HERE. Also, the residents of Grattons Chase were assured there would be no more development, yet the Coombebury Farm Field is right in their faces - opposite a number of dwellings.

These plus the individual houses surely will ^{be} a really good number towards our total

PLEASE REMOVE COOMBEBURY FROM THE PLAN AND PUT IN Wetwood Farm and Springfield for the numbers mentioned?

PLEASE BE THE PARISH COUNCIL THAT SERVES ALL THE VILLAGE, NOT JUST THE FEW.

Yours
faithfully

xxxx xxxxx



Dunsfold

Neighbourhood Plan

Dunsfold Neighbourhood Plan Consultation Survey

Our Neighbourhood Plan Public Consultation (under Regulation 14) started on Friday 5th August 2022 and runs until Monday 3rd October 2022.

The draft Regulation 14 Dunsfold Neighbourhood Plan and its supporting evidence base can be viewed on the Parish Council Neighbourhood Plan website:

www.dunsfoldparishcouncil.gov.uk/neighbourhood-plan

Hard copies of the Neighbourhood Plan are available at key locations around Dunsfold Parish, including the Parish Council office, plus Waverley Borough Council's office in Godalming.

Vision and Key Planning Principles						
1.	Do you agree with the above Vision for the Neighbourhood Plan area?					
	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know					
2.	On a scale of 1 to 5 (with 1 being "strongly disagree" and 5 being "strongly agree"), how far do you agree with the following policies)?					
	a) Policy P01: Core Planning Principles	1	2	3	4	5
	b) Policy P02: Spatial Development of Dunsfold	1	2	3	4	5
	c) Policy P03: To prevent coalescence of Dunsfold settlement with Dunsfold Park	1	2	3	4	5
	Do you have any comments on the Vision and above policies (please reference the policy on which you are commenting)?					

Housing

3. On a scale of 1 to 5 (with 1 being "strongly disagree" and 5 being "strongly agree"), how far do you agree with the following Housing policies?

a) Policy HO1: Provision of Housing	<input checked="" type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5
b) Policy HO2: Self-Build Houses	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5
c) Policy HO3: Windfall Sites	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5
d) Policy HO4: Mix of Housing Size	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5

Do you have any comments on the above policies (please reference the policy on which you are commenting)?

Coomebury - 12? See attached letter
 Springfield - 10 - Surely there is more space and will for more than 10 houses here

4. On a scale of 1 to 5 (with 1 being "strongly disagree" and 5 being "strongly agree"), how far do you agree with the following Housing Allocations?

a) Housing Allocation HA1: Alehouse	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5
b) Housing Allocation HA2: Coombebury	<input checked="" type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5
c) Housing Allocation HA3: Wetwood Farm	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5
d) Housing Allocation HA4: The Orchard	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5
e) Housing Allocation HA5: Springfield	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5

Do you have any comments on the above policies (please reference the policy on which you are commenting)?

Tho' what about the businesses there.

Natural Environment

5. On a scale of 1 to 5 (with 1 being "strongly disagree" and 5 being "strongly agree"), how far do you agree with the following Natural Environment policies?

a) Policy NE01: Habitats and Biodiversity	1	2	3	4	5
b) Policy NE02: Trees, Woodland, Hedgerows and Landscaping	1	2	3	4	5
c) Policy NE03: Flood Risk, Sustainable Drainage Systems and Water Management	1	2	3	4	5
d) Policy NE04: Light Pollution and Dark Skies	1	2	3	4	5
e) Policy NE05: Noise Pollution	1	2	3	4	5

Do you have any comments on the above policies (please reference the policy on which you are commenting)?

"In NE02 you say "Where harm to existing woodland ... cannot be avoided it should be ... adequately mitigated for ... compensated for."

All these are good intentions but like the comment above - can they really be held to ?? Authorised?

Environment, Sustainability and Design

6. On a scale of 1 to 5 (with 1 being "strongly disagree" and 5 being "strongly agree"), how far do you agree with the following Environment, Sustainability and Design policies?

a) Policy ES01: Character and Design	1	2	3	4	5
b) Policy ES02: Landscape and Visual Impact	1	2	3	4	5
c) Policy ES03: Design Standards	1	2	3	4	5
d) Policy ES04: Space Standards	1	2	3	4	5
e) Policy ES05: Public Realm	1	2	3	4	5
f) Policy ES06: Creation of Safe Public and Private Spaces	1	2	3	4	5

Really, of course these are all good ideas, but they're just that. Will DPC³ challenge developers. Maybe, but why would they? "listen"

Environment, Sustainability and Design continued

g) Policy ES07: Heritage Assets

1 2 3 4 5

h) Policy ES08: Sustainable Design

1 2 3 4 5

i) Policy ES09: Areas of strategic Visual Importance

1 2 3 4 5

Do you have any comments on the above policies (please reference the policy on which you are commenting)?

See previous page. This is so frustrating because it's all pre in the sky idealistic stuff. If its a fight between DPC and the developers I don't trust you would hold to these principles

Employment and Business Support

7. On a scale of 1 to 5 (with 1 being "strongly disagree" and 5 being "strongly agree"), how far do you agree with the following Employment and Business Support policies?

a) Policy EB01: Local Employment Space

1 2 3 4 5

b) Policy EB02: Equestrian Related Development

1 2 3 4 5

c) Policy EB03: Communications

1 2 3 4 5

d) Policy EB04: Advertisements

1 2 3 4 5

Do you have any comments on the above policies (please reference the policy on which you are commenting)?

Re EB01 - local employment space, is it the Orchard being promoted as a site for building? what would happen to the businesses?

Transport and Getting Around

8. On a scale of 1 to 5 (with 1 being "strongly disagree" and 5 being "strongly agree"), how far do you agree with the following Transport and Getting Around policies?

a) Policy TG01: Highways and Traffic Calming	1	2	3	4	5
b) Policy TG02: Sustainable Transport	1	2	3	4	5
c) Policy TG03: Car Paring Standards	1	2	3	4	5
d) Policy TG04: Improved Bus Services	1	2	3	4	5

Do you have any comments on the above policies (please reference the policy on which you are commenting)?

Re 30mph speed limit - 56% of responders to the Village Survey wanted this. Can I say, "me too", but when might this happen? And all the other things requested?

Recreation, Leisure and Wellbeing

9. On a scale of 1 to 5 (with 1 being "strongly disagree" and 5 being "strongly agree"), how far do you agree with the following Recreation, Leisure and Wellbeing policies?

a) Policy RL01: Community and Leisure Facilities	1	2	3	4	5
b) Policy RL02: Retention of Assets of Community Value	1	2	3	4	5

Do you have any comments on the above policies (please reference the policy on which you are commenting)?

Of course, but where's the walk through the woods?

Infrastructure and Delivery

10. On a scale of 1 to 5 (with 1 being "strongly disagree" and 5 being "strongly agree"), how far do you agree with the following Infrastructure and Delivery policies?

a) Policy ID01: Infrastructure Delivery	1	2	3	4	5
b) Policy ID02: Dunsfold Surgery	1	2	3	4	5
c) Policy ID03: Mobile Phone Masts 	1	2	3	4	5
d) Policy ID04: Broadband	1	2	3	4	5
e) Policy ID05: Power Supply	1	2	3	4	5
f) Policy ID06: Wastewater Capacity	1	2	3	4	5
g) Policy ID07: Renewable Energy	1	2	3	4	5

Do you have any comments on the above policies (please reference the policy on which you are commenting)?

Re ID02 - investigations should be made into the dangers to health (esp. children) of mobile masts. Loads of research says NO.

11. Do you have any infrastructure project suggestions that Community Infrastructure Levy (CIL) receipts from developments could be used to fund?

No

Other Comments

12. Do you have any further comments on the Neighbourhood Plan?

The most significant parts of the NP are not covered here in depth, ie where's the building going to be? Separate letter to accompany this.

About You

13. What is your involvement in the Neighbourhood Plan area? Please tick all that apply.

- I live in the Neighbourhood Plan area
- I work in the Neighbourhood Plan area
- I own or manage a business in the Neighbourhood Plan area
- I have business interest in the Neighbourhood Plan area's new housing – as a developer, land owner, land agent or other professional
- I represent an official body that is consulted about new housing developments, re Green Belt, Area of Outstanding Natural Beauty, etc
- I work for, belong to or support an environmental cause or charity
- Other (please give details)

14. How old you?

- Under 18
- 18-24
- 25-44
- 45-64
- 65-84
- 85 and over

Thank you for providing your feedback.

Please return completed questionnaire to Dunsfold Parish Council, Unit 3, The Orchard, Chiddingfold Road, Chiddingfold, GU8 4PB

Thank you guys for doing this.

From: [Celeste Lawrence](#)
To: [Dom Veasey](#)
Subject: Fwd: Further development in Dunsfold
Date: 05 September 2022 08:16:15
Attachments: [PastedGraphic-3.png](#)

And the 4th response.

Regards

Celeste Lawrence
Clerk & RFO to Dunsfold Parish Council
Unit 3, The Orchard
Chiddingfold Road
Dunsfold, GU8 4LH
01483 200980



Begin forwarded message:

From: [xxxxx](#)>
Subject: Further development in Dunsfold
Date: 4 September 2022 at 17:02:40 BST
To: "[xxxxx.com](#)"
<[xxxx.com](#)>

Dear Dunsfold Parish Council

Further to notification of further housing development in the village we would like to lodge our joint objection to the proposed housing at Coombebury and Alehouse field.

When the suggestion of the first additional housing (Nugents Close) was initially made in the village, there was meaningful consultation with residents and it was designated for young local people. There was a questionnaire to see who wanted to continue to reside in the village and be given the opportunity to apply for a new residence. There was no protest and it worked successfully.

However time has moved on and there has been already two additional housing developments in the village, one to the north of Nugents Close and another by the cricket pitch. We certainly feel these developments are sufficient to house people who would like to live here. Dunsfold is a beautiful village and we have both been fortunate to live here for over fifty years and do not see the need for more pockets of development squeezed in at Coombebury and Alehouse field just for the sake of developers pockets, not caring who the housing is for. There has been no proper consultation with residents and no studies made to make sure additional housing is required.

With proposed development encircling the village ie Dunsfold Park one has to ask why is more housing needed specifically in the village.

Yours faithfully

xxxx/ xxxent from my

iPad

Neighbourhood Plan Consultation – Feedback

We write to give feedback on the draft Neighbourhood Plan. Our comments relate to both substance and process; indeed, in an exercise such as this it is inevitable that there is overlap between the two. We have endeavoured to engage with Survey Monkey but found that the form is not conducive to meaningful feedback as the responder is straitjacketed into responses which become logically incoherent. We will not therefore use Survey Monkey as a means of expressing our views.

We begin by making some general observations and then move on to specific concerns. Clearly, the adoption of a Neighbourhood Plan is a watershed moment for the adoption of planning policy in Dunsfold and we respect the hard work undertaken by the various members of the Steering Committee. As an exercise in local democracy it is critical that the community can have faith in the integrity of the whole process which should be completely transparent. It is important that reasons for decision-making should be readily discoverable on the face of the record. It is important also that decision making is evidence-based and takes account of independent third party assessment.

The allocation of sites fails the requirements of transparency, evidence-based decision making and independent third party assessment. In particular, the Coombebury site has been included in the face of considerable local opposition and despite having been rejected by both Waverley Borough Council and AECOM. Such development would represent a further extension of the settlement boundary and increased urbanisation to an already disproportionate block on the north eastern flank of the village. Furthermore, when the Parish Council supported the Gratton Chase development (which since 2016 represents the settlement boundary) it was on the basis that it would be a 'once in a generation extension' to that boundary. The many objections to development on the Coombebury site are comprehensively set out in the letter sent in July 2022 to the Inspectorate by the Dunsfold Planning Action Group. According to the AECOM assessment in 2018, developing this site would be "likely to have an adverse impact on the landscape" and the site was originally deemed unsuitable for inclusion.

In terms of process, the Coombebury site appeared among the site allocations as decided at a steering group meeting at a late stage in the process and only one week after Waverley Borough Council refused planning permission in principle for 21 units. No explanation has been provided by either the Steering Group or Dunsfold Parish Council. Minutes are brief and do not set out reasons for the apparent change of heart by those concerned.

On the other hand, the draft NP proposes an allocation of only 10 dwellings to the Springfield site. The 2ha site is much larger than Coombebury and could accommodate up to 32 houses. We understand that the landowner is amenable to a greater number of houses than the Plan proposes. The principle of development has already been accepted through the affordable dwellings development.

The principle of a strategic/green gap between the village and Dunsfold Park is to be welcomed but again there is no analysis supporting its location and in particular no explanation as to why the Coombebury site has been excluded from its scope.

For the reasons outlined, we request that the site allocations are re-considered and that the location of the strategic/green gap is re-examined. As matters stand, we are unable to support the draft Plan in current form.

xxxxxxx

DRAFT NEIGHBOURHOOD PLAN.

We set out below our comments on the draft Neighbourhood Plan. We understand that this has been a long process, and we appreciate the considerable time and effort devoted by those involved in the process. There is much in the draft Plan which is welcome; and it rightly recognises the very special nature of our village and the long term effects of over-development.

There are sections which could be improved. Parking seems to be mainly addressed in the context of new development. There should be more about the character and design of houses. Pond and tree management also need addressing.

However, in our view the draft Plan is deeply flawed because of the proposed allocation of sites for new development. We set out our reasons below. We have on previous occasions sought ways of decoupling the site allocations from the overall Plan, but without success. In our view, the Parish Council's current approach risks the rejection of the entire Plan for that reason.

The many objections to development on the Coombebury site are well set out in the representation in July to the Inspectorate by the Dunsfold Planning Action Group. And of course the original application was resoundingly rejected by Waverley. Local opposition has been clear for some time.

The site was originally deemed "unsuitable" in the Neighbourhood Plan process, yet mysteriously appeared (without convincing explanation) in the final proposed allocation. (There is a broader issue here – the extent to which the original criteria for development sites have been abandoned and the logical/technical basis for these allocations). There are issues around wildlife, trees, traffic, access and urbanisation. And Thames Water seem to be a semi-permanent presence in the village due to the wholly inadequate water infrastructure (We understand there are still issues about raw sewage etc. in Gratton Chase). We cannot put the case better than quote the 2018 AECOM assessment that developing this site is "likely to have an adverse impact on the landscape" (an example of the process drifting away from independent third party assessment). At the time permission was granted for Gratton Chase, the Parish Council described it as "a once in a generation extension to the village".

Alehouse Field is another example – a site in the conservation area and surrounded by listed buildings.

It is difficult to see any logic in the process adopted by the Parish Council, a process which needs to be more transparent and respectful of local opinion. In short, the proposed site allocations are inappropriate, unsustainable and (in some cases) simply undeliverable.

There are two broader factors to consider.

Many of us have been involved in the consultation on expanding the AONB, which could happen as early as August 2023. In fact, the area to the northeast of the village seems to have received more “hits” on the consultation map than anywhere else. Of course, once AONB status were granted, that would deter any further major development. The Waverley Local Plan (Policy RE3) calls for areas likely to be included in the AONB to be respected; and there is a real danger that any permissions granted in the meantime could actually undermine the case for AONB status.

The other factor is the so-called “domino effect”. We already have the Kitewood application for Coombebury (or more accurately, Land north of Gratton Chase); the appeal incidentally is for 21 houses NOT the 12 in the draft Plan. The owners of Coombebury Cottage itself have apparently now entered into an agreement with a developer. On 8 November there is the Hearing of the appeal to develop Chennels Field. The worst case scenario is a ribbon of development right along the main road from Gratton Chase almost up to the edge of the village. This makes even more pressing the need to defend the existing northern settlement boundary. Indeed, the draft Plan’s proposal for a “Green Gap” entirely chimes with this aspiration, albeit somewhat eccentrically it excludes the Coombebury site.

There is one possible solution already to hand – the recent planning application for 21 houses on Springfield. Based on recent discussions, the landowner seems amenable to significantly more houses than the draft Plan allows for, there seems a good possibility of incorporating a footpath to improve access and also the possibility of some provision for older residents.

For all these reasons, we would strenuously urge the Parish Council to reconsider its proposed allocation of development sites in the village.

XXXX

XXXX

XXXXX, XXXXX, XXXX XXXX

27 September 2022

Feedback Submission to Dunsfold Neighbourhood Plan Regulation 14 Consultation from 5th August to 3rd October 2022

Via email to: - xxx@btconnect.com

The above Consultation and this feedback submission concern the draft Regulation 14 Dunsfold Neighbourhood Plan (draft plan) and its supporting evidence on Dunsfold Parish Council (DPC) website. Reference will also be made to Appendix C of the Supporting Documents (Site Assessment and Selection July 2022 (SAS)) which is referred to in paragraph 5.18 of the draft Plan, and where site allocation issues are dealt with references to the draft plan include the SAS.

SUMMARY OF THIS FEEDBACK

There are the following important matters that need to be addressed, and changes made, with the help of Nexus before a final draft is produced for approval in a village Referendum. The principal problems are the following:-

- A. The site allocations for 16 of the 32 residual dwellings required under LPP1 do not comply with the draft plan Policies or Local and National policies, the 16 being the allocations of 12 for Coombebury and 4 for Alehouse Field. Furthermore these allocations do not respect the history and status of the sites which have been achieved over a long period and is summarised in C below.**
- B. The restriction to 10 dwellings on the Springfield site is not justifiable and the grounds given for it in the draft plan and the SAS are untenable as explained below. Also this treatment of Springfield has not respected the history and status of the site summarised in C below.**
- C. The draft plan fails to take into account the outcome of discussions and understandings reached by Dunsfold Parish Council (PC) with Waverley Borough Council (WBC) in 2014. These were respectively to achieve for WBC the doubling required by the then Inspector of WBC's Core Strategy market housing requirements for the plan period 2013-2032, which led to Dunsfold, like all towns and villages, being asked to identify sites for increased housing, in Dunsfold's case then 80 dwellings; and for Dunsfold a new site for its affordable housing requirement shown as needed by the 2013 survey conducted by the Parish Council (PC).**

The outcome was:-

- the selection of site 747, which has become Grattons Chase, to provide 42 market dwellings plus some affordable housing;**
- the extension of the settlement boundary around site 747 to prevent further development to the north;**
- the dismissal of the Coombebury site to the immediate north as unsuitable;**
- the opening up of the Springfield site (site 788), then being used for grazing, as being sufficiently close to the settlement to provide an 8 affordable dwellings development;**

- the consequential implied change in the status of Springfield recognising that the capacity of the remaining 2ha of the site could provide potentially up to 32 market houses for the WBC requirement, all of which would be subject to planning approval as to principle and numbers. This was subsequently confirmed by the 2018 LAA namely that on the basis of planning permission having been granted for the affordable dwellings development, the rest of the site was potentially suitable for development.
- On 26th February 2014 Natural England (NE) agreed to commence the AONB Boundary Review (the start of which was thereafter delayed until 2021) for which Dunsfold's AGLV had been identified as a candidate area since the reports of 2008 and 2013. WBC's Head of Planning agreed that the pending Review would be a material planning consideration in protecting Dunsfold's AGLV outside the settlement. This concept was built in to Policy RE3 in WBC's 2018 LPP1 which provides that pending the outcome of the Review all AGLV land must be treated similarly to AONB.
- Alehouse Field was dismissed as unsuitable, being in the Conservation Area, outside the settlement, surrounded by six listed dwellings and having been rejected for 3 or 4 dwelling developments a number of times since 1998, including by the Planning Inspectorate on appeal, and most recently six years previously in 2008 when WBC, the PC and 62 villagers had all made their opposition known. This was reinforced in 2017 by the WBC Conservation Area appraisal extending the Area over Oak Tree Lane and the common beyond up to the War Memorial.
- The above shows how sites 747 (now Grattons Chase) and 788 (Springfield) were seen in 2014 as capable of supplying the then entire WBC requirement of 80 dwellings. The outcome has been that 50 dwellings of that requirement have been built on those sites, and the settlement boundary has been extended round site around Grattons Chase under the LPP2 process reinforcing the unsuitability of Coombebury. Springfield suggested to SG in March 2021 20 houses on the remainder of the site, now increased to 21 by the current Planning application. With a density capacity of 32 the site could if necessary provide more. The Steering Group's lack of support for the site in its deliberations since 2017, its allocation of the site for housing but restricted to 10 dwellings in its final meeting on 20th October 2021, and the reasons for those decisions now contained in DPC's draft plan and the SAS to allow for the allocations to Coombebury and Alehouse Field have been, and continue to be, unsound and damaging to the protective positions which the history of the village has achieved.
- The draft plan allocation of dwellings on Coombebury should accordingly be removed as soon as possible: it is inconsistent with DPC's original objection in principle to the Coombebury application in

April 2021; and it undermines WBC's defence of their rejection of the application in the current Coombebury appeal, a defence which DPC should be fully supporting in the village interest.

D. The Site Assessment and Selection Principles in the SAS on which the site allocations rely, and on future developments need to be assessed, do not apply the Policies. An example is that the highly important Policy PO2 (Spatial Development) is not separately applied because its representative *Location Principle* is twinned for rating with the different *Coalescence Principle* and accorded a subjective combined rating which conceals how the Policy is being applied. This example together with the other problems illustrated in paragraph 20 below show that the SAS Principles are not fit for the purpose of assessing and selecting sites.

E. Contrary to the basic statutory requirements of Neighbourhood Planning the draft Plan does not have, or demonstrate it has had, special regard to the desirability of preserving or enhancing the character or appearance of the principal village Conservation Area, nor to the desirability of preserving listed buildings in the Conservation Area and their setting.

These matters concerns Alehouse Field, the six listed buildings around it, the Conservation area in which it and the listed buildings sit and the extension of that Area in 2017 to Oak Tree Lane and the Common beyond and up to and including the War Memorial. The absence of 'special regard' is indicated by: the complete absence in the Aecom Report or any NP supporting document, of the planning history of the site referred to above.

F. The draft Plan misrepresents the status of the current Natural England (NE) Boundary Review of the AONB. The Foreword states that Dunsfold's AGLV "is *expected to be included* in the planned extension of the Surrey Hills Area of Outstanding Natural Beauty". (My italics here and below).

This is opinion and not fact and is linked to the following incorrect statements throughout the text which say variously (my *italics*):-

- 'the extension of the AONB to cover Dunsfold AGLV *is awaited*' (1.11);
- 'Dunsfold's AGLV is *expected to be upgraded shortly* to AONB status' (2.5);
- 'the delay in extending the AONB status has resulted in considerable harm ...and that therefore it is imperative that *the envisaged extension* of the AONB is completed as soon as is practicable' (3.5);
- Dunsfold's 'Vision is of a village that has 'the *expectation* that it will be set within an Area of Outstanding Natural Beauty' (4.1);
- 'regard must be given to *the outstanding decision* to extend the Surrey Hills Area of Outstanding Natural Beauty (AONB) area to Dunsfold' (Core Planning Principle Policy P01 and repeated above the Overarching Principle of Dunsfold Parish Site Assessment

Principles in Appendix 2 of SAS). The first '*outstanding*' is used in the sense of '*awaited*';

- Dunsfold's AGLV area '*is shortly to be included in the pending Surrey Hills AONB extension*' (6.1);
- '*All of Dunsfold, except that which lies within Dunsfold Park, is currently due to be upgraded to AONB*' (7.15).

These statements are wrong and need to be corrected appropriately to convey *aspiration* rather than *expectation*. It is of the utmost importance for the village's AGLV to be included within the AONB boundary by the Review because after it the AGLV designation is due to be removed. However the inclusion of Dunsfold's AGLV cannot be taken for granted and it is not in the village's interest for the draft plan to convey that impression. The Review process is to be resumed in 2023. No one knows what the NE decision will be.

G. Other textual suggestions will be made below.

Further detail to illustrate points A to G in the above summary is provided below.

THE ALLOCATION OF 12 DWELLINGS TO COOMBEBURY

1. This is a .99ha AGLV, formerly greenfield and now wooded, site north of the settlement which pursuant to above 2014 understandings under C above has been extended around Gratton Chase. The developer applied for 21 houses. Some 90 or so villagers objected to the application, as did the CPRE and DPC, the latter writing an 'objection in principle' on 14th April 2021 saying:-
"The Parish Council objects to this planning application. Outside the current village settlement. This site is situated outside the current village settlement and the development will have a negative impact on the built form of the settlement. Further, as explained in the current Local Plan, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. Residents have already expressed their concern that, if allowed, this proposal will encourage further development to the north and east of this site. Such concern has been enhanced by land agents contacting residents using this application to encourage the sale of such lands for development. It is imperative that such concerns are shown to be baseless."
2. The DPC meeting of 14th October 2021 noted that the Coombebury Application had been refused the previous day. It reduced the Neighbourhood Plan team (the Steering Group (SG)) to three Councillors and two others and stated that it "would be meeting to discuss possible scenarios which would be circulated to all members. With Nexus completing the Plan the NP Team no longer needs to meet and would cease".
3. The SG met on 20th October 2021 with four of the above five members present with three previous SG members attending and the draft minutes on the DPC website state:-

"The latest version of the Site Assessment Report and a paper on options had been distributed to the Group. With the refusal of the Coombebury planning application for 21 houses last week, we had to find sites for at least 33. And it was expected that the developers of Coombebury would appeal. The latest version of the Site Assessment Report and a paper

on options had been distributed to the Group. With the refusal of the Coombebury planning application for 21 houses last week, we had to find sites for at least 33. And it was expected that the developers of Coombebury would appeal. After a long and wide-ranging discussion the following site allocations were unanimously agreed:

DNP01 Alehouse 4
DNP02 Coombebury 12
DNP03 Wetwood Farm 7
DNP08 The Orchard 4
DNP20 Springfield 10
Total allocations in Plan 37

This gives 103 houses against the minimum target of 100

Next Steps Lynne Hamill would provide a note for circulation to the Parish Council for information and the information would be provided to NEXUS to produce the draft Plan to be approved by the Parish Council” and that it “was not expected that the Group would need to meet formally again”.

4. These allocations became known and a matter of concern for a number of villagers. The SG Terms of Reference had provided that the plan-making process remained the responsibility of the Parish Council as the qualifying body and that the SG would regularly report back to the Parish Council for endorsement of decisions taken.
5. On Thursday 4th November 2021 DPC Councillor John Gray, who was also a WBC Councillor, submitted a Motion for the DPC Meeting of 11th November to the DPC Clerk, copied to the Chairman and Vice Chairman of DPC, calling for ‘the minutes of the recent SG allocating sites for the neighbourhood plan to be first put forward to the full Parish Council for discussion and approval’ and proposing:-
 - ‘That the site allocations are endorsed by the Parish Council at its meeting on 11th November and the following is first explained to members
 - a. The reasons why the Coombebury site has been included when it was rejected at a Waverley Planning Meeting – other sites were rejected by planning but not included or reconsidered
 - b. Confirm land owners endorse the new allocation and explain how the sites can be limited to these lower numbers
 - c. Explain why the steering group has left out the school site and justified this by saying that the plan would be rejected at Referendum.
 - d. Explain why the steering group believes that the Coombebury site will not similar to the school site be rejected at referendum.’
6. Cllr Gray’s Motion was not put on the Agenda for the 11th November meeting. No reason has been given for this.
7. The DPC Minutes for the 11th November 2021 meeting stated under Neighbourhood Plan:-

“It was reported that Cllrs Hayward and Jones had had a Zoom meeting with two members of the Miller family regarding the Miller Lane site. These representatives had indicated that a proposal limiting their site to 10 dwellings would not be acceptable to the land owners since the balance of the site would have no feasible use but that the family might be prepared to progress a proposal which provided 20 dwellings together with community allotments for use by village residents.

It was reported that it had been indicated that following the refusal of the North Gratton Chase application the applicant was intending to appeal and was working to submit such appeal by the end of December.

In light of these reports and the considerable concern in the village regarding the Steering Group's conclusions on the site allocations it was proposed that the Chairman should call an Extraordinary Meeting of the Parish Council to discuss the draft Neighbourhood Plan. The proposed date of 19th November was dismissed as 4 councillors could not attend. Clerk to find out about hall availability for the w/c 23rd Nov."

8. No such meeting has been called or held. At subsequent DPC meetings over the ensuing six months the Council has only been asked to approve or otherwise a resolution to adopt a draft Plan referred to or presented to it. There has been no discussion at any DPC meeting of the merits or demerits of site allocations, draft NP proposals or a draft NP plan.
9. The above SG allocations (with the exception of a reduction of the Orchard allocation from 4 to 2) form the basis of the site allocations in the draft plan. In relation to Coombebury no explanation has been provided as to:-
 - why the DPC objection in principle of 14th April 2021 to development on the site was being abandoned when it had just been upheld by WBC's refusal of the planning application;
 - how the allocation of 12 dwellings to the site could do other than jeopardise the defence of the appeal brought by the Coombebury developer which according to the draft SG minutes was expected;
 - why three persons, who had not been included in the NP Team reduced by the DPC meeting of 14th October, attended and voted at the SG meeting;
 - How at this last meeting of the SG the reduced membership could have had authority to decide site allocations without submitting a report to DPC for approval of the decisions as required by the SG Terms of Reference;
 - Why that SG meeting had authority to do other than merely discuss 'possible scenarios which would be circulated to all members' as instructed by DPC on 20th October 2021;
 - why the final minutes of the meeting have not been produced given that the chairman subsequently stated that the Vice Chairman had not voted due to a non-pecuniary interest and that corrected minutes would be produced.
10. The processes employed for deciding the draft plan allocations for all the sites has been unsound in relation to the procedures employed and the lack of openness and community engagement.
11. The allocation of dwellings to the Coombebury site as an AGLV field now a small forest outside the settlement is in breach of draft plan Policy P02 (Spatial Development) and Policy RE3 of LPP1.

THE ALLOCATION TO SPRINGFIELD OF 10 DWELLINGS

12. Neighbourhood planning should have regard to, and respect, the status of sites and the content of the relevant LAA. That is not to say that such status and content is binding but it does mean that neighbourhood planners need to have regard to them and have valid reasons for diverging from them. No such reasons are apparent.

13. As stated in B and C above the development potential of the 2ha remaining of the Springfield site to the rear of the roadside affordable housing development was recognised by both WBC and PC in 2014 and confirmed as above by the WBC LAA of 2018 which found it to be only suitable site in Dunsfold for fulfilling the remainder of the housing requirement for the village under LPP1.

14. The initial site assessment of Springfield in the Aecom Report of November 2018 commissioned by SG also found Springfield to be the only site in the village with a green RAG rating.

15. The SG minutes of 4th December 2018 (not uploaded to the website until 27th August 2019) noted that the Aecom Report had not carried out a full proforma assessment of a number of sites including Springfield. However the minutes reported that “this is as far as we will get with AECOM on this matter.”

A Post meeting note with those minutes reported that AECOM explained:-

“We haven't produced a proforma for each site as our approach is to filter out sites that are clearly unsuitable for development either because of a physical reason or because it would be in clear conflict with national planning policy or the strategic policies of the local plan. It is the sites that have a clear reason for discounting that haven't been through the full assessment and therefore have no proforma.”

The minutes further stated:-

“It was noted that the Report had omitted to identify Springfield (site 20) as non-clay and therefore of important agricultural value”.

16. There was no explanation of why Aecom could have concluded that Springfield was ‘clearly unsuitable for development’ when the preliminary assessment in the Report found the site to be the only suitable site in the village. The Aecom Report states that it went through six revisions between 1st June 2018 and 21st November 2018 all ‘following DPC comments’. If SG were concerned about the absence of a full proforma assessment, or the inconsistent negative assessment they should, as the commissioning body, have sought an explanation from Aecom. No explanation appears to have been sought or become available. The implication of SG minuting that Springfield was ‘of important agricultural value’ indicates that SG were content for Springfield not to be further considered for development beyond the 8 affordable dwellings at the front. The application for that development in WA/2017/1815 included detailed soil assessments of the site which had been used for grazing for many years, and the agricultural value of the site did not appear to be of particular note.

17. For most of the time between the Aecom Report of November 2018 and the March 2021 SG consultation of the village on sites, the Springfield site does not appear to figure in SG’s plans for the residual housing requirement.

18. In March 2021 SG’s circular to the village asking for villagers to comment on sites noted that SG’s review of sites took account of:-

- the need ‘to stop Dunsfold coalescing with Dunsfold Park’ and so considered it ‘important that development to the east of the village is avoided’ and
- that ‘a petition signed by 97 residents called for no further development in the north of the village’.

In relation to Springfield the circular stated that SG were submitting the site for consideration for a possible 10 dwellings, but that the site was not recommended, noting that ‘the field is good

agricultural land, is remote from the village, has poor pedestrian access and is just 410 metres from Dunsfold Park'. It put the number of houses being proposed at 32.

Shortly after this SG via eNews to the village circulated a proposal received from Springfield stating that they were only seeking 20 dwellings with a description of the proposal, which SG noted but said it did not change their view that the site was not suitable.

The circular did not give the date of the above petition from 97 residents nor did it give the full text. It was discovered subsequently to have been March 2018 and read in full as follows:-

"We, the undersigned, object to the disproportionate amount of housing which is proposed for the North end of the village, due to more suitable central sites being available, particularly site number 788 (Springfield). It is felt that the established Griggs Meadow and Windways settlements, together with the proposed site 747 (Grattons Chase) are enough without expansion into what will become an outlying suburban estate and ruining the nature of this end of our village."

The village should have been informed earlier about this petition issued three years before. It was misleading to release it three years later without revealing that the 97 petitioners were actually seeking any further development to focus on Springfield.

Paragraph 5.8 of the draft plan also refers to this March 2018 petition from 97 residents but again without including the part where the residents focus on Springfield being a desirable site for the village's housing requirement. The paragraph should provide the full text of the petition.

19. The above pattern of negative and unbalanced discrimination against the site is repeated in SG's proposal in the draft Plan to allocate the site but limit the housing to 10 dwellings for the reasons given in paragraph 4.5 of the SAS. This states that although Springfield was strongly supported by villagers, SG's site assessment of it found 'the highest number of negative outcomes compared to the other preferred potential site options. In view of this SG decided to retain the site as a preferred allocation but to limit the quantum of development to 10 dwellings'.

The so-called 'negative outcomes' are described below and are not sound, nor can SG justify why the 'other potential site', which can only be Coombebury, is 'preferred' given the above comments on that site.

20. It is impossible to understand the soundness and justification of the **RAG** assessments of sites generally and Springfield here, under the SAS the Site Selection Principles because of the 15 Principles for Assessment and Selection, each of which has its own separate RAG colour, the application of such separate colour rating is not shown for 10 of the 15 Principles. That is because each of those 10 Principles is twinned with another and a single RAG rating is selected to cover both principles notwithstanding that each represents a different topic or concept. Thus the resulting RAG assessment chosen for two thirds of the Assessment Principles is subjective, with the rationale not being revealed nor the justification capable of being known.

21. The following are comments on the RAG ratings in SAS for Springfield, and notably the 'negative' five red ratings in it:-

Scale and Density are rated together as Red: The comment merely states that 'the assumed density is above 15 dph'. **Comment:** The actual density of the proposal of 20 dwellings is 10dph which should therefore be green. The rating for Scale should be amber because the LAA analysis is that it is potentially suitable because of the development of affordable dwellings built at the road front of the site.

Land use is rated Red: **Comment.** According to the assessment element in the Principle, and because as above this is a 'potentially suitable' mixed site, the assessment should be amber.

Location and Coalescence is rated Red: The text says: 'the site is outside the settlement and would materially contribute to narrowing the gap between Dunsfold Village and Dunsfold Park'. **Comment:** with regard to **location** as the 2018 LAA said 'The site does not adjoin but is reasonably well related to the settlement boundary'. This proximity to the settlement in itself, as has been the case in other SG assessments, can justify an amber rating. As to **Coalescence**, under the Green Gap Policy in the supporting documents of July 2022, which essentially overtakes and implements the Coalescence policy, the Springfield site has been excluded from the Green Gap (unlike its inclusion in the December 2021 draft Green Gap Policy), so the rating should now be Green.

Natural Environment is rated Red: the text repeats the above point concerning coalescence saying 'development would detract from the openness between the village and land to the east (Dunsfold Park)'. **Comment:** this is the same point as under coalescence above: since the site has been excluded from the Green Gap policy the textual comment is invalid, and the rating cannot be worse than amber.

Access and Highways is rated red: the text states that there is no footpath. **Comment:** there should have been created a footpath for the front affordable development. The Springfield application says that it will create a footpath, which will service all dwellings on the site, and suggests how this could be done. There is already an **access** built from the road into the site called Miller Lane. The rating should therefore be green.

These points indicate that the SG finding that Springfield showed 'the highest number of negative outcomes compared to the other preferred potential site option', and as a result cannot be allowed more than 10 dwellings, is without foundation, and another example of discrimination.

THE ALLOCATION OF FOUR DWELLINGS TO ALEHOUSE FIELD

22.C above referred to Alehouse Field being in the Conservation Area, outside the settlement, surrounded by six listed dwellings and having been rejected for 3 or 4 dwelling developments a number of times since 1998, including by the Planning Inspectorate on appeal, and most recently six years previously in 2008 when WBC, the PC and 62 villagers had all made their opposition known. It also referred to the reinforcement of this status in 2017 by the WBC Conservation Area appraisal which extended the Area over Oak Tree Lane and the common beyond up to the War Memorial. See the photograph below which shows the Oak Tree Lane footpath in the middle of the extended Conservation Area below Alehouse Field in the Conservation Area and the surrounding six listed buildings.



On 1st March 2021 13 residents being owners of 5 of the 6 listed buildings surrounding Alehouse Field and other adjacent properties (of which I was one have acquired Oak Tree Cottage in 2019) wrote to the chairman and members of the Parish Council, copied to the members of SG, setting out the history and status of the site. The purpose of the note was to inform DPC of the concerns of residents and why the then proposed development was misconceived; why the field should be removed from consideration as a site for development in the Emerging Neighbourhood Plan; and to seek a meeting to discuss this without delay.

No response to this request was received. The SG chairman wrote that the residents would have their opportunity to comment when the Regulation 14 consultation began.

The following extracts will serve to refer to the history and status of the site.

“AGLV and AONB principles

The village’s land is AGLV and specifically included in the areas proposed for inclusion in the Surrey Hills AONB due to its beauty. Pending the AONB Boundary review the village’s AGLV land under Local Plan Policy RE3 is to be treated in accordance with

the principles which apply to the AONB, namely that it is of national importance, and a priority, that the character of the landscape must be protected and enhanced. The proposed development cannot comply with this requirement.

HERITAGE STATUS

Alehouse Field is wholly within the village Conservation Area. It is adjacent to but outside the village settlement. It is surrounded on the north, east and south by 10 dwellings of which 6 are listed whose amenity and setting under Local Plan policies must be protected and not harmed.

PLANNING HISTORY CONSISTENTLY REJECTED DEVELOPMENT

Development proposals on Alehouse Field for 3 houses were rejected under the 1993 and 2002 Local Plans, the Planning Inspectorate upholding the rejection of WA/1998/0201, stating that the character and appearance of the Conservation Area and the setting of the listed buildings would not be protected and material harm would be caused to the rural character of the landscape surrounding the village. Similarly WA/2008/0632 proposing 3 dwellings was rejected for the same reasons. Waverley's Land Availability Assessment (LAA) of 2016 prepared in conjunction with the new Local Plan rejected Alehouse Field for housing development because of its impact on the AGLV and the setting of the village.

Consistent with the new 2018 Local Plan the LAA of 2018 whilst noting that the field was "now being promoted for older peoples' housing (C2)" stated that:-

"The development is likely to have an adverse impact on the countryside and rural character of the settlement. It is also within the Conservation Area and adjoins several listed buildings along Oak Tree Lane and Sun Inn Road and it is likely that development of this site would have an adverse impact on the character and appearance of the Conservation Area and the setting of the listed buildings'."

The Aecom report of November 2018 was defective in providing no response to the question: 'Have there been any previous applications for development on this land? What was the outcome?' "

The draft NP makes it clear that C2 retirement housing is not being proposed

FURTHER COMMENTS ON TEXT

- 23.** The foreword states that 'Dunsfold is unique within Waverley Borough.' Some reason for this claim of uniqueness needs to be stated here, whether it concerns 'the unique feature of having the very large common at the centre of the village' (as mentioned in paragraph 2.9 of SAS) or something else.
- 24.** In section 4 the principles **PP1 to PP7** need an eighth somewhere in the mix: 'To prioritise the protection of our Conservation Areas, Listed Buildings, Common land and surrounding countryside'.
- 25.** Paragraph 10.4: this needs to start with the words "The Dunsfold branch of..." (Chiddingfold Surgery closed....)

RESPONSE TO THE DUNSFOLD NEIGHBOURHOOD PLAN REGULATION 14 CONSULTATION

I have tried to complete the survey monkey return online, as suggested by Dunsfold Parish Council, and for several reasons but mainly because I find it difficult to have in mind the various policies when answering each section, I have given up. Instead, I have therefore decided to phrase my response as under.

I recognise that a lot of research has been undertaken to produce the plan and as a resident of Dunsfold for in excess of 30 years I am grateful to those involved. However, I do not understand the logic behind some of the conclusions arrived at.

VISION

I agree with the overall vision, but some planning principles need further thought and examination. Where I part company with this vision is the seemingly quiet acceptance of the number of housing units summarily imposed, presumably by Waverley, on the Parish and it would be good to make comparison with similar communities.

HOUSING

I accept that there must be some development within the village, if only to keep it alive, and that there should be a mix of size and styles. However, I am totally against self-build because experience has shown me that these always provide problems for neighbouring areas with noise, pollution, over-run, and irregular parking on a 24 hour/7 day a week basis.

There is a shortage of affordable homes and if the village is to grow it needs more units within this category.

SITE ALLOCATION

The glaring anomaly is the Coombebury site which was deemed unsuitable for development in previous versions of the plan. It is low lying, floods every year and has no access other than a road only designed for the existing development – not an extension to it. This should never have been allowed to be included within the plan and should now be included in the Dunsfold Green Gap area. Grattons Chase (the once in a generation extension to the village) was to be the northern boundary for development in Dunsfold (north and east) and Coombebury was resoundingly turned down for this reason by Waverley BC last year. This inclusion proliferates the extension to the village by stealth because we now hear that Coombebury Cottage, and its land is likely to put forward an application for development. In addition, the land immediately to the north of that, Chennels, is the subject of an appeal which has already been rejected and turned down on Appeal. All of these are outside the settlement boundary and which, as I understand it, are in conflict with PO2. Also, I do not follow the argument that there should be no development in the vicinity of

listed buildings. If that principle was followed then there would have been no new building in towns and villages for centuries. It is a matter of sympathetic planning and blending of styles.

NATURAL ENVIRONMENT

Generally, these are acceptable. Much is made of areas of AGLV and ANOB and my comments on the site allocations noted above will impact greatly on the latter if allowed.

INFRASTRUCTURE

This is ill thought out.

1. One assumption made by the consultants is that if Coombebury is allowed, residents would walk to the village centre and the shop. This demonstrates a level of unparalleled naivety. They may walk their dogs around The Common, but they will take the easy option and drive to the shop and centre thereby causing yet more congestion.
2. There are perennial water and sewage problems which has necessitated the closure of roads and parts of The Common. I am yet to be convinced that sufficient work has been carried out to cope with existing demand let alone further development in the village. There must be an embargo on all development until the village is satisfied that this has been carried out.
3. Much talk has been made of improving mobile phone reception and broadband speeds. Until the Parish Council actually does something about this the waffle will continue and nothing will be achieved.
4. Traffic and speeding vehicles through the village continues unabated. Surrey County Council highways believe, somewhat naively, that speeds through the village are largely adhered to. This ignores the fact that Surrey Police carried out a covert survey some years ago which proved that the highest recorded speed in the centre was 83 mph as well as many recorded at well over 60 mph. The speed limits do not cover the settlement boundaries, there is no traffic calming and signage is inconsistent. There has been one fatality and numerous accidents. How long must we wait until another serious incident occurs?

CONCLUSION

While there is much to commend it, this Neighbourhood Plan should be reconsidered particularly as regards site allocations are concerned.

XXXX

XXXX

XXXX

XXXX

XXXX

1st October 2022

Dunsfold Parish Council
Unit 3, The Orchard
Chiddingfold Road
Dunsfold
GU8 4PB

2 October 2022

Dear Sir or Madam

1. I am writing to you with my response in relation to the Regulation 14 consultation on the draft Dunsfold Neighbourhood Plan. My comments are limited to the Springfield site, identified as site HA5.
2. There are many reasons why this site should not be built upon at all, and/or why the number of new houses should be very strictly limited. These are matters of policy and planning that have been the subject of submissions by others, which I fully endorse but do not repeat.
3. My family and I live in Springfield House, one of the two properties immediately adjoining the north-west boundary of site HA5:



4. The field on which construction is proposed runs the entire aspect of my home, as shown by the following photograph, taken from my garden:



5. From my perspective, construction on the Springfield site, in particular in the manner and to the extent now proposed by the landowner, would have a seriously damaging impact on my residential amenity and quality of life.
6. The result of construction on this site would be that the new homes would:
 - (a) look directly into my living room, family room, kitchen, conservatory, two bedrooms and two bathrooms;
 - (b) look directly over my garden;
 - (c) obstruct light to a large part of my property.
7. This would amount to a complete violation of my family's privacy and our right to enjoy our home.
8. What I please ask, therefore, is that if the village is minded to support development on this site, it imposes a condition that (i) a landscaped edge is provided to the perimeter of the development facing the north-west boundary, and (ii) a gap of at least 20 meters is left between the perimeter of the development and the boundary with Springfield House and Bridge House.
9. It is my sincere hope that members of the village will recognise and value the rights and interests of those of their neighbours who will be profoundly affected by the potential development when formulating policy in relation to it.
10. What I am suggesting is, in the context of a 2.5 hectare site, a minor condition that would not stand in the way of the site's development as envisaged by the Draft DNP, but would afford some protection to me and my family from the worst effects of the development in our back garden.

Yours faithfully

xxxxx

xxxxx

A Mill Lane resident. 23.09.22.

Dunstford Future Planning.

1. Dunstford is a VILLAGe. To be kept within its boundaries and not developed into a "Small Town".

2. There is already an ongoing problem with WATER - Thames waves are regularly in the village - ~~for~~ roads up and on/off supply. This, and the ELECTRICITY suggest there is no further room for more development.

3. There should be no further

development north of Grattons Chase. This would divide the village in two (isolating) and ultimately lead to a join up with Hascombe.

4. This is a village and needs
its green and open spaces -
i.e. the land with/ adjoining
Comberton Cottage.

An A.O.D.N.B. would be
excellent in keeping our
village green.

New houses should go where
the facilities are - buses/trains
theatres/sport -.

5. We must support the rural
and country side - not a
developer's greed.