

Appendix J: Regulation 14 Draft Plan: Statutory Consultee Submissions



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BY EMAIL ONLY

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XXXX

XXXX

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Date: 3rd October 2022

Dear Ms xxxx,

Dunsfold Neighbourhood Plan Regulation 14 Consultation

Thank you for consulting Waverley Borough Council on the Regulation 14 version of the Dunsfold Neighbourhood Plan.

We wish to commend the Parish Council on having reached this stage in the preparation of the Dunsfold Neighbourhood Plan. We have attached a number of comments and suggestions that we hope will be helpful.

As you will see from the attached comments, we would welcome the opportunity to further discuss some of the policies within the Dunsfold Neighbourhood Plan before it is finalised. Please contact the Planning Policy Team at your convenience, to arrange a meeting.

We look forward to working closely with you over the coming months to support the progress of your Neighbourhood Plan to the next stage and ensure it has the greatest chance of success at examination.

Yours sincerely,

XXXX

Interim Planning Policy Manager



Brief Description	Page Number	Para / Policy Number	Comments
General			
Although we note paragraph 3.7, as we highlight in the specific comments below, it is unnecessary to duplicate policies from LPP1, Local Plan 2002 or the emerging LPP2. It is unnecessary to duplicate policies on the same subject matter, unless the Dunsfold Neighbourhood Plan adds an extra level of detail specific to the local features of Dunsfold.			
Throughout the policies within the Plan, there are references to “all development”. We would query whether this is the intention of the Neighborhood Plan. If it is then the Council consider that in some cases the policy requirement may be overly onerous for domestic schemes, e.g. extensions.			
Please note that greater weight will be given to specific policy requirements within decision making. Although supporting text to the policies can add detail or support the implementation of the policy, requirements in the supporting text will not have to be met. We suggest further consideration is given to whether there are any aspects of the supporting text throughout the plan which should be incorporated within the policies.			
Neighbourhood plans should be prepared positively, there a few instances whereby the Plan uses wording which may not be considered to be positively prepared (e.g. will not be permitted/supported). We would encourage you to consider whether alternative wording could be used, to ensure that the Plan is read as being positively prepared.			
Please be reminded that the Neighbourhood Plan (and all relevant documentation) must comply with the requirements of The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018.			
Foreword			
Foreword	3	Foreword	The NPPG on Neighbourhood Planning says that neighbourhood plans should be prepared positively. The role of a neighbourhood plan is to plan positively for the future of the area it covers and set out policies to guide future development. Whilst it is right that the neighbourhood plan recognises the planning issues for the parish and the challenges they present may well be one of the drivers for the local community to produce a neighbourhood plan, we are of the view that the general tone of the foreword undermines the role of the neighbourhood plan in planning positively and suggest that further consideration is given to this section of the plan.

Foreword	3	Foreword - Para 6	<p>We understand the local wish for affordable housing to be prioritised for people with a local connection, but question how this will be enforced.</p> <p>Shared ownership funded by Homes England cannot be restricted to households with a live or work connection to the borough, and so will also be unable to be restricted to households with a live or work connection to the Parish. Under Homes England Funding Guidance, unless the scheme is a Rural Exception site, meeting the criteria of Local Plan Policy AHN2.</p> <p>Likewise, affordable homes to rent (for either affordable or social rents) will be advertised on the Council's Choice Based Lettings system, and households across the borough will be able to apply, unless the scheme is a Rural Exceptions scheme.</p> <p>First Homes will be allocated to people with a live or work connection to the borough for the first 3 months of marketing under Government guidance.</p>
1. Introduction			
Factual Correction	8	1.2	<p>The minerals and waste local plans produced by Surrey County Council also form part of the Development Plan; for factual correctness, we suggest amending para 1.2 to make reference to these.</p>
Consistency	8	1.3 & 1.4	<p>We would suggest that the following paragraphs are amended for consistency with the terminology used in national planning guidance:</p> <p>Para 1.3: "To align with the higher level Development Plan strategic policies set out in LPP1 this Neighbourhood Plan has also been prepared to cover the same plan period."</p> <p>Para 1.4: National guidance stipulates that Neighbourhood Plans</p>

			cannot provide for less development than that set out within the strategic policies set out in LPP1 higher level Local Plan, in this case, LPP1.
Development Plan - Factual Correction	8	1.5	<p>The text does not currently reference all documents which make up the development plan (e.g. saved policies from Local Plan 2002 and the Surrey County Council minerals and waste plans).</p> <p>We suggest it may be better to refer to an adopted neighbourhood plan becoming part of the statutory development plan, and that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. Reference to the 'Development Plan' will avoid the need to list all documents that make up the development plan.</p>
Query wording	9	1.8	We would query the use of the word 'unsustainable' is appropriate given the strategic policies within LPP1.
Area of Outstanding Natural Beauty (AONB)	9	1.11	The review of the AONB is in progress and therefore the outcome of the review is not known. The assessment of the areas has not yet concluded to identify candidate areas which themselves will be further assessed for desirability. It will then be up to Natural England to consider the evidence and any change to the boundary will be subject to statutory consultation. The neighbourhood plan therefore cannot be based on an assumption that the AONB will be extended to include Dunsfold. For more information on progress: Surrey Hills AONB Boundary Review (surrey-hills-aonb-boundary-review.org).
Factual Correction	9	1.12	<p>The Dunsfold Park Garden Village Supplementary Planning Document (SPD) was adopted in February 2022.</p> <p>Suggest amending the final sentence:</p> <p>"If this arises, the Parish Council will ask WBC should to limit any further increase in Dunsfold's housing numbers."</p>

			Any review of the allocation at Dunsfold Aerodrome/Park and housing number for Dunsfold would require a review of the strategy in LPP1, which would be subject to considerable work, consultation and a public examination.
Qualifying Body	10	1.13	We suggest that careful consideration is given to the wording of this paragraph to ensure that it accurately reflects the fact that the Parish Council, as the qualifying body, retained overall responsibility for preparation of, consultation on and submission of the neighbourhood plan, even though the detail of the process was carried out by the steering group.
Factual Correction	6	1.14	Amend text to: "It will then proceed to an Examination carried out by an independent examiner planning professional employed by the Planning Inspectorate. "
Consistency	6	1.17	<p>There are a number of policies within the emerging LPP2 which will apply to development within or outside settlement boundaries. To ensure that the settlement boundaries, as per the Dunsfold Neighbourhood Plan, are used for the application of such policies we would suggest that the same terminology of 'settlement boundary/boundaries' is used rather than 'settlement area'.</p> <p>We therefore would suggest the text is amended to:</p> <p>"Dunsfold Village" is the area contained within the settlement boundaries area (Figure 1.1).</p>
2. A Portrait of Dunsfold			
Area of Outstanding Natural Beauty (AONB)	12	2.5	Please see above comments on para 1.11.
3. Planning Policy Context			
Development Plan – Factual Correction	15	3.2	As per our earlier comment, the text does not currently reference all documents which make up the development plan

			(e.g. saved policies from Local Plan 2002 and the Surrey County Council minerals and waste plans).
Area of Outstanding Natural Beauty (AONB)	15	3.5	Please see above comments on para 1.11.
Factual Correction	16	Table 3.1	<p>We would query whether this table is intended to be a comprehensive list or a list of what the Parish Council consider to be the relevant documents. If it is the former, then there are a number of Surrey County Council minerals and waste DPDs which are missing.</p> <p>Additionally, given that the Plan is envisaged to last until 2032, it may be worthwhile omitting dates from this table. If the Plan is successful at Referendum, it is likely this section will very quickly become out of date.</p> <p>Although the Neighbourhood Plan does not focus on the area of Dunsfold Park within Dunsfold Parish, it is still within the Neighbourhood Plan area and therefore the list should include reference to the Dunsfold Park SPD.</p>
Factual Correction	16	Table 3.1 – Waverley Borough Local Plan (saved policies)	Amend text to “These will be deleted superseded once the Local Plan Part 2 (below) is adopted.”
LPP2 Policies	17	3.4	<p>As previously discussed and emphasised throughout our comments, it is not considered necessary to duplicate emerging Local Plan Part 2 (LPP2) policies. Until the adoption of LPP2 there are still the retained Local Plan 2002 policies and policies in LPP1, which are compliant with the NPPF.</p> <p>It may be that the policies which are currently in the Pre-Submission version of LPP2 will be amended as part of the independent examination process. Therefore, there could be a difference between the policies in LPP2 (once adopted) and the policies in the Dunsfold Neighbourhood Plan. This could cause problems when assessing and determining planning applications.</p>

			The Neighbourhood Plan could consider removing reference to LPP2 policies and instead, where necessary, to prepare policies which are Dunsfold specific.
4. Vision and Key Planning Principles			
Plan longevity	18	4.1	To ensure that the Plan does not quickly become out of date we would suggest the following amendment: “This Section of the Neighbourhood Plan sets out the Vision for the Plan and captures the community’s view of how Dunsfold should be developed as a place to live and work in the next 11 years for the Plan period, up to 2032. ”
Consistency	18	PP1	For consistency with LPP1, we would suggest: “PP1: To identify an appropriate amount of land within the Parish for the development of new housing to meet the minimum target set in the Waverley LPP1, with the intention of delivering homes that would meet the need identified within the existing community, including for affordable housing
Area of Outstanding Natural Beauty (AONB)	20	Policy P01: Core Planning Principles	As set out above, the review of the AONB is in progress and therefore the outcome of the review is not known. It is premature to suggest that regard should be given to a decision which has not yet been made. The policy as worded implies that the whole Evaluation Area EA13 will be included in the AONB. The assessment of the areas has not yet concluded to identify candidate areas which themselves will be further assessed for desirability. Please refer to: https://www.surrey-hills-aonb-boundary-review.org/discover .
Settlement Boundaries – Terminology	20	Policy P02: Spatial Development of Dunsfold	There are a number of policies within the emerging LPP2 which will apply to development within or outside settlement boundaries. To ensure that the settlement boundaries, as per the Dunsfold Neighbourhood Plan, are used for the application of such policies we would suggest that the same terminology of ‘settlement boundary/boundaries’ is used rather than ‘settlement area’.

Settlement Boundaries – Definition	20	Policy P02: Spatial Development of Dunsfold	We would query why the Dunsfold Neighbourhood Plan does not appear to amend the settlement boundaries, from that proposed within the emerging Local Plan Part 2. We particularly query why the proposed allocation close to, or adjoining, the settlement boundary are not proposed to be incorporated within the settlement boundaries for Dunsfold. We recommend that further thought should be given to whether amendments to the settlement boundary should be made.
Consistency with national policy	20	Policy P02: Spatial Development of Dunsfold	<p>This policy appears to apply Green Belt level protection to the Countryside Beyond the Green Belt – this approach is not compliant with the NPPF.</p> <p>Additionally, some of the plan's site allocations are in conflict with requirements of this policy – for example HA2: Coombebury which is outside of the settlement boundary/area but is not previously developed land.</p> <p>We would also query the justification for Part c), as it appears to go beyond the NPPF paragraph 80 (a).</p>
Correction of Error	22	4.2	There appears to be a typo within this paragraph.
Query	22	4.3	We would query the rationale behind the inclusion of the figure '3,600' for the number of dwellings proposed at Dunsfold Park; as LPP1 allocates the site for 2,600 new dwellings.
Consistency with national policy	22	Policy P03: To prevent coalescence of Dunsfold settlement with Dunsfold Park	<p>We consider that the first part of the policy is consistent with other coalescence policies.</p> <p>However, the second part of the policy, restricting development to agriculture and/or equestrian uses, is too restrictive given that it covers a large area of land and applies a more restrictive approach than is applied to the Green Belt in national policy – this approach is not compliant with the NPPF.</p>

			We suggest that greater consideration is given to criterion (c) of paragraph 18 in the Dunsfold Green Gap Report which sets out that the proposed Dunsfold Green Gap should 'be no greater than is necessary to prevent coalescence and to maintain physical and visual separation'. The current proposed Green Gap covers a very large area and does not meet this criterion.
5. Housing			
Terminology	Chapter 5	Chapter 5	We would suggest use of "affordable homes" rather than "social housing" throughout the Plan.
Factual Update	24	5.2	The affordable housing stock as of 1 st April 2022 is 46 Waverley homes and 35 housing association homes.
Housing Figures	24	5.3	We suggest that this paragraph specifies the base date for this data – i.e. "As at 1 April 2022" rather than just "To date" for the avoidance of doubt. The details of the applications which make up the completions and permissions may be better presented in a summary table or set out in full in an appendix to the plan.
Clarity	24	5.4	Suggested amendment: "In light of the latest WBC monitoring data for dwelling construction completions and planning approvals for new dwellings in the Parish, the Neighbourhood Plan needs to allocate land to deliver at least a further 32 dwellings in the period up to 2032."
Housing Objectives	25	5.10	H1: We would suggest this refers to the 'minimum' number of homes required by LPP1 H4: See comments on forward regarding local connection to Dunsfold and affordable housing
Housing	27	Policy H01: Provision of Housing	We are pleased to see that the Dunsfold Neighbourhood plans to meet the minimum identified housing requirement in full.

<p>Housing Allocations – Methodology</p>	<p>Chapter 5</p>	<p>General housing allocations</p>	<p>As previously discussed, all potential sites should be assessed against the following three criteria (suitability, availability, achievability). You should ensure that you have evidence to demonstrate each of these criteria, as otherwise a proposed allocation is likely to be challenged at Examination.</p> <p>We note that Aecom were appointed process to provide an independent assessment of the potential housing sites, and that the process assessed the sites using the Government's Planning Practice Guidance (PPG). Following this a second stage of assessment was conducted by the Steering Group to take into account Dunsfold's specific factor; this also took into account public consultation feedback.</p> <p>We are concerned that the site selection process minimises the weight of the assessment conducted by Aecom. Having commissioned this work by Aecom, if the selection in the DNP gives limited weight to the assessment made by Aecom, we would expect this may be challenged at examination.</p> <p>As you will be aware, when assessing the suitability of a site against national and local planning policy, additional local criteria can also be used providing it does not discriminate against one or more particular site and that the same criteria and scoring method is used for each site. We continue to be concerned about some of the 'Stage 2' assessment criteria. For example, the 'Scale' criteria, where is the justification or evidence for this assessment criteria? A site of 11 dwellings in a suitable location could be more 'in keeping with character and setting' than a site of 9 dwellings in an unsuitable location. We would be concerned that this criterion, amongst others, could be challenged at Examination.</p> <p>We are also concerned that in some instances the RAG scoring appears to be incorrect or inconsistent. For example, the 'Land Use' scoring details that 100% previously developed sites will be scored 'Green', mixed brownfield and greenfield land will be scored 'Amber' and 100% greenfield sites will be</p>
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			<p>scored 'Red'. Taking this into account, DNP3 (Wetwood Farm Poultry) is described as "a mixture of greenfield and redundant agricultural land" this means the site is 100% greenfield. Accordingly, using the agreed scoring definitions it should be rated 'Red' however the Site Assessment Report states a 'Green' rating. We would suggest that all the site assessments are checked for any discrepancies.</p> <p>Whilst we understand the decision to consult and collaborate with the Dunsfold community on sites proposed for allocation within the Dunsfold Neighbourhood Plan, it has to be recognised that proposed allocations must have planning justification not just local support. Given our comments, we would welcome the opportunity to discuss the site assessment criteria and the proposed allocations with you in further detail.</p>
Housing Allocations	-	General housing allocations	There are a number of site-specific requirements set out in the supporting text, if these are considered necessary to make the development acceptable at the proposed allocations then these should be included within the specific allocation policies themselves (e.g. within HA1).
Housing Allocation HA1: Alehouse	29	Housing Allocation HA1: Alehouse	<p>This site is within the Countryside beyond the Green Belt and the AGLV; it adjoins the existing settlement and allows for access the key service and facilities within the village. It is also located within the Conservation Area and is in close proximity to listed buildings.</p> <p>We are concerned that the policy lacks detail and does not currently recognise key constraints of the site e.g. potential impact on heritage assets. This site is located within the Conservation Area and is considered to contribute to its significance through adding to the sense of openness, space, rural tranquillity and connection to the villages agricultural past, which has been diluted though the building of several houses to the rear of the ribbon development.</p>

			<p>The listed buildings' significance lies predominantly in the evidential value of their historic fabric but also with their illustrative value with regard to the social history of the locality and their aesthetic valued as visually attractive buildings. There does not appear to be any direct link between the field and the adjacent listed buildings in terms of function or ownership but it does form part of the their setting as it is the dominant element in outward views from the rear and form part their rural setting.</p> <p>We would recommend undertaking an assessment of the heritage assets impacted to ascertain their significance and pick up any issues that should be put into a policy/design code. Please see guidance from Historic England on site allocations: https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/</p> <p>We suggest that evidence should be provided as to why the site is specifically allocated for retirement dwellings and the number which it has been allocated for – is this viable? We also suggest that the Policy itself should be clear that the allocation is for C3 dwellings.</p> <p>We would also query whether the reference to a lower density of housing being necessary, in paragraph 5.24, give doubt to the achievability of 4 dwellings on this site.</p>
Housing Allocation HA2: Coombebury	30	Housing Allocation HA2: Coombebury	<p>We consider this site is a suitable proposed allocation. Although within the Countryside beyond the Green Belt and the AGLV, this site adjoins the existing settlement and allows for access the key service and facilities within the village.</p> <p>We would query whether the proposed allocation of 12 dwelling is consistent with paragraph 125 of the NPPF, in particular in relation to the 'efficient use of land'. It may be that the Neighbourhood Plan wishes to express the allocation as an 'at least' figure.</p>

Housing Allocation HA3: Wetwood Farm	30	Housing Allocation HA3: Wetwood Farm	<p>This site is located within the Countryside beyond the Green Belt and the AGLV; it is also located some distances from the existing settlement areas.</p> <p>It is noted that as per the supporting text, the allocation of 7 dwellings at this site is in addition to the 5 units already permitted.</p> <p>We are concerned that the allocation of this site conflicts with other principles/policies within the Neighbourhood Plan – for example paragraph 5.18 states that the allocated sites “seek to maximise the use of previously developed land and land not used for agriculture within or well related to Dunsfold Village.”. This site is not PDL, and it is arguable that this site is not well related to the existing settlement.</p> <p>If the site is greenfield/agricultural, in policy terms, it will be difficult to justify new housing on the site. It is not clear whether the additional seven units will be achieved via further conversion of buildings or will result from the construction of new buildings. It may be possible that further conversion on the site is suitable. We would suggest further consideration on the suitability of this site is undertaken. We would refer you to consider paragraph 79 NPPF.</p>
Housing Allocation HA4: The Orchard	31	Housing Allocation HA4: The Orchard	<p>We understand that part of the site is currently in employment use and is therefore potentially PDL. As detailed by Aecom, the site may be suitable for conversion. Any loss of employment would need to comply with Policy EE2: Protecting Existing Employment Sites in LPP1.</p> <p>We note that there has been a granted planning permission on this site (WA/2022/00606) for the erection of 2 dwellings with detached garages, following demolition of existing commercial storage building.</p>

Housing Allocation HA5: Springfield	31	Housing Allocation HA5: Springfield	<p>We consider this site is a suitable proposed allocation. Although within the Countryside beyond the Green Belt and the AGLV. The site does not directly adjoin the existing defined settlement but allows for access to the key service and facilities within the village.</p> <p>We would query whether the proposed allocation of 10 dwelling is consistent with paragraph 125 of the NPPF, in particular in relation to the 'efficient use of land'. It may be that the Neighbourhood Plan wishes to express the allocation as an 'at least' figure.</p>
Conflict with other neighbourhood plan policies	32	Policy H02: Self-Build Houses	<p>Is it the intention that these will be supported outside of the settlement boundary or only within the settlement boundary. If it is the former, then there is conflict with Policies P02: Spatial Development of Dunsfold and H03: Windfall Sites.</p> <p>We would also note that national policy and guidance does not distinguish between self/custom build and therefore we do not consider the detail within paragraph 5.29 is appropriate.</p>
Windfalls - Conflict with other neighbourhood plan policies	32	Policy H03: Windfall Sites & Para 5.30	<p>This appears to conflict with Policy P02: Spatial Development of Dunsfold as they set out different requirements for development outside of the village/settlement area.</p> <p>The approach of this policy appears to be inconsistent with national policy (NPPF) in a number of ways. The first part of the Policy suggested that the redevelopment of brownfield sites should only be acceptable within the settlement boundary – this approach is beyond that of even Green Belt policy.</p> <p>The second paragraph of the Policy implies that any proposed dwelling outside the settlement boundary should be considered an isolated home. This is contrary to the argument being presented elsewhere within the Dunsfold Neighbourhood Plan.</p>

			<p>Additionally, some of the plan's site allocations are in conflict with this policy – for example HA2: Coombebury which is outside of the settlement boundary/area.</p> <p>The definition of windfall sites given in the NPPF is: 'Sites not specifically identified in the development plan'. The specific requirement in Policy H03 and para 5.30 for sites to be previously developed and within the settlement boundary to be considered as windfall sites is therefore not consistent with national policy.</p>
Windfalls	33	5.31	<p>The paragraph appears to set additional expectations for windfall sites. We would expect that any requirement would be contained within policies, rather than supporting text. It is not clear how the windfall proposals would be able to demonstrate general conformity with the Site Selection Principles.</p>
Housing Mix	33	Policy H04: Mix of Housing Size	<p>It is not clear whether Dunsfold Neighbourhood Plan is proposing a different approach to housing mix to that proposed in LPP1 Policy AHN3. We would welcome clarity on this matter.</p> <p>We understand the reasoning for including reference to the need for home working space within the second part of the policy; however, we query what the requirement is and how this will be applied in practice. For example, some may view a dining room table as an adequate home working space whereas another may view that an independent office is required. We also query the impact of this part of the Policy on viability.</p>
Housing Mix	33	Para 5.32/Table 4.1	<p>LPP1 Policy AHN1 requires the mix of dwelling types, sizes and tenure split to reflect the type of housing identified in the most up to date evidence of housing need.</p> <p>The latest needs evidence for affordable housing is the Waverley Housing Affordability Study 2021 which</p>

			<div>differentiates the recommended bed size mix for rented and affordable home ownership homes:</div> <table><tr><td></td><td>1 bed</td><td>2 bed</td><td>3 bed</td><td>4+ bed</td><td>Total</td></tr><tr><td>Affordable home ownership (First Homes, shared ownership and shared equity) mix</td><td>20%</td><td>50%</td><td>25%</td><td>5%</td><td>100%</td></tr><tr><td>Affordable housing (for social and affordable rent) mix</td><td>40%</td><td>30%</td><td>25%</td><td>5%</td><td>100%</td></tr><tr><td>Overall affordable housing mix</td><td>30%</td><td>40%</td><td>25%</td><td>5%</td><td>100%</td></tr></table> <div>It is not clear whether Dunsfold Neighbourhood Plan is proposing a different approach to affordable housing mix to that proposed in LPP1 Policy AHN3. We would welcome clarity on this matter.</div>		1 bed	2 bed	3 bed	4+ bed	Total	Affordable home ownership (First Homes, shared ownership and shared equity) mix	20%	50%	25%	5%	100%	Affordable housing (for social and affordable rent) mix	40%	30%	25%	5%	100%	Overall affordable housing mix	30%	40%	25%	5%	100%
	1 bed	2 bed	3 bed	4+ bed	Total																						
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Affordable housing (for social and affordable rent) mix	40%	30%	25%	5%	100%																						
Overall affordable housing mix	30%	40%	25%	5%	100%																						
Housing Mix	33	Para 5.34	See above for affordable housing mix as per Affordability Study 2021 rather than 2015 SHMA																								
Clarity	33	Para 5.37	<div>Suggest amendment:</div> <div>“Of the 68 units already approved, 28 are affordable. At 42% this is significantly higher than the minimum 30% required by WBC in LPP1 Policy AHN1.”</div>																								
6. Natural Environment																											
Habitats and Biodiversity	36	Policy NE01: Habitats and Biodiversity	The first part paragraph of the policy as currently worded is not consistent with paragraph 180a) of the NPPF. Para 180a)																								

			<p>sets out that where significant harm to biodiversity cannot be avoided, mitigated or compensated for, then planning permission <i>should be refused</i>.</p> <p>Is it the intention of this policy to bring in the requirement in the Environment Act for biodiversity net gain early, or at a different level than the Environment Act? The policy does not specify the level of biodiversity net gain being required or how this will be assessed. What is the evidence for introducing a different requirement to the Environment Act?</p>
Trees, Woodland, Hedgerows and Landscaping	37	Policy NE02: Trees, Woodland, Hedgerows and Landscaping	<p>We query the justification for this Policy, as it appears to go beyond NPPF, LPP1 and LPP2 policies on trees, woodland, hedgerows and landscaping. Perhaps it would be useful to amend to: “Where appropriate, development of any site within Dunsfold should respect the rural nature of the village and:...”</p> <p>We would also query what justification or evidence is provided to support that garden space should be in excess of the minimum sizes being proposed within the emerging LPP2.</p> <p>It is unclear to what type of development proposals the final paragraph applies to. We also suggest final paragraph is amended: “...possible appropriate, should comprise native species” to reflect that native species may not always be the most appropriate solution.</p>
Flood Risk, Sustainable Drainage Systems and Water Management	38	Policy NE03: Flood Risk, Sustainable Drainage Systems and Water Management	<p>Is it the intention that the second part of the policies applies to all development proposals (i.e. including householder applications for extensions etc.), or should this refer specifically to development proposals for new dwellings?</p>
Light Pollution and Dark Skies	38	Policy NE04: Light Pollution and Dark Skies	<p>The wording of the policy should clarify whether it refers to just outdoor lighting or indoor lighting as well. It is also not clear how Officers would be expected to assess and apply this Policy.</p>

			As above, is it the intention that this applies to all development proposals (i.e. including householder applications for extensions etc.), or should this refer specifically to development proposals for new dwellings?
Noise Pollution	39	Policy NE05: Noise Pollution	<p>We query the requirement of this Policy, specifically as to what is defined as an 'adverse noise impact'.</p> <p>We consider that in regards to construction hours, it is more appropriate for this to be considered when assessing a planning application, and if appropriate apply a condition on a case-by-case basis.</p>
Noise Pollution	39	6.19	The paragraph appears to set out that certain types of development will be supported (noise reducing measures), we suggest that this support would be better set out within policy rather than in supporting text.
7. Environment, Sustainability and Design			
Dunsfold Village Design Statement	41	ES01: Character and Design	The status of the Dunsfold Village Design Statement is adopted guidance, therefore the appropriate requirement in the policy would be for development to "have regard" to the design statement.
Dunsfold Village Design Statement	42	ES02: Landscape and Visual Impact	The status of the Dunsfold Village Design Statement is adopted guidance, therefore the appropriate requirement in the policy would be for development to "have regard" to the design statement.
Dunsfold Village Design Statement & Permitted Development	42	ES03: Design Standards	<p>The status of the Dunsfold Village Design Statement is adopted guidance, therefore the appropriate requirement in the policy would be for development to "have regard" to the design statement.</p> <p>We would welcome early discussions with the Parish Council regarding a review of the Village Design Statement as this is adopted as Supplementary Planning Guidance (SPG) and we will need to plan this into our workstreams.</p>

			<p>With regards to part (j), we note that many of these are permitted development and therefore the neighbourhood plan policy would not be applied to these development types.</p> <p>Typo in point (k) – missing ‘be’ after ‘should’.</p>
Space Standards	43	ES04: Space Standards	<p>This repeats Policy DM5 within the emerging LPP2. We, therefore, recommend its removal.</p> <p>Additionally, the National Space Standards can only be introduced by a Local Plan, as stated in the March 2015 Ministerial Statement. In view of this, the Council do not consider that adherence to the National Space Standards can be a requirement of a neighbourhood plan policy. – the emerging Local Plan Part 2 requires the NDSS to be met and this has been tested through a viability assessment.</p>
Public Realm	44	ES05: Public Realm	<p>This repeats aspects of Policy DM6 within the emerging LPP2, we would query whether the Policy provides any further level of detail specific to Dunsfold.</p> <p>Suggest that (c) is amended to say “Native species should be utilized where possible appropriate” to reflect that native species may not always be the most appropriate solution.</p>
Creation of Safe Public and Private Spaces	44	ES06: Creation of Safe Public and Private Spaces	<p>This largely repeats DM7 within the emerging LPP2. We would therefore recommend its removal.</p> <p>We note that this policy omits part (d) of emerging Policy DM7 which covers appropriate lighting – this is necessary for safer places.</p>
Heritage	45	ES07: Heritage Assets	<p>This policy is very generic and there are already strong national and local policies on heritage, in addition to special statutory duties to consider impacts on listed buildings and conservation areas. We suggest that instead of repeating these, it would be advisable for the policy to focus on locally</p>

			<p>specific issues and highlighting and protecting specific local characteristics, such as boundary treatments.</p> <p>Buildings of Local Merit are, under the NPPF, considered to be non-designated heritage assets however they can also be identified during the course of a planning application. Consider changing the wording to <i>'Development affecting designated heritage assets including Statutory Listed Buildings and Conservation Areas, and non-designated heritage assets including Buildings of Local Merit and Heritage Features should...'</i> to provide greater clarity.</p> <p>Both Conservation Area's within the Neighbourhood Plan Area have up to date Conservation Area Appraisals, yet only the Dunsfold Conservation Area Appraisal is mentioned. The conservation area appraisals are a good starting point for identifying specific characteristics.</p>
Design	45	ES08: Sustainable Design	<p>We suggest revision of the final paragraph to take account of the following:</p> <ol style="list-style-type: none"> 1. Whilst the Historic England advice is a fantastic resource, it is only one of many documents/sources which historic building owners should be referring to for advice. 2. The Building Regulations (part L) state that listed buildings and buildings within a conservation area do not need to fully comply with the energy efficiency requirements where to do so would unacceptably alter the building's character and appearance. Also, that historic and traditional buildings (regardless of whether they are listed or in a conservation area) should only be improved if doing so will not cause long-term deterioration of the building's fabric or fittings. <p>This is important because if retrofit is carried out without due care and attention to the special interest, appearance and/or construction of a building of traditional construction, it can</p>

			cause irretrievable harm and will often be incompatible with the original construction causing damp etc.
ASVI	46	ES09: Areas of Strategic Visual Importance	<p>The policy seeks to designate the areas stated as ASVIs but does not set out the policy which would apply to these areas – is it the intention that the Local Plan Part 1 policy on ASVIs (Policy RE3) would apply to these areas? If so, the designated areas are not well suited to Policy RE3, which is designed to relate to designated areas of land rather than views from a footpath. Policy RE3 would only apply to the designated areas i.e. the footpaths, rather than the views from the designated areas.</p> <p>Additionally, LPP1 and Policy RE3 do not identify a need to designate ASVIs within Dunsfold. It may be that the Dunsfold Neighbourhood Plan wishes to considered using a local designation which is focussed on views, rather than ASVIs. The Godalming and Farncombe Neighbourhood Plan and Bramley Neighbourhood Plan have used this approach.</p>
8. Employment and Business Support			
Employment	48	Policy EB01: Local Employment Space	Suggest reconsidering the wording of the second part of the policy – this could either say “new business development will not be supported if they” or flip this to be worded positively e.g. “new business developments will be supported where they: (a) do not involve heavy use of HGVs; (b) do not pollute the air or water;...”. The use of the word ‘discourage’ also does not provide any certainty about how proposals will be considered.
Equestrian Related Development	49	Policy EB02: Equestrian Related Development	Where the policy relates to equestrian enterprises, it should be consistent with paragraph 84 a) of the NPPF which sets out: “Planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings”.

Communications	50	Policy EB03: Communications	We would query whether this policy set out support for proposals which would improve digital communications or whether it is a 'wish list' item. Policies can only be applied where planning applications come forward. If it is the latter then this could be moved to a separate section which sets out non-land use issues – see example in Godalming and Farncombe Neighbourhood Plan (Chapter 10).
Advertisements	50	Policy EB04: Advertisements	<p>We would refer to our earlier informal comments made on this Policy. For clarity, we would suggest the following amendment: “The Parish of Dunsfold is <i>within</i> an Area of Special Control of Advertisements...”</p> <p>We would also we would urge consideration of the NPPG in relation to advertisements, which states (emphasis applied by the Council):</p> <p><i>“What additional considerations may apply when considering applications for sign posting in rural areas?</i></p> <p><i>In dealing with applications for ‘advance signs’, to be sited off highway land, directing potential customers to businesses or tourist attractions in scenically attractive rural areas, local planning authorities need to bear in mind that appropriate sign-posting can benefit the local economy and reflect this through the decision-making process.</i></p> <p><i>If consent for such signs has to be refused on amenity or public safety grounds, efforts should be made, where practicable, to suggest an alternative site or sign and to co-operate with the applicant in devising a sign posting scheme which is acceptable in the locality.”</i></p> <p>In taking this into account, it may be worthwhile reconsidering aspects of this Policy, to allow for appropriate signposting that may not qualify as being “essential for highway safety”. We suggest also reviewing the Waverley Shopfront Guidance to</p>

			<p>assess whether anything additional from a heritage perspective should be included in the policy.</p> <p>The policy refers to the Conservation Area, however there are two Conservation Areas within the neighbourhood plan area, both of which are within the Area of Special control of Advertisements</p>
9. Transport and Getting Around			
Highways and Traffic Calming	52	Policy TG01: Highways and Traffic Calming	<p>Measures to manage the speed of traffic and reduce speeds are unlikely to constitute development and/or require planning permission – these aspects of the Policy could be moved to a separate section which sets aspirations regarding out non-land use issues.</p> <p>The final section of the Policy appears very similar to that proposed within TG02.</p>
Sustainable Transport	53	Policy TG02: Sustainable Transport	No comments.
Parking	53	Policy TG03: Car Parking Standards	<p>This policy as drafted does not provided an indication of what is determined to be 'appropriate' provision and would be difficult to apply. LPP1 includes a strategic policy on car parking standards. To strengthen this Policy we would suggest referring to existing car parking standards. We would suggest useful starting point may to look at the Chiddingfold Neighbourhood Plan whereby there is a policy on this matter.</p> <p>We also note that Building Regulations Part S bring into force new requirements regarding electric vehicle charging.</p>
Bus Services	54	Policy TG04: Improved Bus Services	Unless required in connection with a development proposal, the provision of a bus service is not a land use matter - this could be moved to a separate section which sets out aspirations regarding non-land use issues
10. Recreation, Leisure and Wellbeing			

Community and Leisure Facilities	56	Policy RL01: Community and Leisure Facilities	The intention of this Policy is support. However, we would suggest that this Policy should be checked for consistency against LPP1 Policy LRC1 as they appear to cover very similar aspects.
Assets of Community Value	57	Policy RL02: Retention of Assets of Community Value	<p>We would suggest that this Policy should be checked for consistency with the NPPF, NPPG guidance and Assets of Community Value legislation.</p> <p>The latter part of the Policy appears aspirational and is not clear how it would be applied when determining planning applications, and we would suggest moving it to the supporting text.</p>
11. Infrastructure and Delivery			
Infrastructure Delivery	59	Policy ID01: Infrastructure Delivery	We would emphasise that this Policy should be checked for consistency with the Local Plan, NPPF and relevant NPPG guidance.
Dunsfold Surgery	60	Policy ID02: Dunsfold Surgery	<p>We would query whether these policies are set out support for proposals which would improve facilities or are they 'wish list' items. Policies can only be applied where planning applications come forward and is not clear how it would be applied when determining planning applications. If the intention is the latter, then this could be moved to a separate section which sets out non-land use issues.</p>
Mobile Phone Masts	60	Policy ID03: Mobile Phone Masts	
Broadband	60	Policy ID04: Broadband	
Power Supply	60	Policy ID05: Power Supply	
Wastewater Capacity	61	Policy ID06: Wastewater Capacity	If you have not already done so, we would recommend that you discuss and gain a view from relevant statutory bodies on this Policy.
Renewable Energy	61	Policy ID07: Renewable Energy	<p>We would query the justification and reasoning for proposal only being supported at a domestic scale and whereby "intended primarily to meet the electricity demands of the applicant's property", the Policy may be considered overly restrictive.</p> <p>This Policy also appears to be at odds with the text contained within paragraph 11.12 which suggests that "Proposals for</p>

			renewable energy generation will be supported within Dunsfold". Whereas currently, ID07 only supports very specific types of proposals.
Factual Correction	61	11.13	It is factually incorrect to state that infrastructure is only funded by two sources (CIL & Section 106), we would suggest this reference is removed.
Factual Correct	61	11.13	We would suggest the definition is amended to the following, as per the Developer Obligation NPPG: "Section 106 Legal Agreements ensure that financial and other contributions are obtained to mitigate the site specific impacts resulting from any development assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. "
CIL	61	11.14	For factual correctness we would advise the following change: "The CIL for Waverley Borough came into effect on 1 March 2019 and is chargeable as per the uses included within the adopted Charging Schedule required for all residential dwellings and new retail floor space. "
CIL	62	11.15	It is unclear what is meant by this paragraph. Dunsfold Parish Council have the responsibility to decide how Neighbourhood CIL is spent, in accordance with the CIL Regulations. However, Dunsfold Parish Council cannot determine how strategic CIL funds are spent.
Factual Correction	62	11.17	It is factually incorrect to suggest that all new development will be required to pay CIL.
S106	62	11.18	It is not appropriate to state that WBC will consult with Dunsfold Parish Council when negotiating a S106 agreement (or other agreements) for major development. The legal requirement for a S106 agreement is only necessary to make a development proposal acceptable in planning terms that would not otherwise be acceptable. Local planning authorities have a duty to consider whether otherwise unacceptable

			development could be made acceptable through the use of conditions or planning obligations. As a S106 is a legal agreement between the LPA and the applicant/developer it would not be appropriate to have the involvement of other third parties. However, the Parish Council does have the opportunity to input into the types of infrastructure required through consultation on the Waverley Infrastructure Delivery Plan (IDP).
Infrastructure Delivery Plan (IDP)	62	11.19	<p>We are supportive of Dunsfold Parish Council preparing an IDP to support the allocation/expenditure of Neighbourhood CIL funds. This will improve accountability of expenditure at a later date.</p> <p>It does appear that an attempt to list priority of CIL spending has been made within paragraph 11.4 but it is not clear how this would interlink with the production of a future IDP document.</p> <p>However, it should be noted that Strategic CIL funds are allocated and spent by the Borough Council in accordance with the agreed governance process.</p>
Glossary			
Please review to ensure that all definitions are consistent with the NPPF and/or Planning Practice Guidance. In particular, we have noted that the definitions for custom-build and self build housing (the NPPF and national legislation does not distinguish between the two) and windfall development are different to the NPPF definitions.			

Email: xxxxx@surreycc.gov.uk



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

Environment, Transport,
and Infrastructure
Spatial Planning Team
Surrey County Council
Quadrant Court
Woking
GU22 7QQ

Sent by email to: xxxx@btconnect.com

28 September 2022

Dear Sir or Madam

Surrey County Council Response to the 2022 Dunsfold Neighbourhood Plan 2013-2032 Regulation 14 Draft

Thank you for consulting Surrey County Council on the draft Dunsfold Neighbourhood Plan. Our comments are set out below and relate to Flood Risk, Heritage, Countryside Access and Transport.

Flood Risk, Sustainable Drainage Systems and Water Management

The first part of policy NEO3 on the criteria for submitting a Flood Risk Assessment is a repeat of National Planning Policy Framework (NPPF) footnote 55. Reference could be made back to the NPPF i.e. a Flood Risk Assessment is required as defined in footnote 55 of the NPPF.

We would suggest the following wording changes for the second part of policy NEO3:

Surface water should be managed and discharged in accordance with the Drainage Hierarchy (the hierarchy could be listed here if more detail is required)

All development proposals must **include** ~~demonstrate that they include one or more of the following sustainable drainage design features to manage the risk of surface water run off over land~~ **unless there is clear evidence that this would be inappropriate. Such measures could include but are not limited to:**

- permeable driveways and parking areas;
- rainwater harvesting and storage features;
- green roofs;
- soakaways; or
- attenuation ponds, **swales, raingardens.**

Where possible sustainable drainage systems should provide multifunctional benefits.

We would suggest the following wording changes for paragraph 6.14:

6.14 Proposed developments must not be at risk of flooding **from all sources** or increase the flood risk elsewhere.

The second sentence of paragraph 6.14 is a repeat of our policy suggestion above and hence we would suggest it is deleted.

Heritage

We are pleased to see the inclusion of policy ESO9 covering areas of strategic visual importance.

Policy ES07 on heritage assets appears largely to cover only designated features. We would suggest that the wording is changed to make it clear that non-designated heritage assets – for example locally listed buildings or Areas of High Archaeological Potential – are also considerations within the planning process and need to be accorded the appropriate weight when applications are considered. Applicants are advised to consult the Historic Environment Record at Surrey County Council for more information about undesignated heritage assets.

Any sites allocated for development that are over 0.4ha in size will require archaeological assessment in line with the Waverley Local Plan policies.

Countryside Access

We note in policy TGO1 that proposals that enhance existing and provide new footpaths and bridleways will be supported. The Surrey County Council Countryside Access team would be happy to consider any specific schemes within the relevant legislation and work with the Parish to explore the viability and value of any improvements.

Transport

Surrey County Council do not have any specific comments regarding the proposed sites. However, it should be noted that the sites allocated for development will need further assessment at the planning application stage in the form of a transport statement/assessment and travel statement/plan, demonstrating that the highways and transport implications of the development accord with both National and Local Plan policy.

I hope these comments are helpful. If you require further information, please contact Nikki Nicholson at nikki.nicholson@surreycc.gov.uk.

Yours sincerely,

xxxxxx
Principal Planning
Officer Surrey County
Council

Date: 04/10/2022

Our reference: Reg14DunsfoldNP_CB_MW

By email: xxxx@btconnect.com

Dear Dunsfold Parish Council,

Re: Dunsfold Neighbourhood Plan 2013-2032 Regulation 14 Draft July 2022

Thank you for this opportunity to comment on the above planning application. This representation is provided in view of Surrey Wildlife Trust's position on the ecological issues involved, climate change and our over-arching mission to recover nature/biodiversity.

Surrey Wildlife Trust is the only local organisation dedicated to ensuring Surrey is a place where both abundant wildlife and people can live and thrive together. Guided by a collaborative vision where we all play a part in connecting nature, we provide expert advice and guidance to land owners and managers, making sure the land we look after leads by example, while inspiring and educating people and organisations across the county on what they can do. By doing this we will create a Surrey that is full of diverse and abundant wildlife, where nature is at the heart of individual choices, corporate decisions, and local economic and policy making. One that helps tackle the ongoing climate emergency, while supporting the health and wellbeing of all who live here.

As a local charity founded 60 years ago on the passion and drive of volunteers, we channel this energy today, alongside our technical expertise, to bring together the diverse skills needed across the county. As we are one of 46 wildlife trusts that form The Wildlife Trusts, we have both a local and national perspective on the issues affecting wildlife and people.

On the basis of the available information, we have a number of recommendations to make. Our position is summarised below.

Protected Species

Dunsfold is a sensitive ecological location for Barbastelle and Bechstein Bat, European Protected Species (Annex II) under the Conservation of Habitats and Species Regulations 2017, which are notably rare and particularly sensitive to light. They are known to forage/breed within Chiddingfold SSSI, which is located within the designated Neighbourhood Plan Area (NPA). A number of protected species licences have been issued by Natural England within the wider NPA and certainly in and around the village core; including not just for Bats (and specifically Barbastelle; confirming this species uses area where new housing development is proposed); but also Great Crested Newt.

Therefore, we strongly advise that any development proposals within the NPA needs to consider not just the direct lighting impacts of development, but also impacts to habitat connectivity caused by lighting. Furthermore, guidance provided by Bat Conservation Trust sets out that the core sustenance zone for Barbastelle is 6km and Bechstein is at least 3km and highlights ways to boost connectivity is through streams; corridors; and hedgerows used

for commuting (for Bechsteins) and commuting along riparian corridors and treelines (Barbastelles). This highlights just how important it is for the area to remain dark, particularly given that the wider area beyond the red line boundary of the NPA is designated an international dark sky zone.

The *Dunsfold Neighbourhood Plan 2013-2032 Regulation 14 Draft July 2022* document policy NE01 makes reference to “no loss of bat commuting or foraging routes or fragmentation either due to direct land take or disturbance from lighting” and draft policy NE04 relates to light pollution and dark skies. We advise the policies should go further and no lighting across key bat foraging habitat should be allowed. Further, we advise that every development, including windfall sites, within the Dunsfold Neighbourhood Plan should be required to provide a sensitive lighting plan to ensure key foraging/commuting habitat remains unlit.

We further suggest amended wording to policy NE01 as follows:

“b) no loss of bat commuting or foraging routes or fragmentation either due to direct land take or disturbance from lighting, noise and vibrations. Furthermore, if a site survey by a suitably qualified ecologist indicates that habitats on or adjacent to any development site constitute key ~~features~~ **habitat** for bats, appropriate design ~~and mitigation~~ should be put in place **to ensure that key habitat is not directly or indirectly adversely impacted by the development proposals.**” Note, The Trust believes that avoidance of negative impacts to key habitat is the only appropriate outcome in such scenarios. However, if the policy moves forward in its current format, we would advise that wording be amended to reflect the mitigation hierarchy. **“If negative impacts to key habitat cannot be avoided, this should be mitigated.** Design avoidance and mitigation could include, but not **be** limited to, retaining and limiting light spill onto key features within or outside of the boundaries of the development site”. We also note there is no reference in the policy relating to roosting habitat for Bats, i.e. trees. If any trees are to be lost, they would first need to be surveyed by a suitably qualified ecologist to determine their roost suitability and felling only proceed in accordance with their advice.

Protected Habitat

The NPA include Chiddingfold SSSI and local sites of nature conservation importance (SNCI). As referenced above, the draft neighbourhood plan includes a number of natural environment policies. Within policy NE01, it is stated that “Any development proposal that results in significant harm to designated environmental assets, especially the Chiddingfold Forest SSSI, the Wealden Heaths Phase II SPA, the Ebernoe Common SAC and all areas of Ancient Woodland that cannot be avoided, adequately mitigated or, as a last resort, compensated for, will only be supported in exceptional circumstances.” The Trust opposes any development proposal that has a detrimental impact on any protected habitat. We would advise the wording of this policy to closely align with the policy wording of para 180 of the National Planning Policy Framework (NPPF) i.e. development likely to have an adverse impact on a SSSI should be refused with only one exception that the benefits of the development in the location proposed clearly outweigh its likely impact on the features of the site that make it of special scientific interest.

We would also advise the inclusion of Lowland Mixed Deciduous Woodland Habitat of Principal Importance, not just Ancient Woodland, in the policy, which is protected under section 41 of the Natural Environment and Rural Communities Act, 2006.

The draft Dunsfold Neighbourhood Plan does not appear to make reference to any SNCI. SNCIs are selected as they contain features that are of high conservation value at the local level and indeed may have as much, if not more, value as SSSIs, which were selected and designated to be a representative example of habitats of value. Dunsfold Green and Dunsfold Common SNCI is located within the red line boundary of the NPA. This SNCI is some 28.9 ha in size and the whole area contains nationally rare flora and fauna and is selected for the presence of these species.

Further biodiversity considerations

Biodiversity Opportunity Areas (BOA) represent those areas where improved habitat management, as well as efforts to restore and re-create Priority habitats will be most effective in enhancing connectivity to benefit recovery of Priority species in a fragmented landscape.

The SEA produced to inform the draft document rightly states that if the proposed allocation sites are cleared, this will lead to fragmentation of the landscape. We advise that the Dunsfold Neighbourhood Plan makes reference to the importance of BOAs for the area. More information can be found at [WORKING GROUPS \(surreynaturepartnership.org.uk\)](http://surreynaturepartnership.org.uk). Specifically, the objectives and targets of the most relevant BOAs LW01 (Appendix 8) and WG05 (Appendix 7) should be referenced within the document. This should ensure important habitat for a number of key species are not just maintained, but also restored.

ES3 of chapter 7 makes reference to the creation of green corridors. Cross-referencing to above mentioned BOAs may be considered useful and would help link a number of national and local sites.

We note from policy NE01 D) that reference is made to biodiversity net gains. A specific measurable figure has not been included within the policy. The Environment Act requires a 10% biodiversity net gain and reference should be made to this at para 6.10. The Trust supports Surrey Nature Partnership's recommendation for Local Planning Authorities to adopt a minimum 20% Biodiversity Net Gain policy, which is considered appropriate and necessary for Surrey¹.

Policy NE02 states that "development proposals should include details of the long-term management and maintenance of new and existing trees and landscaping, and where possible, should comprise native species." For Biodiversity Net Gain, the Environment Act states that long-term management is 30 years, so we would advise that long-term management in this context reflects this. The policy also states where possible, new landscaping should comprise native species. We recommend the policy wording be amended to "...native species or locally appropriate climate change-resilient species preferred".

We also support a bio-secure policy to prevent the introduction of harmful organisms to the local area to minimise the risk of transmission of disease to native plant species.

¹ [recommendation-for-20-bng-in-surrey_snp-november2020_final.pdf \(wordpress.com\)](https://www.surreynaturepartnership.org.uk/recommendation-for-20-bng-in-surrey_snp-november2020_final.pdf)

Within Chapter 7, draft policy ES03 relates to design standards. The policy in our view should be ambitious when it comes to considering biodiversity and reference could usefully be made to proposals including measures to support a number of species e.g. included integrated swift brick/bat boxes or other appropriate measures and incorporating green rooves.

We also recommend the Neighbourhood Plan resisting fossil fuels i.e. natural gas within the NPA, given its geospatial relevance.

We hope the above comments are helpful.

Kind regards,

xxxxx- Conservation Officer

Date: 28 September 2022
Our ref: 404171



Waverley Borough Council

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
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Cheshire
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T 0300 060 3900

Dear Sir/ Madam

Dunsfold Neighbourhood Plan – Reg 14 Consultation.

Thank you for your consultation on the above dated 10 August 2022

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft Neighbourhood Plan.

We have no comments to make on the site allocations, particularly as this Plan is not allocating development sites within 5km of designated sites and indeed all sites are outside of the 7km reach of the Wealden Heaths Phase I & II Special Protection Area (SPA).

We note that the draft Neighbourhood Plan identifies a further potential allocation of 35 dwellings with an initial target of 32 to secure. This is following the 68 which have already been completed or approved, seeking to meet the overall target of 100 new dwellings as per the Local Plan allocation. Natural England cannot fully rule out a potential risk to the environment, including Chiddingfold Forest SSSI and the Area of Great Landscape Value, but note consideration has been made to allocate sites outside of these designations.

I would like to take this opportunity to highlight that any proposed site allocations within, or in proximity of the Surrey Hills Area of Outstanding Natural Beauty (AONB) will need to consider impacts upon this designation. It may be useful to consult the AONB partnership on these proposals.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely,

xxxxx
Lead Adviser – Sustainable Development
Thames Solent Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>



Historic England

Dunsfold Parish Council

Our ref: PL00786762

dxxxx@btconnect.com by email only

3 October 2022

To whom it may concern:

Re: Dunsfold Neighbourhood Plan Regulation 14 consultation

Thank you for consulting Historic England on the Regulation 14 draft of the Dunsfold Neighbourhood Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

We welcome the production of this neighbourhood plan and are pleased to see that the historic environment of the neighbourhood plan area features throughout. In this letter I set out our primary general comments below and append a table of more detailed comments and suggestions.

Primary general comments

G1. We do not object to allocation policy HA1; however, the language in this policy needs to be tightened to make it clear what mitigation measures are required to make development at that location acceptable.

This concern has several aspects. First, we note that the site assessment report from 2018 (Appendix B) highlights the potential for heritage impact [from development at this site] and need for mitigation. Furthermore, we note that the SEA Environmental Report (Appendix G) records that site falls within the Dunsfold Conservation Area and is in proximity to several listed buildings, "but there is considered to be good potential to address constraints through layout, landscaping, and design." A similar point is made in Appendix C summarising Stage 2 of site selection, which states that "Design and layout must minimise any conflict between the heritage assets and any development." This sets the context for addressing mitigation more explicitly than is currently done in allocation HA1.



Historic England, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 0370 333 0607 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



In addition, the SEA process appears to consider archaeological remains only in terms of known assets. While the site is not within an area designated as an Area of High Archaeological Potential by Waverley Borough Council, that does not automatically mean that there is nothing there. We pick up this point and how to address it in general comment 3 below.

Thirdly, we note the relevance of policy ES09 on Areas of Strategic Visual Importance. While also noting that policy ES09 would benefit from greater clarity and an improved map (if possible), we believe that allocation HA1 needs to take account of ES09. This link needs to be made in the text supporting policy HA1.

G2. Our second general comment relates to policy ES07. We welcome inclusion of a policy on heritage assets and support the intention of this policy, but we feel that the policy wording should be amended to better reflect national policy (set out in the National Planning Policy Framework (NPPF)) to conserve heritage assets in a manner appropriate to their significance. The approach set out in ES07 appears to combine heritage assets, without modifying the approach to take account of different grades of asset. This is contrary to national policy.

We suggest the simplest approach to address this concern would be to remove reference to Buildings of Local Merit at the outset of policy ES07 and add suitable reference to the approach taken by the Plan to **non-designated heritage assets** at the end of policy ES07. We suggest specific wording in the Appendix below. The fact that non-designated heritage assets include 'Buildings of Local Merit' can be picked up in the supporting text.

Linked with this, we note that paragraph 2.7 refers to 'at least five Buildings of Local Interest' (as opposed to 'Buildings of Local Merit'). It is unclear which buildings are being referenced. Two points arise.

First a more general point - the language used to describe such assets needs to be consistent within the plan, so it is clear what is being considered. Reflecting what I believe to be the intention behind describing such assets as 'of local interest' (or indeed 'local merit') – namely, to inform planning decisions - the crucial point is that they have been identified by plan-making bodies as having a degree of heritage significance but do not meet the criteria for designated heritage assets (as explained in [Planning Practice Guidance](#)).

We recommend that the formal identification of such non-designated heritage assets is informed by testing against criteria set locally and a brief examination of each site's heritage interest to ensure they merit consideration in planning for their significance. It is unclear if the five Buildings of Local Interest mentioned in paragraph 2.7 have gone through this process or not.

For further advice on local heritage listing, you may wish to refer to our Advice Note available here: <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>

The second, more specific point, is that it would be helpful (for future decision-making and implementation of the plan) to identify the buildings of local interest in the plan or signpost to where that information can be obtained.

G3. We have a concern that the site allocations process, including related Strategic Environmental Assessment (SEA), considers known archaeology only. The proposed site allocations and policy ES07 do not consider potential impacts on unknown archaeological remains. We suggest liaison with the local archaeological adviser and Historic Environment Record (HER), if that has not been undertaken already. We reiterate the need for / merit of such liaison in comments on specific allocation policies in the appendix below too.

G4. Certain clarifications would support the Plan's implementation, including:

- a) Clarifying that early references to the settlement boundary are to the historically adopted settlement boundary rather than the preferred settlement boundary outlined in the Plan
- b) Clarifying the intention behind the planning principles and their relationship with policy P01. It may be that this can be addressed with minor changes to the terminology used – for example, changing 'Overall Vision: planning principles' to 'Planning objectives' and the seven subsequent entries being referenced as PO1, PO2 etc. As things stand, there is scope for confusion, with both a policy on core planning principles (P01) and a seemingly unrelated set of planning principles at the outset of the section.
- c) Adding the conservation areas to the key diagram and consider adding also the two areas of high archaeological potential (a decision on AHAPs would usefully be informed by further liaison with the local archaeological adviser). As stated in the NPPF paragraph 23, broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map.
- d) Clarifying as appropriate where that 'the environment' is intended to mean both the natural environment and the historic environment, and where it more specifically refers to the 'natural environment' or the 'historic environment'. For example, paragraph 2.5 refers to the land being environmentally sensitive; however, it does not mention the historic environment e.g. the two conservation areas and the two areas of high archaeological potential. Similarly, the map on page 4 of the Design Statement (Appendix J) refers to areas of environmental interest, without considering the historic environment.

Detailed Comments

Our detailed comments set out in Appendix A.

To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

I hope that these comments are helpful. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

xxxxx

Historic Environment Planning Adviser

Development Advice – London and the South East Region

xxxxx@historicengland.org.uk



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Appendix A

Comment number	Page	Para.	Comment	Any suggested revised wording
1	10		Given the proposed changes / corrections to the settlement boundary, it may help the reader to amend the key showing Dunsfold Village to state that this relates to depicting the settlement boundary from the 2002 Local Plan.	
2	12	2.5	As mentioned in general comment G4(d) above, this paragraph refers to the land being environmentally sensitive, but it does not refer to the historic environment. Generally, the plan does take account of the local historic environment, so this comment can be resolved with minor wording changes to this paragraph.	
3	13	2.7	Convention dictates that the grades of Listed Building are denoted Grade I and Grade II, rather than Grade 1 and Grade 2	In addition, the 13 th century church is Grade I listed and the pub, the war memorial and the former school are Grade <u>2</u> <u>II</u> listed.
4	13		To help the reader avoid confusion over the settlement boundary, we suggest that the Dunsfold village boundary be deleted from this figure, which is there principally to show the Conservation Areas in the village. Alternatively, the map key could make clear that this is the settlement boundary from the 2002 Local Plan.	
5	18		Overall vision: planning principles	As mentioned in G4(b) above, we recommend considering a change of terminology – perhaps to planning objectives, to avoid confusion with the core planning principles in policy P01
6	18		PP3: we recommend reference to heritage assets rather than historic assets to align with the NPPF	To require the design of developments maintains the essential character of Dunsfold and protects our <u>historic heritage</u> assets
7	19		We strongly recommend including the Parish's two Conservation Areas on the Key Diagram, and that consideration is also given to adding	

			the two Areas of High Archaeological Potential (to ensure those areas also informs consideration of development proposals in the Parish)	
8	20		P02: spatial development of Dunsfold: I would have expected this policy also to refer to the site allocations listed in the plan, as representing part of the spatial strategy for the Parish	
9	21	4.2	Minor clarification would help to ensure that a full, clear reference is given to the Local Plan	
10	25		H5: we suggest addition of the word 'historic' would bring additional clarity to the focus of objective H5	To ensure that the design and layout of housing reflects the <u>historic</u> character of the local built environment, maintains the rural nature of Dunsfold and protects the local landscape
11	26	H01	The final line of this policy could be taken to imply that the neighbourhood plan is not part of the neighbourhood plan. As made clear, including in the Planning and Compulsory Purchase Act 2004 section 38(3), neighbourhood plans are part of Development Plans.	Proposal for residential development will be supported on the sites listed above and defined on the housing allocations figures below, provided that the proposed development is in accordance with the policies contained within this Plan and <u>other elements of the Development Plan.</u>
12	29 / 30	HA1	<p>We outline our concerns in G1 above and propose alternative wording in the adjacent column.</p> <p>We suggest liaising with the local archaeological adviser and Historic Environment Record, if this has not been done already.</p> <p>Also, we suggest adding the need for applicants to refer to Policy ES09 on Areas of Strategic Visual Importance in the text supporting policy HA1.</p>	<p>The Alehouse site is allocated to deliver 4 retirement dwellings, to be occupied by those aged 55 and over.</p> <p>Development proposals will need to:</p> <p>a) be accompanied by evidence confirming that wastewater can either be disposed on on-site or that there is sufficient capacity within the wastewater network.</p> <p><u>b) demonstrate how the proposed development will preserve or enhance the conservation area.</u></p>

				<u>and avoid or minimise harm to the significance of the listed buildings nearby</u>
13	30 / 31	HA2	<p>We suggest liaising with the local archaeological adviser and Historic Environment Record, if this has not been done already.</p> <p>In addition, the southern edge of the site is near to (about 100m from) the Conservation Area. This proximity should be mentioned in the text supporting the policy, accompanied by a reference to policy ES07.</p>	
14	30 / 31	HA3, HA4	We suggest liaising with the local archaeological adviser and Historic Environment Record, if this has not been done already.	
15	32	HA5	<p>We suggest liaising with the local archaeological adviser and Historic Environment Record, if this has not been done already.</p> <p>In addition, the site is near to two listed buildings (as acknowledged in Appendix C) but also to the Conservation Area. These nearby designated heritage assets should be mentioned in the text supporting the policy, accompanied by a reference to policy ES07.</p>	
16	40		<p>Section 6 focuses on the Natural Environment, and section 7 is currently headed 'Environment, Sustainability and Design'. Reviewing the balance of content between these two sections may help to ensure that content is positioned appropriately e.g. should ES3 be in section 6?</p> <p>Depending on the outcomes of the above review, consider the merits of amending the title of section 7; for example, to <u>Historic Environment, Sustainability and Design</u>; and/or including in the introductory paragraphs of section 7 more explicit reference to what is meant by 'the environment' in section 7</p>	
17	41	ES 01	We suggest minor wording changes to policy ES01 to connect more with local character of the built heritage, including the Parish's Conservation Areas	New developments must respond to the specific built and landscape character of the site and its setting, <u>including but not limited to the local</u>

				<u>historic environment.</u>
18	42	ES 03	<p>We suggest combining criteria (b) and (c), noting that the historic character of the Village and the Parish's hamlets arise from principally its heritage assets and their settings.</p> <p>The cross-reference to policy ES 07 can gives room for policy ES 07 to ensure that impacts on heritage assets are given due consideration, and avoid un-necessary repetition.</p> <p>If this change is made, naturally it would impact on the number of the subsequent criteria in this policy.</p> <p>Also, we suggest signage and lighting are not automatically urbanising features, if designed sensitively. This concern could be addressed by moving the word 'inappropriate'</p>	<p>b) Protect and enhance the historic <u>Reflect the</u> character of Dunsfold's Village and hamlets, <u>acknowledging the contribution to that character made by the historic environment (and with reference to policy ES 07).</u></p> <p>c) Preserve or enhance heritage assets and their settings and any features of special architectural or historic interest they possess.</p> <p>l) Avoid the inappropriate use of urbanising features, such as <u>inappropriate</u> signage and lighting.</p>
19	44	ES 07 and para 7.13	<p>Policy ES07 and para 7.13 bundle designated and non-designated heritage assets together. To comply with national policy these different grades of asset should be considered separately. The approach to conserving and enhancing designated heritage assets is not the same as the approach for non-designated heritage assets (such as buildings of local merit/interest).</p> <p>There is no need to add 'Statutory' before 'Listed Buildings'</p> <p>It is good to refer to the Dunsfold Conservation Area Appraisal</p>	<p>Development affecting Statutory Listed Buildings, the Dunsfold Conservation Areas, <u>and</u> other designated heritage assets <u>in the Parish and Buildings of Local Merit</u> should preserve or enhance the significance of the assets, <u>including the contribution to that significance made by and their settings, and any features of special architectural or historic interest they possess.</u></p> <p>For proposed developments that could impact upon the significance of Statutory Listed Buildings, <u>including the curtilage of Listed Buildings, proposals will be required to demonstrate how this should be achieved by ensuring that any development or changes are compatible with and respect the special architectural or historic interest of the listed building and its setting.</u></p>

				<p>Development should preserve or enhance the character of the Conservation Areas in accordance with the Dunsfold Conservation Area appraisal.</p> <p><u>Proposals for development that will result in the loss of, or harm to a non-designated heritage asset will not be supported, unless it can be demonstrated that the benefits of the development outweigh the loss of significance of the asset and cannot otherwise be provided in a less harmful manner.</u></p>
20	45	ES 08	<p>We welcome reference to Historic England advice with regard to sustainable design.</p> <p>We suggest referring to historic buildings rather than Listed Buildings, to allow for such advice also to inform work to buildings which are not listed but which are still of historic importance.</p>	
21	46	ES 09 and Fig 7.1	<p>Greater clarity is needed when describing the Areas of Strategic Visual importance.</p>	

From: [xxx](#)
To: [xxxxx](#)
Subject: Fwd: [External] Dunsfold NP Regulation 14 Consultation Notification
Date: 05 September 2022 08:15:35
Attachments: [PastedGraphic-3.png](#)
[image001.png](#)
[DPC Reg14 Notification.pdf](#)

xxxx

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



Begin forwarded message:

From: The Coal Authority-Planning <xxxx>
Subject: FW: [External] Dunsfold NP Regulation 14 Consultation Notification
Date: 23 August 2022 at 18:36:02 BST
To: "xxxx@btconnect.com"
<dxxxxx@btconnect.com>

Dear xxxx

Thank you for your notification below regarding the Dunsfold Neighbourhood Plan Regulation 14 Consultation.

The Coal Authority is only a statutory consultee for coalfield Local Authorities. As you are aware, Waverley Borough Council lies outside the coalfield, therefore there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.

This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.

Kind regards

xxxxx