

Appendix K: Regulation 14 Draft Plan: Developer Submissions

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

26th September 2022

Dear Sir / Madam

**Dunsfold Neighbourhood Plan – Regulation 14 Consultation
Wetwood Farm, Chiddingfold Road, Dunsfold**

I act on behalf of the landowner and the Developer whom are supporting the proposed residential allocation at Wetwood Farm, Chiddingfold Road, Dunsfold, referred to as “HA3” in the regulation 14 consultation version of the Dunsfold Neighbourhood Plan.

In order to proceed to referendum, the Neighbourhood Plan is required to comply with the ‘Basic Conditions’ as set out in paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. These conditions are considered to have been passed and are referred to throughout this letter.

Prior to the submission of these representations, the landowner and team have engaged with the parish council and members of the Neighbourhood Plan Steering Group on several occasions to ensure that there has been active and ongoing engagement throughout the Neighbourhood Planning process.

Background to Wetwood Farm

Wetwood Farm is located on the northern side of Chiddingfold Road to the South-West of the Village of Dunsfold.

The site is occupied by 4 large buildings and smaller detached outbuildings which were originally constructed in c.1962 and have been previously used as a poultry facility for the rearing of chickens.

The total farm area extends to 2.1 ha.

The existing buildings have the benefit of a series of approvals for conversion to residential dwellings or flexible storage. There is a substantial area of existing building footprint, floor area and volume.

There is an area of Ancient Woodland around part of the site. The whole site is also situated within an Area of Great Landscape Value but not within an Area of Outstanding Natural Beauty.



The Site is not within an area at risk from flooding, being located within Flood Zone 1..

The site is not within a Conservation Area nor is it in close proximity to any designated or non-designated heritage assets.

The site is outside of the 7km buffer zone to the Thames Basin Heaths Special Protection Area.

Planning History of Wetwood Farm

The site has been the subject of previous Prior Approval Applications to convert two of the existing buildings on the site to a total of five houses under Class Q of the Permitted Development regulations. Both applications were approved with permission granted. A

further building was granted permission to change to storage under Class R of the Permitted Development regulations.

A full planning application was submitted in December 2021 for the demolition of existing buildings and construction of 12 dwellings with associated access, parking and amenity areas. A further application has recently been submitted in September 2022 of the same description (App Ref: WA/2022/02373) with an alternative layout which responds to comments made by the Forestry Commission in relation to Ancient Woodland.

Provision of Housing and Allocation of Wetwood Farm

Policy HO1 of the Draft Neighbourhood Plan sets out the provision of housing to meet the requirement for 103 net additional dwellings from 2013 to 2032 as prescribed by the Local Plan Part 1.

Taking into account the delivery and deliverable commitments of 68 dwellings the Draft Plan seeks to allocate five sites for delivery of housing as set out below:

Supply Source	Dwellings (net additional)
Completions and deliverable commitments (2013 to 2022)	68
HA1: Alehouse	4
HA2: Coombebury	12
HA3: Wetwood Farm	7
HA4: The Orchard	2
HA5: Springfield	10
Total Dwellings	103

The wording for Wetwood Farm (HA3) sets out the following:

The Wetwood Farm site is allocated to deliver 7 dwellings.

Development proposals will need to be accompanied by evidence confirming that wastewater can either be disposed on-site or that there is sufficient capacity within the wastewater network.

The supporting test against policy HA3 sets out the following:

5.26 *Planning permission has already been granted for 5 houses under PRA/2020/0011 and PRA/2020/0027. It will deliver a further seven dwellings, giving 12 in total on the site.*

The wording of the plan is explicit that **the seven dwellings are in addition to the permission for five dwellings already achieved through the prior approval applications.**

The present residential application for 12 dwellings (App Ref WA/2022/02373) is therefore in compliance with the emerging Neighbourhood Plan.

An extract from the Site Assessment and Selection paper which forms a key part of the evidence base for the plan is set out below:

Site Name:	Wetwood Farm Poultry
Site Reference:	DNP3
Assumed Dwelling Capacity:	12 but planning permission already granted for 5 houses (PRA/2020/0010PRA/2020/0011) plus a warehouse: (PRA/2020/0027)
Site Area:	0.95
Density:	12.6 dph.

Site Selection Principle	Summary of Assessment	RAG Rating
S1: Scale and Density	The assumed dwelling capacity is above the major development (10 dwelling) threshold. Density is below 15dph.	Red
S2: Land Use	The site is a mixture of greenfield and redundant agricultural buildings.	Green
S3: Location and Coalescence	Although outside the settlement area there are a number of dwellings surrounding the site. The site would therefore not constitute an isolated home in the countryside. The site does not reduce the gap between Dunsfold village and Dunsfold Park.	Green
S4: Natural Environment	There are pockets of Ancient Woodland within and adjoining the site the north east. Reuse or redevelopment within the existing footprint of the buildings would not have a detrimental impact on the Ancient Woodland. With the exception of being within an AGLV, the site is not within or adjoining any other environmental designations.	Yellow
S5 Flooding	The site is within Flood Zone 1.	Green
S6: Heritage Assets	No heritage assets are within or adjoining the site.	Green
S7: Community Facilities	Development would not put at risk the Common, existing sport / recreational and cultural facilities and other community assets.	Green
S8: Access and Highways	The site has access to highway but walking to existing facilities and services is not considered practicable.	Yellow
S9: Infrastructure	There are potential sewerage infrastructure capacity constraints.	Red
S10: Deliverability	There are no known deliverability constraints.	Green

In relation to Scale and Density the red RAG rating is not supported. It is considered that the development of the site is at a density which is entirely appropriate for the site and represents a reduction in building footprint in comparison to the existing buildings on site. Therefore, the RAG Assessment for S1 should be amended to Green.

In relation to Infrastructure, it is confirmed that there is adequate sewage capacity on the site. The current planning applications on the site have proposed a sewage treatment plant on site. No objections were raised against this as part of the previous determination process from either the Surrey County Lead Flood Authority or Thames Water. See latest response from Thames Water attached dated 21st September 2022

Consideration of Basic Conditions

The Basic Conditions which the Neighbourhood Plan is required to meet are set out below with commentary provided against each in turn.

- a. *having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).***

Section 3 of the Draft Neighbourhood Plan sets out the detailed Planning Policy Context in relation to National Planning Policy and Guidance;

- b. *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order.***

Section 2 of the Draft Neighbourhood Plan sets out consideration to the listed buildings in the village with the map at figure 2.2 setting out the position of these. It is clear that the Neighbourhood Plan seeks to preserve any listed buildings and directs development to positions away from these.

The development of Wetwood Farm for housing would have no impact on any listed buildings and features and no objections were raised to previous applications on this basis.

- c. *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order.***

Section 2 of the Draft Neighbourhood Plan sets out consideration to the conservation area in the village with the map at figure 2.2 setting out its location. It is clear that the Neighbourhood Plan seeks to preserve or enhance the character or appearance of the conservation area and directs development to positions away from it.

The development of Wetwood Farm for housing would have no impact on the conservation area and no objections were raised to previous applications on this basis.

d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

Section 4 of the Draft Neighbourhood Plan demonstrates the overall vision through planning principles which would contribute to achieving sustainable development.

Subsequent sections of the Draft Neighbourhood Plan set out the approach to 'Natural Environment'; 'Environment, Sustainability and Design'; 'Transport and Getting Around'; 'Recreation, Leisure and Wellbeing'; and 'Infrastructure and Delivery', all of which will assist in achieving sustainable development

e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

Section 3 of the Draft Neighbourhood Plan sets out conformity of the plan with Surrey County Council policies and Waverley Borough Council Planning Policies.

As set out, the Local Plan Part 2 is currently undergoing examination and is expected to be adopted later in 2022. However, it is not necessary for this to be adopted ahead of progression of the Dunsfold Neighbourhood Plan as the mechanism, housing target and principle is all contained within the adopted Local Plan Part 1.

f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

As required, the Neighbourhood Plan is compatible with the EU regulations as incorporated into UK law under the 4 EU Directives. The Draft Neighbourhood Plan is accompanied by a Strategic Environmental Assessment (July 2022) which assists in ensuring that the strategy is assessed against Environmental Regulations.

Conclusions

It is considered that the Neighbourhood Plan would meet the required basic conditions and should proceed to the next stages. The overall approach and strategy is supported as is the intention to allocate Wetwood Farm for residential development.

For the reasons previously explained, we also recommend that the RAG assessment for Wetwood Farm in respect of items S1 & S9 should be changed to Green.

It remains our firm intention to work with the Neighbourhood Plan Steering Group and the Parish Council and other stakeholders to support the forthcoming stages of the Neighbourhood Plan process.



Thank you for considering our comments.

Yours sincerely,

XXXXX

XXXXXX

Enc: Comments from Thames Water in respect of App Ref: WA/2022/02373



03 October 2022

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Our Ref - AP/NS/Dunsfold

Dear Sirs,

REPRESENTATIONS TO DUNSFOLD NEIGHBOURHOOD PLAN – REGULATION 14 DRAFT – JULY 2022

Pearce Planning Limited have been instructed by Cognatum Estates to submit representations to the current consultation on the Dunsfold Neighbourhood Plan 2013-2031 Regulation 14 Draft (July 2022). Specifically, these comments relate to proposed Policy HO1: Provision of Housing, HA1: Alehouse.

Cognatum Estates

Cognatum Estates is an independent not-for-profit retirement estate management company and is a member of the Association of Retirement Housing Managers. At the forefront of exclusive retirement property development for over 40 years, they own and manage over 60 estates with around 1,500 properties, and over 2000 residents. Every property ensures space and privacy, without the worry of building and garden upkeep and can easily be adapted to meet additional needs later if required.

Cognatum have responded to the stated demand for retirement homes in Dunsfold and made clear their interest in developing the Alehouse site proposing that the properties would be designed exclusively for the over 55's.

It is important for all Cognatum's estates to be fully integrated into the local communities in which they sit and to be supportive of the local economy, facilities and businesses. In this case it is envisaged that they would work closely with The Sun Inn to provide residents with a 'community' facility providing a range of services. This could include delivery of essential shopping to the front door, receipt and collection of deliveries, a communal and sociable place for residents to meet, cleaning, domestic and maintenance services, delivery of pre-prepared food directly to the residents own homes and simply being a 'good' neighbour, supporting owners to live independently on the Estate. Details of this model can be discussed directly with the owners of The Sun Inn. The estate would also generate high quality local employment, for example estate management staff and using local contractors, such as landscape gardeners. Further information in relation to Cognatum Estates can be found on the following website:- www.cognatum.co.uk

The comments provided below are therefore in the context of the above aspirations of Cognatum Estates. Cognatum have been keen to work with the Parish Council and in accordance with the emerging Neighbourhood Plan and are pleased to be able to have the opportunity to be part of this consultation.



Draft Policy HO1: Alehouse

Draft policy HO1 puts forward 5 sites that are proposed to be allocated for residential development to deliver 103 net additional dwellings in the 2013 to 2032 period. This is to meet the requirement to provide a **minimum** of 100 dwellings at Dunsfold as required by Policy ALH1 of Waverley Borough Council (WBC) Local Plan Part 1: Strategic Policies and Sites (February 2018).

It is important to emphasise that Waverley Borough Council (WBC) do not currently have a 5-year housing land supply and therefore it is essential that sufficient sites are allocated with appropriate densities in order to help address this current deficit and to defend inappropriate development proposals not wanted by the local community. WBC was quoted as having a 4.25 year housing land supply as of June 2022.

With this in mind, draft policy HA1: Alehouse proposes to allocate the site for 4 retirement dwellings to be occupied by those aged 55 and over. This represents a significant reduction in the number of dwellings originally proposed on the site at the previous Cognatum community consultation event (11 dwellings) and subsequent Neighbourhood Plan (NP) consultation where a revised scheme with 10 dwellings was proposed. For reference, 10 dwellings were proposed in the pre-application submission to WBC which has been shared with the Parish Council. There was no indication from WBC that this proposal was over-development.

We note that the current draft of the NP states in the accompanying evidence document '*Site Assessment and Selection*' (July 2022) that *"In response to the consultation feedback and further consideration of the Alehouse site by the Steering Group the potential capacity of the site was revised down from 10 dwellings to 4 dwellings. Informed by AECOM's Housing Needs Assessment the Steering Group also decided that any dwellings on the site should be restricted to residents aged 55+ to help meet identified local needs for housing for an ageing population."*

Cognatum strongly support proposed allocation HA1: Alehouse and the intention that any dwellings on the site should be restricted to residents aged 55+. It is however firmly considered that 4 dwellings is too low a density for this site, especially as it is such a big reduction from the 10 dwellings previously proposed and tested at pre-application with WBC. Whilst Cognatum would support 4 dwellings, to make the site more attractive for residents by reducing service charges per dwelling and creating a stronger community, it would be better to have more homes. As a result, Cognatum has considered the reasons for the reduction and proposed a potential reduction from the pre-application proposals to 6 dwellings, which improves the offer and creates some flexibility on other sites to relax their densities. Allocating the site for 10 dwellings would of course provide greater flexibility elsewhere and further reduce service charges and create more homes for retirement age in the village, so this would have more benefits to Dunsfold residents.

Further information is provided below as to why we feel the Alehouse site should accommodate more than 4 homes. This submission also includes an indicative scheme showing how a 6-unit scheme could be accommodated on the site (see **Appendix 1**) whilst having regard to the various planning considerations and pre-application response from WBC on the 10 dwelling scheme. The alternative 10-unit layout is also included as this is still felt to be appropriate and allows a greater mix and reduced service charge (see **Appendix 2**). As shown on the indicative plans, one key feature of these homes is that they will include space for home working as well as on site allotments for the residents. In addition, all car ports will have an electric vehicle charging point for cars and bikes, as well as solar panels on the roof, adding to the sustainability credentials of the site.

Reinforcing the support for development of the site for a retirement scheme the '*Dunsfold Parish Housing Needs Assessment*' (July 2018) and '*Dunsfold Neighbourhood Plan Site Assessment Report*' (November 2018) confirms the site:-

- Is very well located for village services being in a central village location, including public transport, pub and local shop.
- Is adjacent to the settlement area and does not reduce the gap between Dunsfold village and Dunsfold Park.



- With the exception of being within an Area of Great Landscape Value it contains or is adjacent to no policy or environmental designations.
- Has a low sensitivity to development in landscape terms.
- Would result in no loss of high quality agricultural land.
- Due to the scale and nature of development would not be large enough to significantly change the size and character of the settlement.

In addition to the above, the sustainability of the site will be improved with the significant development proposed at Dunsfold Aerodrome (WBC Local Plan Policy SS7). This will bring significant infrastructure local to the area and will improve the sustainability of the site.

There is a compelling case for development of Alehouse; an urgent need for older people's housing, the strong suitability of this site for such housing when compared to other alternative sites, the eminent suitability of Cognatum's proposal to meet the need and the fact that Cognatum are positioned with The Sun Inn to deliver such proposals.

Background and Previous Involvement

Cognatum Estates' have promoted the site through the Neighbourhood Development Plan process previously, and the proposals have been to a great extent supported through the previous rounds of consultation by the local community. Regular contact has taken place with Dunsfold Parish Council, the NP team and their advisor, which shows the dedication of Cognatum Estates to work with the Parish Council alongside the NP process.

In addition to promotion through the NP the site has also been the subject of previous public consultation events where it was generally well received for a retirement living proposal. A pre-application enquiry to WBC was also submitted in 2018 and again in November 2020.

Prior to submission of the pre-application enquiry the proposals were presented to the Parish Council via a virtual meeting in September 2020 and comments were sought from immediate neighbours surrounding the site. A presentation was then sent to the wider community of Dunsfold via publication of a brochure on social media and local e-newsletter channels.

Cognatum have reviewed the feedback from the first consultation processes and assembled a new team of professionals to review the site and amend the original concept in line with suggestions made during this initial process. This has included a new more sympathetic design, a reduction in the number of homes proposed from 11 and the removal of a club house building and three storey building. A technical team has also reviewed the site characteristics and provided inputs on landscape, ecology, transport and drainage to ensure there are no technical reasons as to why the site could not be developed for a retirement scheme. A string of evidence base supports the development of Alehouse.

Design Evolution

To summarise the design evolution of the scheme, the original submission to the NP as a Site Allocation in December 2018 proposed 11 homes and a resident clubhouse. This was the subject of a consultation event via an exhibition by Cognatum Estates in October 2018. Following this the scheme design was amended to take on board the comments made during the consultation, removing one unit and the central building and a further public consultation event took place in October 2020. This scheme was also then submitted to WBC as a pre-application enquiry in November 2020, proposing 10 no. retirement living homes, and a service strategy involving The Sun Inn rather than a bespoke clubhouse. The pre-application response received from WBC made no reference or indication that a proposal for 10 no. units would be over development of the site. The reduced number of homes and a more sympathetic design was considered to better respond to the historic context and neighbourhood amenity in line with the draft NP policies. The scheme carefully responded to the need to respect existing hedgerows and the adjacent listed buildings and conservation area



setting through sensitive design. The previously proposed 3 storey structure was also removed and it was ensured that all the properties sat more comfortably in the site.

Cognatum are now considering presenting a 6-no. unit retirement living development and indicative plans of how this could be accommodated on the site have been included with this submission at **Appendix 1**. This has been prepared in direct response to the proposed 4-unit allocation to allow full consideration of the capacity of the site and benefits derived from increasing the capacity to 6 units, or retaining it at 10 units, which provides the most flexibility on unit numbers for other sites and provides more new retirement homes in Dunsfold, which are in great need.

As referenced above, a key feature of these homes is that they will include space for home working as well as the option for single floor living with a ground floor bedroom suite. Small, low-maintenance private gardens are provided as well as communal gardens and on-site allotments for the residents. The houses have been grouped to create a feeling of care and community and the design and quality of them are focused on the needs of those who spend more time in their own home. With most of the floor area at ground floor level, design impact and potential for overlooking is reduced.

Grouping of a larger number of houses also means that care and healthcare can also be more efficiently provided with more visits at one time.

Designs have been based on Lifetime Homes and HAPPI Standards. The units are suitable for wheelchair users, have kitchens and electrics designed for ease of access and usage, as well as being designed to be full adaptable for increasing frailty.

In addition, all car ports will have an electric vehicle charging point for cars and bikes, as well as solar panels on the roof, adding to the sustainability credentials of the site.

The site is well suited to housing for older residents as is it level and situated in the heart of the village within easy walking distance of local facilities, which will help reduce feelings of isolation and loneliness and gives the site an advantage over some of the other proposed allocations. Providing specific housing for older people will also help to free up larger 'family' housing elsewhere in the village.

Landscape Context

It is acknowledged that the site is sitting in an Area of Great Landscape Value and also in a rural area outside the Green Belt at this time. It is also within the heart of the village and has development on three sides. The site is next to a conservation area and is adjacent to some listed buildings which are however a reasonable distance from the site boundary. It is considered that the above characteristics are positive providing an easy level walk to the village facilities for elderly residents and building in the heart of the community rather than on a more distant unrelated greenfield site.

The proposals have been drawn up to respect these conditions and through the application of careful design and layout the site can deliver much needed managed retirement living for 6 to 10 homes which will be befitting of the area and respectful to existing listed buildings, their setting and curtilage.

Deliverability

It is felt that a 6-home scheme is in keeping with the aspirations of the draft NP, whilst still ensuring that the development will be viable and will contribute to the local community. A 10-home scheme provides greater flexibility elsewhere in the village whilst being considered appropriate by WBC from the pre-application response.

Critical when planning developments is that they are deliverable and developable and there is concern that a 4-home scheme on the site may not achieve this and would be sub-optimal from a management perspective. Part of being deliverable and developable is that there is a realistic prospect of housing being



viably delivered on the site. A 6 to 10 home scheme would allow services to be shared and provide more choice and a range of homes for purchasers as it could accommodate a mix of unit sizes (i.e. some small, some midsize and some larger units). A 4-unit scheme would require all of the units to be large in order to achieve the square footage required to make the scheme viable and could result in a less sympathetic layout, as well as being more limited in the mix offered. A 6 to 10 home scheme would also be more beneficial to help to sustain the local community and its facilities/businesses including The Sun Inn.

A 4-unit scheme would create a very low-density scheme (approximately 6.45dph) which is arguably inconsistent with national policy which is explicit that where there is an existing or anticipated shortage of land for meeting identified housing needs (as is currently the case in WBC), planning policies and decisions should avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. It will allow other sites to breathe out and reduce their density and help provide a 5-year supply and protect other land from speculative developments.

In order to demonstrate and compare the difference of the previous 10 home scheme and the revised 6 home scheme we have provided indicative plans showing a comparison of both (see **Appendix 3**).

When the site was previously assessed as a 10-dwelling scheme by AECOM it was concluded that, whilst the density of built form would be greater than the area surrounding the site, it was still considered to be broadly in keeping with the character and setting of the site, its wider vicinity and the Parish. Based on this it is therefore considered that a 6 to 10 home scheme should be acceptable and would be more in line with planning policy than 4 units. Either scheme would deliver a density lower than the national recommended standard but would respect the local context.

National Planning Policy Framework

When considering the draft NP policies it is also important to take into account the guidance within national planning policy, in particular the National Planning Policy Framework.

Paragraph 60 is explicit that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Paragraph 62 states the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, **older people**, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

Para 66 advises that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

Para 69 iterates that small and medium sized sites can make an important contribution to meeting the housing requirement of an area.

Para 79 states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.



Para 124 also advises that planning policies and decisions should support development that makes efficient use of land. Furthermore para 125 goes on to state that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.

It is clear that development of the Alehouse site will achieve these objectives.

Identified Need

As stated in the evidence base to the NP and the WBC Local Plan, there is a significant local need for older persons housing in Dunsfold. This is set out in both the WBC Local Plan and the supporting evidence documents of the draft NP. In particular, the AECOM Housing Needs Assessment identifies 60% of the population being over 45. The greatest need of dwelling size is also two- and three-bedroom units (approximately 70% of the need). Therefore, Cognatum have tried to directly respond to these local needs in the proposals. The proposals can also potentially help free up some under occupied larger housing units in Dunsfold for local families by providing much needed high quality appropriate accommodation and support services for older people.

Other Comments

As currently worded Policy P02: Spatial Development of Dunsfold is not as clear as it could be about when development proposals will be permitted outside the settlement area. It currently states that this will only be permitted where proposals are *"on 'previously developed land', subject to other applicable policies in the NP"* and where they meet the other two criteria listed under this part of the policy. Whilst we appreciate that development on greenfield sites would also be permitted where allocated in the NP, we feel that this should be explicitly stated within policy P02 to avoid any confusion.

We note the policy RL02: Retention of Assets of Community Value (ACV) and supporting text within the draft NP which references an aspiration to designate The Sun Inn public house as an ACV. Paragraph 10.12 states that proposals that enhance the viability and/or community value of any assets designated as ACV will be supported. As referenced above, development of the site could reinforce the protection and viability of The Sun Inn which could form an integral part of the service delivery to residents.

Summary

The location of the site is immediately adjacent to the settlement boundary, surrounded by built form on three sides and would be a natural and discreet extension to the village. Cognatum's proposals have been the subject of promotion through the NP process and have been generally well supported through the initial consultation of potential sites by the local community.

Development of the site could reinforce the protection and viability of the adjacent community asset (The Sun Inn PH) which could form an integral part of the service delivery to residents. The proposal will seek to promote biodiversity through enhanced habitat creation and retain a buffer to the AONB providing a definitive boundary to Dunsfold. It will also provide a very attractive and landscaped site which delivers much needed homes for older people.

The policy evidence base identifies a clear increasing need for specialist housing for older people given the significant population of over 65's in this area. The site is ideally placed to deliver this type of housing being in the heart of the village, within a level and easy walking distance to local facilities, which gives it an advantage over the other proposed allocations.

The AECOM report for the Neighbourhood Plan prepared in November 2018 is positively supportive for the development of the site for 10 homes to deliver the specific housing need and confirms the site as a suitable



location and the impacts to be minimal. It concludes that the site is appropriate for allocation and has minor constraints only.

Subject to clarification of Policy PO2 and consideration of an increase in the number of dwellings proposed from 4 to 6 to 10 homes, Cognatum Estates wholeheartedly support the allocation of this site for retirement development and would like to continue their dialogue with both the Parish Council and WBC to help to deliver these new homes as soon as possible.

If you require any further information on the proposals we would be delighted to provide this.

Yours sincerely

XXXX



1:500

0 5 10 15 20m

OPTION 1 6 house scheme





Rev	Date	Description	Drawn	Checked

Do not scale from this drawing
All dimensions are to be checked on site
Any discrepancies are to be reported immediately to the Architect or Main Contractor

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DESIGN AND PATENTS ACT 1988, HAVE BEEN GENERALLY ASSERTED

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Client
-

Project
Dunsfold
-

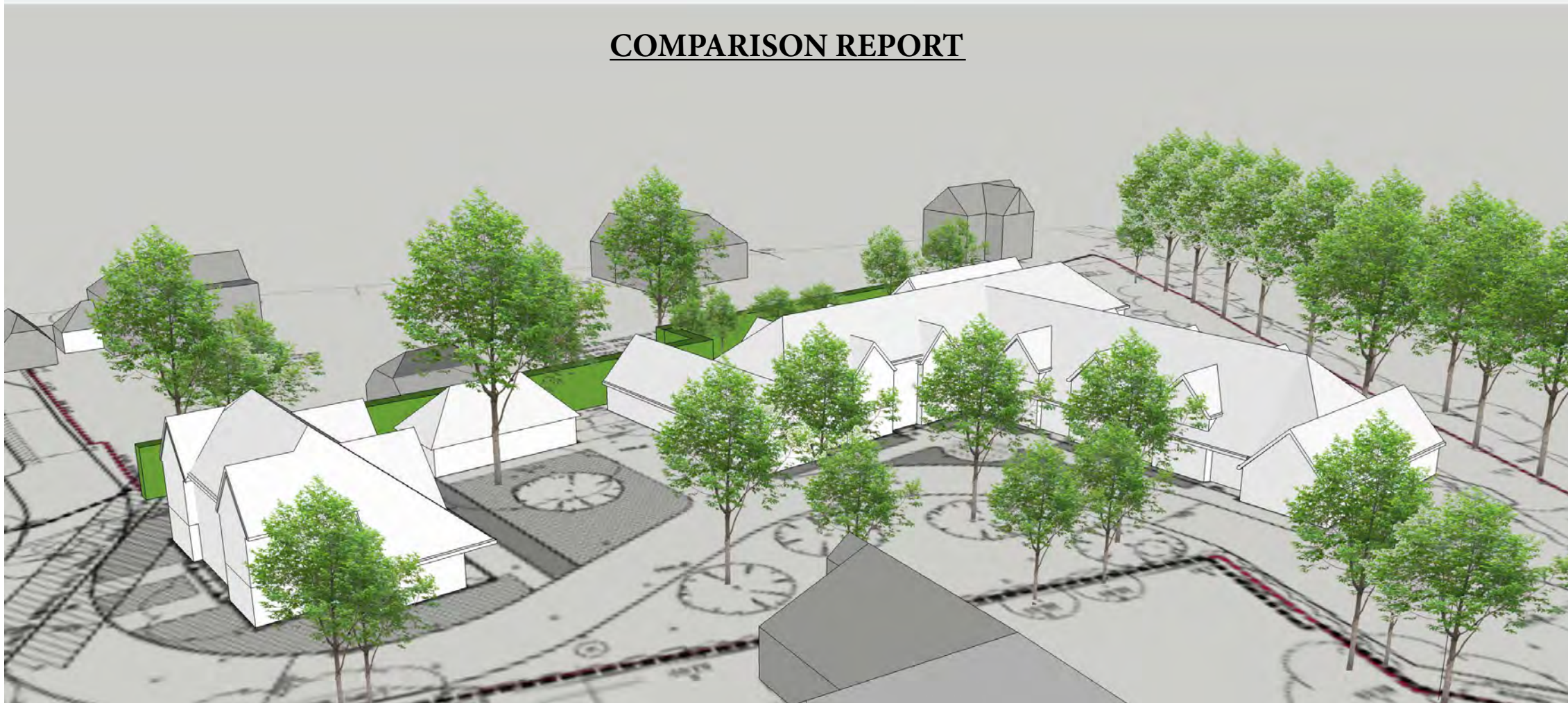
Drawing
Site Plan
Roof Plan
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Project No.	Drawing No.	Revision
183	101	A

Status	Date	Drawn by	Checked by
P	Nov 20	HD	RM

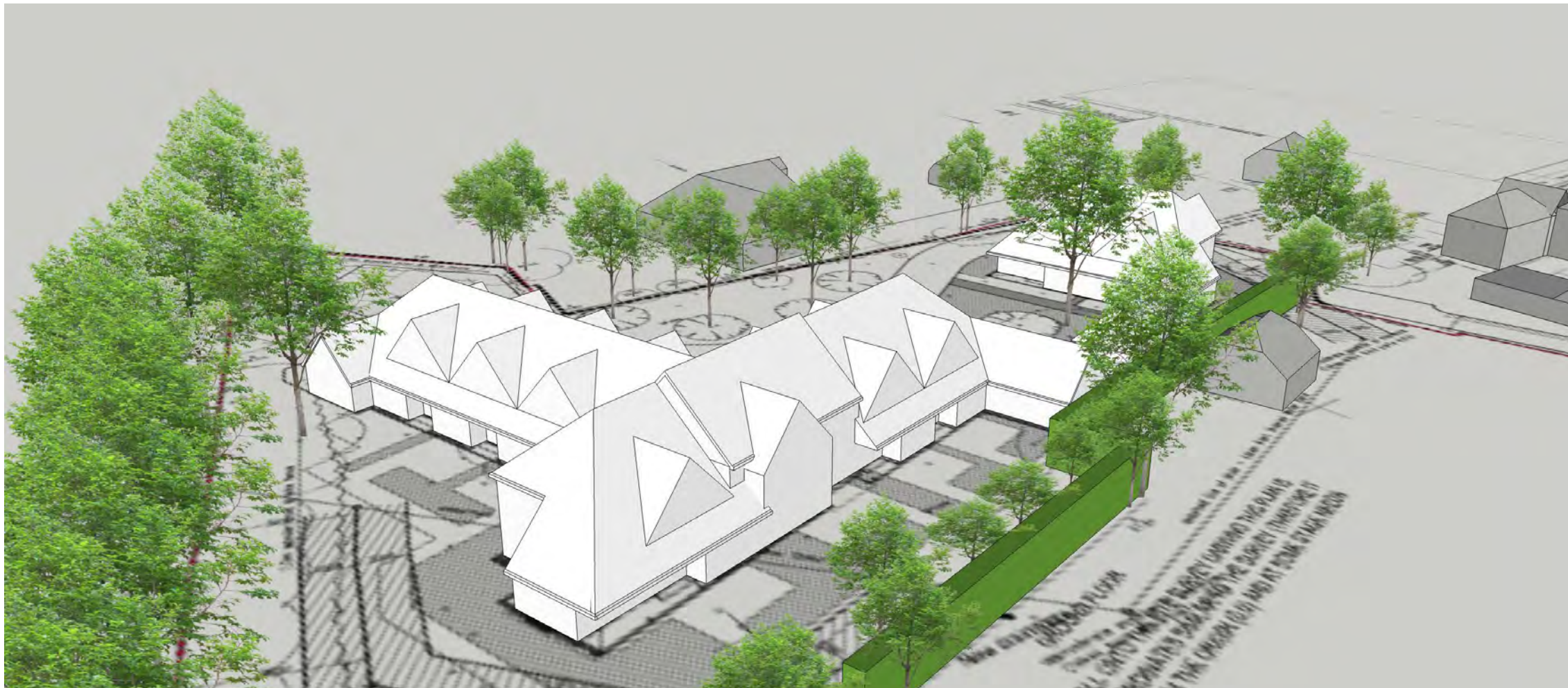
COMPARISON REPORT



**2020
Pre-App. Scheme
(10 houses)**



**2022
New Scheme - Opt.1
(6 houses)**



2020
Pre-App. Scheme
(10 houses)



2022
New Scheme - Opt.1
(6 houses)



**2020
Pre-App. Scheme
(10 houses)**



**2022
New Scheme - Opt.1
(6 houses)**



**2020
Pre-App. Scheme
(10 houses)**



**2022
New Scheme - Opt.1
(6 houses)**



**2020
Pre-App. Scheme
(10 houses)**



**2022
New Scheme - Opt.1
(6 houses)**



Dunsfold Parish Council
Unit 3
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Chiddingfold Road
Dunsfold
GU8 4PB

September 2022

Dear Sir / Madam

**Dunsfold Neighbourhood Plan – Regulation 14 Consultation
High Billingshurst Farm**

I write in response to the Regulation 14 Consultation for the Dunsfold Neighbourhood Plan. I am acting on behalf of the owners of High Billingshurst Farm and set out comments on their behalf.

In order to proceed to referendum, the Neighbourhood Plan is required to comply with the 'Basic Conditions' as set out in paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. These conditions are considered to have been passed and are referred to throughout this letter.

Background to High Billingshurst Farm

Details of the site

Relationship to Dunsfold Aerodrome.

Dunsfold Aerodrome is allocated under Local Plan Part 1 policy SS1 for 2,600 homes. The full wording of the policy is set out below:

Dunsfold Aerodrome, as identified on the Adopted Policies Map and on the plan below, is allocated for mixed use strategic development to accommodate housing, employment and associated supporting uses.

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



the significance of the heritage value of the site and conserve the site's heritage assets in a manner appropriate to their significance.

The setting of the Surrey Hills Areas of Outstanding Natural Beauty will be protected, in accordance with Policy RE3.

The scheme should include:

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



- k) *The reinforcement of existing utility infrastructure for electricity, gas, water and telecommunications to serve the development.*
- l) *An appropriate buffer between the permitted anaerobic digestion facility and any new housing development.*

Capacity / Masterplan

Site Assessment Process

The initial Site Assessment Report was produced by AECOM in November 2018. In relation High Billingshurst Farm, the Site Assessment Summary Table sets out the following (with emphasis added):

High Billingshurst Farm Site 1

This site as a potential site allocation should be seen in the context of the Dunsfold Park development. It is more appropriate for consideration through the Local Plan than the Neighbourhood Plan because Dunsfold Park is a strategic site which is largely outside the scope of the Neighbourhood Plan.

The site contains areas of Ancient Woodland and a Site of Nature Conservation Importance, as well as being adjacent to a Grade II Listed Building. There could be potential impacts on habitat should the site be developed. The development of the site could also, in the context of development at Dunsfold Aerodrome, contribute to coalescence with Dunsfold itself.

Despite the constraints, this site could be considered in future reviews of the Neighbourhood Plan if an extension to the Dunsfold Park development was considered acceptable by WBC.

High Billingshurst Farm Site 2

This site as a potential site allocation should be seen in the context of the Dunsfold Park development. It is more appropriate for consideration through the Local Plan than the Neighbourhood Plan because Dunsfold Park is a strategic site which is largely outside the scope of the Neighbourhood Plan

There are no environmental designations within or adjacent to the site, although there is a Grade II listed building close by, and although the site is surrounded by woodland on two sides, it is likely to feature in long distance views given its prominence and altitude and



setting within open fields. As such its development could have a detrimental impact on the AGLV.

Despite the constraints, this site could be considered in future reviews of the Neighbourhood Plan if an extension to the Dunsfold Park development was considered acceptable by WBC.

The Dunsfold Site Assessment and Selection Paper was then produced in July 2022 to support the current round of consultation and describes the two stages of consultation:

- *Stage 1: AECOM Site Assessment*

In 2018, Dunsfold Parish Council appointed AECOM to undertake a site assessment process to provide an independent assessment of the potential housing sites. (The appointment was made through Locality's Technical Support Programme.) The AECOM process assessed the sites using a standard Strategic Housing and Economic Land Availability Assessment (SHELAA) style methodology, taken from the Government's Planning Practice Guidance (PPG).

- *Stage 2: Dunsfold Site Selection Principles*

To take into account Dunsfold's specific factors, such as its rural nature, and the vital importance of avoiding coalescence with Dunsfold Park, the Steering Group developed a set of Dunsfold Parish specific site selection principles against which to assess the sites.

Paragraphs 2.7-2.12 set out the reasons that the NP Steering Group felt it necessary to depart from the AECOM conclusions and prepare their own assessment. Of relevance for High Billingshurst Farm is paragraph 2.10 which states:

Nor did AECOM put the same weight on the need to avoid coalescence, as did the Steering Group. Coalescence is only mentioned once in the body of their report in the context of site DNP13, High Billingshurst Farm Site 1. In addition, coalescence is stated not to be a problem even in DNP14, High Billingshurst Farm Site 2 or DNP9 New Pound Farm. The Steering Group does not agree.

Appendix 2 of the Site Assessment and Selection Paper sets out the approach to each of the individual elements against which the sites were assessed. In relation to Coalescence, the document sets out the following:



WILLOW TREE HOMES

DPSAP 3(2): Coalescence	
Assessment Element	RAG Rating
Development on the site would NOT contribute towards narrowing the physical and / or visual gap between Dunsfold village and Dunsfold Park.	Green
Development on the site would contribute to narrowing the physical and / or visual gap between Dunsfold village and Dunsfold Park	Red
Notes / Assessment Appraisal Guidance The assessment is based on mapping, including the Dunsfold and Dunsfold Park Green Gap, with local views and planning judgement. The Green Gap is shown in the Plan.	

DPSAP 3(2): Coalescence	
Assessment Element	RAG Rating
Development on the site would NOT contribute towards narrowing the physical and / or visual gap between Dunsfold village and Dunsfold Park.	Green
Development on the site would contribute to narrowing the physical and / or visual gap between Dunsfold village and Dunsfold Park.	Red
Notes / Assessment Appraisal Guidance The assessment is based on mapping, including the Dunsfold and Dunsfold Park Green Gap, with local views and planning judgement. The Green Gap is shown in the Plan.	

It is notable that the assessment of Coalescence is treated as a binary matter rather than the more nuanced approach of the AECOM report to other constraints.

The Site Selection and Assessment Paper goes on to set out a more detailed assessment of High Billingham Farm Site 1 and 2. The Assessment and commentary is identical for each site so they are combined in the table below with commentary against each:

Site Selection Principle	Summary of Assessment	RAG Rating
S1: Scale and Density	The assumed dwelling capacity is large scale major development. The assumed density is significantly above 15 dph.	Red
Whist development is at large scale it can be brought forward at a lower density in order to protect the character of the surrounding area.		
S2: Land Use	The site is greenfield and would not result in the loss of employment space. Development on the site would result in the loss of currently active agricultural land.	Red
The land and surrounding area is Grade 3 agricultural land so by no means the best and most versatile land which requires any level of additional protection		
S3: Location and Coalescence	The site is outside the settlement area. The site would contribute to the narrowing of the gap between Dunsfold Village and Dunsfold Park.	Red



Whilst there is some narrowing of the gap, a substantial gap would remain in place. Further commentary is set out regarding the weight that can be given to coalescence elsewhere in these representations.		
S4: Natural Environment	With the exception of the site being within an AGLV, the site is not within or adjoining any other environmental designations except that Ancient Woodland abuts the site to the west and south. Design and layout should be able to avoid any conflict between the Ancient Woodland and any development. Also, the development would impact the view from Hascombe Hill, in the AONB.	
The impact on the AONB could be mitigated through design and landscaping as with impact on Ancient Woodland.		
S5: Flooding	The site is within Flood Zone 1.	
This scoring is supported.		
S6: Heritage Assets	There are no known heritage assets within or adjoining the site.	
This scoring is supported.		
S7: Community Facilities	Development would not put at risk the Common, existing sport / recreational and cultural facilities and other community assets.	
This scoring is supported.		
S8: Access and Highways	No direct access to highway. Walking to existing facilities and services is not considered practical.	
The site would have a direct link to the facilities and services provided in the Dunsfold Aerodrome development as set out in the wording of the allocation.		
S9: Infrastructure	There are potential sewerage infrastructure capacity constraints.	
The development is of a scale where sewerage infrastructure capacity can be upgraded alongside the Dunsfold Aerodrome Development.		
S10: Deliverability	There are no known deliverability constraints. Proving a vehicular access to the site is also unclear.	
As set out, an access can be provided into the site, there are no known constraints to deliverability		



Dunsfold Green Gap

The Parish Council produced a paper on the proposed Dunsfold Green Gap (July 2022) which has been published as part of the Neighbourhood Plan consultation.

Reference is made to the use of a strategic / green gap by the Partnership for Urban South Hampshire (PUSH). The area covered by the PUSH Strategic Gap is significant and seeks to protect sprawl from large urban areas across 11 separate authorities. It is considered that its context is significantly different from that of Dunsfold.

As recognised in paragraph 11 of the paper, strategic/green gaps are **not** formally recognised in the National Planning Policy Framework or Planning Practice Guidance. It is acknowledged that there is already a strategic/green gap within the Waverley Part 1 Local Plan between Farnham and Aldershot. However, like the PUSH strategic gap, this area spans across two separate local authorities of Waverley and Hart District Councils. It has also not been deemed as an absolute constraint to development and in several instances appeal decisions have overturned this designation in favour of development with the most recent being 43 dwellings in Badshot Lea (APP/R3650/W/17/3180922)

The paper outlines the five criteria which have been identified to assess the appropriateness of, and extent of, the proposed Dunsfold Green Gap:

- (a) *Prevent coalescence of settlements.*
- (b) *Protect the identity and character of settlements.*
- (c) *Be no greater than is necessary to prevent coalescence and to maintain physical and visual separation.*
- (d) *Not preclude provision being made for some development within the gap.*
- (e) *Provide recreational value and green infrastructure and biodiversity opportunities.*

It is considered that the sites at High Billingshurst Farm could be developed without compromising any of these criteria and an ample strategic gap between Dunsfold and the Aerodrome could remain.



Consideration of Basic Conditions

The Basic Conditions which the Neighbourhood Plan is required to meet are set out below with commentary provided against each in turn.

- a. *having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).***

As set out it is not considered that the application of a Green Gap is within the remit of the Neighbourhood Plan and in any event has no relevance within National Planning Policy and advice.

- b. *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order.***

There are numerous listed buildings in and around the centre of the village. The proposed allocations would be close to heritage assets in many instances. There is no evidence to suggest that the Parish Council has considered reasonable alternative sites away from this area. Development at High Billingshurst Farm would have no such impact on listed buildings or heritage assets.

- c. *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order.***

There is a substantial Conservation Area in the centre of the village. The proposed allocations would be close to the Conservation Area in many instances. There is no evidence to suggest that the Parish Council has considered reasonable alternative sites away from this area. Development at High Billingshurst Farm would have no such impact on the Conservation Area.

- d. *the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.***

There has been little consideration within the Neighbourhood Plan of the proposed services which will be provided at the Dunsfold Aerodrome Site. Development within proximity to this site is considered to benefit from a significant increase in services in comparison to that available in the village itself. This has not been reflected in the scoring of potential development sites.

- e. *the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).***



It is not considered that the introduction of a strategic gap would be in accordance with strategic policies as set out in the adopted Local Plan Part 1 or the emerging Local Plan Part 2.

Conclusions

Considering the submissions set out within these representations it is not considered that the Neighbourhood Plan should proceed to the next stages of examination and adoption. The process followed by the Parish Council, particularly in reference to the Strategic Gap, is not considered to comply with the requirement to meet Basic Conditions.

The promoter of this site remains keen to discuss the potential development of this site with Dunsfold Parish Council.

Thank you for considering our comments.

Yours sincerely,

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