



# **Dunsfold Neighbourhood Plan**

## **Engagement Statement**

March 2023



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## Appendices (Separate Document)

**Appendix A:** January 2018 Public Meeting Presentation

**Appendix B:** Housing Development Survey Feedback Report

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## Section 1: Methodology

- 1.1 Prior to the formal public consultation being undertaken on the draft Neighbourhood Plan a series of engagement events, workshops and surveys were undertaken ("the Preliminary Consultations"), including:
  - Neighbourhood Plan Village Presentation, January 2018
  - Housing Development Survey, April 2018.
  - Village Survey, May – June 2018.
  - Village Meeting, February 2019.
  - Site Survey, 2021.
  - Parish Council meeting, December 2021.
- 1.2 In accordance with Regulation 14 of The Neighbourhood Planning (General) Regulations 2012 ("The Regulations"), formal public consultation on the draft Dunsfold Neighbourhood Plan was held between Friday 5 August and Monday 3 October 2022.
- 1.3 By virtue of detailing conformity with Regulation 14, this methodology section addresses Regulation 15(2)(a) and Regulation 15(2)(b) of the Regulations.
- 1.4 The primary advertisements of the public consultation, in accordance with Regulation 14(a) of the Regulations, were:
  - Leaflet drops to all households within the Neighbourhood Plan area;
  - Letters and emails to relevant consultation bodies; and
  - A page on the [www.dunsfoldparishcouncil.gov.uk/neighbourhood-plan](http://www.dunsfoldparishcouncil.gov.uk/neighbourhood-plan) website.
- 1.5 The primary advertisements, in accordance with Regulation 14(a)(i)-(iv), included:
  - Details of the proposals for a neighbourhood plan;
  - Details of where and when the proposals could be inspected;
  - Details of how to make representations; and
  - The deadline for representations.
- 1.6 The Neighbourhood Plan was made available:
  - Online – at [www.dunsfoldparishcouncil.gov.uk/neighbourhood-plan](http://www.dunsfoldparishcouncil.gov.uk/neighbourhood-plan);
  - As a hard copy reference document at the Parish Council office (standard and large print formats); and
  - Members of the Parish Council had a copy.



1.7 In addition to the primary advertisements, the consultation was promoted by:

- A post on the Dunsfold Village Facebook page "Love Dunsfold" (in excess of 908 members); and
- Notices sent on the Dunsfold E-News (300-400 members).

## Engagement Events

### Preliminary Consultations

- 1.8 In January 2018 the Parish Council held a public meeting to explain the Neighbourhood Plan process and why it was important for the Parish to prepare a Neighbourhood Plan. Over 100 people attended the meeting. A copy of the presentation is included as **Appendix A**.
- 1.9 In April 2018 a Housing Development survey was undertaken to gather views on the future development of housing within the Parish. The aim of the survey was twofold:
- To give residents an opportunity to provide an opinion on the issue of housing development within the village; and
  - To assess whether there was a need for housing amongst residents and if so for what type of housing.
- 1.10 26% of households within the Parish responded to the survey. A copy of the survey feedback report is included as **Appendix B**.
- 1.11 The Village Survey was carried out in May to June 2018. The Survey sought views on a wide range of issues including, but not limited to, services and amenities within the parish, the Village Shop, car parking and transport. A total of 176 responses were received, which represented 37% of households within the Parish. A copy of the Village Survey findings report is included as **Appendix C**.
- 1.12 A village meeting was held in the Winn Hall on 26 February 2019. Display boards showed information about possible housing site options, the results from the Village Survey conducted in 2018 and other information about the Parish and the Neighbourhood Plan. Over 100 people attended and were asked by Parish Council members to complete and return a feedback form relating to the Vision Statement for the Neighbourhood Plan, the proposed site selection policies and how housing should be spatially distributed within the Neighbourhood Plan area. In total, 103 forms were returned. A copy of the village meeting feedback report is included as **Appendix D**.
- 1.13 A survey of potential housing site options was undertaken between 19 March 2021 and 12 April 2021. A total of 75 responses from 68 different people / households were received. In addition to local resident feedback submissions were also received from the developers of three sites (Alehouse, Coombebury and Springfield). A copy of the consultation feedback report is included as **Appendix E**. A copy of the three developer submissions is included as **Appendix F**.

### Regulation 14 Draft Plan Consultation

- 1.14 A Public exhibition was held at The Winn Hall, Dunsfold on:
- Wednesday 31 August 2022 between 14:00 hours to 20:00 hours
  - Saturday 3 September 2022 between 10:00 hours to 16:00 hours.



- 1.15 A copy of the exhibition boards is included as **Appendix G**. Over the two days, a total of 76 people signed into the exhibition. Members of the Parish Council were available for questions and queries.
- 1.16 In addition to the public exhibition, two video conference drop-in sessions via Zoom were arranged where members of the Parish Council were available for questions and queries. The drop-in sessions were held on:
- Thursday 18 August, 20:00 hours to 20:40 hours
  - Tuesday 13 September, 20:00 hours to 20:40 hours.
- 1.17 A total of 5 people attended the two drop-in sessions.
- 1.18 Statutory consultees (detailed at Regulation 14(b) and Schedule 1 of the Regulations), known community groups and local businesses were invited to use the online questionnaire, or make direct representations to the Parish Clerk via email. In accordance with Regulation 14(c) of the Regulations, a copy of the proposals was distributed to the local planning authority.

### **The findings from the consultees and their impact on policy development**

- 1.19 The findings of the surveys and feedback from other consultees have been considered as part of the process of updating the Neighbourhood Plan for submission. A number of reasonable and appropriate points have been made by individuals or multiple respondents and have prompted policy amendments. In accordance with Regulations 15(2)(c) and 15(2)(d), Section 2 of this Engagement Report provides a summary of all responses, detailing the main issues and concerns raised by respondents, with an account of how the issues raised have been addressed.



## Section 2: Regulation 14 representations and updates to the Neighbourhood Plan

- 2.1 In accordance with Regulations 15(2)(c) and 15(2)(d) of the Regulations, this section of the report provides a summary of all responses, detailing the main issues and concerns raised by respondents, as well as information of how the issues raised have been addressed.

### Full Plan Consultation

- 2.2 An online questionnaire invited respondents to indicate their degree of support, or lack of it, for the Vision and for each policy; and to make suggestions about how the policies could be improved. The paper version of the questionnaire had the same format and questions.
- 2.3 A total of 58 responses from individuals were received either by: online or hardcopy questionnaires, or other forms of written response. In respect of the questionnaires, the number commenting on each policy varied from 38 to 20.
- 2.4 Six responses were received from the statutory consultation bodies, these being:
- i. Waverley Borough Council (WBC);
  - ii. Surrey County Council;
  - iii. Natural England;
  - iv. Historic England
  - v. Surrey Wildlife Trust; and
  - vi. Coal Authority.
- 2.5 Three developers, or their representatives, responded:
- i. Wetwood Farm – Andrew Black Consulting;
  - ii. Alehouse – Pearce Planning Ltd; and
  - iii. High Billingshurst Farm – Willow Tree Homes.
- 2.6 The comments in full are included in **Appendix H** (Online questionnaire written responses), **Appendix I** (Summary of written responses submitted by individuals), **Appendix J** (Responses from statutory consultees) and **Appendix K** (Responses received from Developers).
- 2.7 The responses to each chapter and the changes made are summarised below:

### Chapter 4: Vision and Key Planning Principles

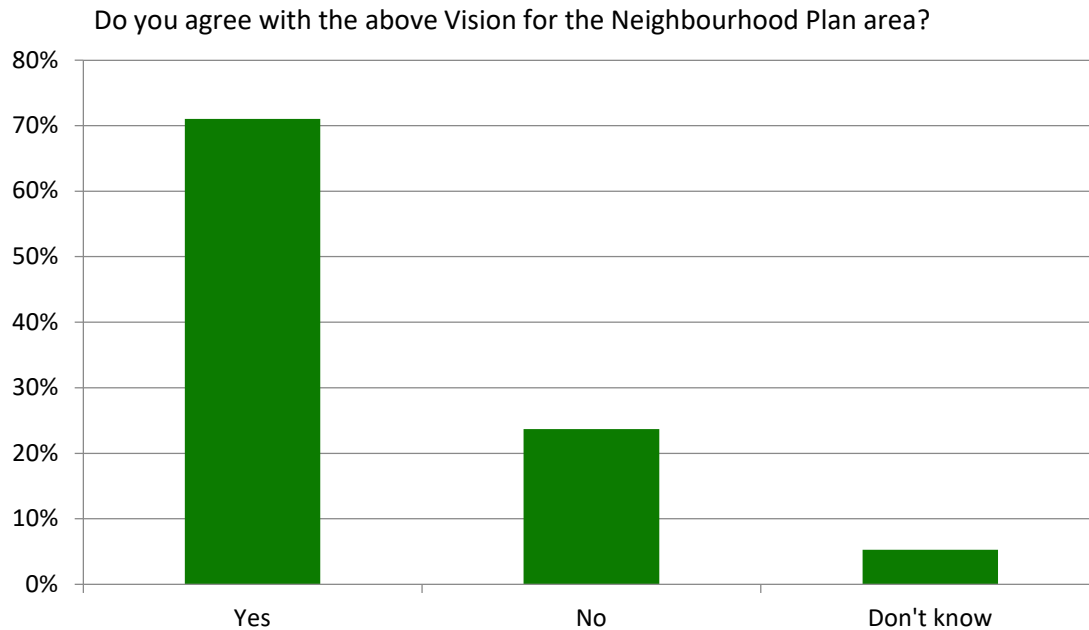
- 2.8 Question 1 sought views on the extent to which people agreed with Vision as included in the Regulation 14 consultation:

***Dunsfold will embrace the changing nature of modern life whilst preserving and enhancing the Parish's historic rural character. Dunsfold comprises the quintessential English country village and its network of surrounding hamlets, with the expectation that***



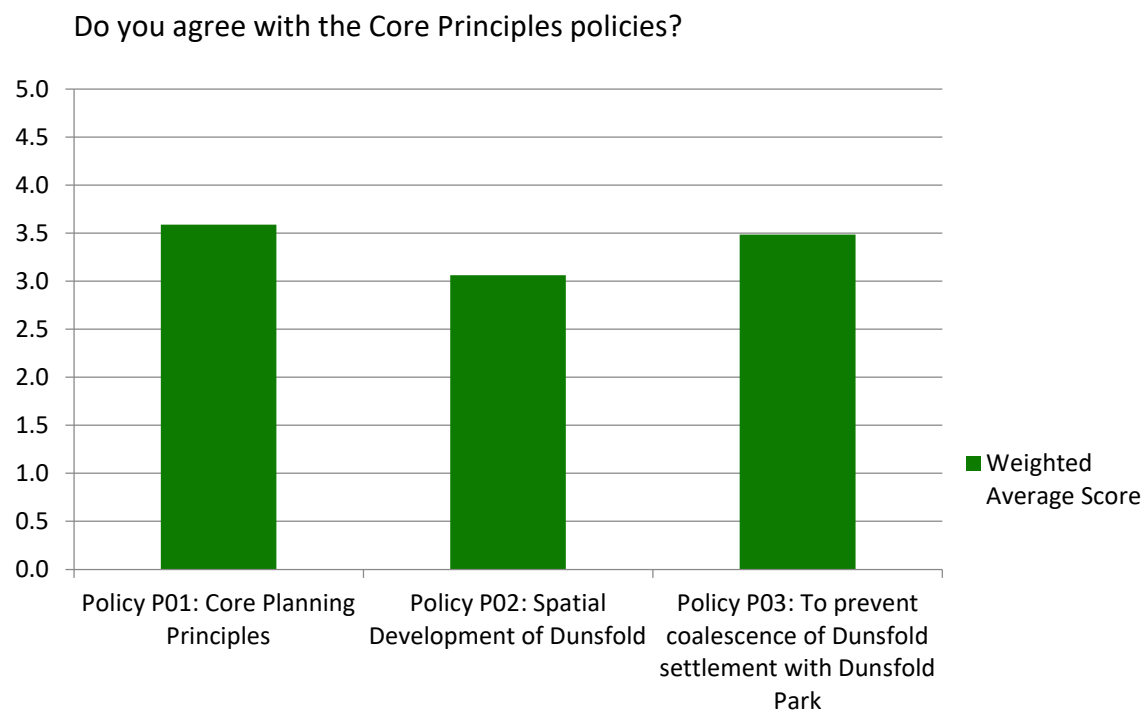
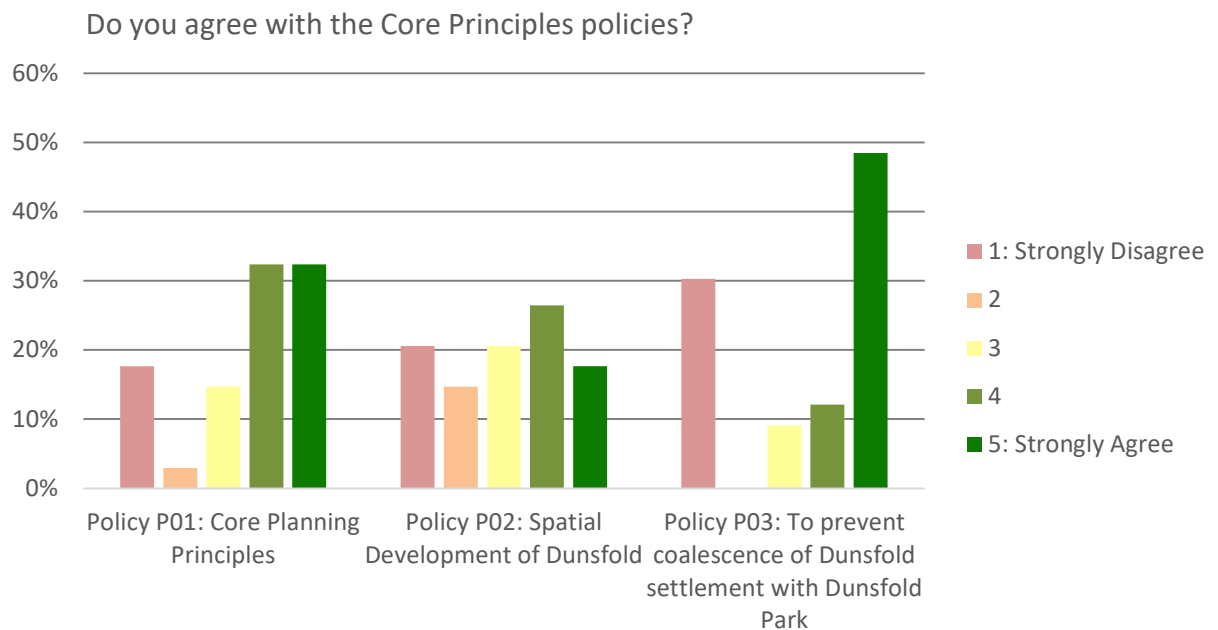
*it will be set within an Area of Outstanding Natural Beauty. Development changes to housing, employment, communications, transport, and community services will complement Parish life and integrate with existing buildings, the Common and surrounding countryside.*

2.9 Questionnaire results in response to the Vision are summarised below:



2.10 A vast majority of 71% of 38 respondents to question 1 supported the vision for the Dunsfold Neighbourhood Plan. Whilst 24% of respondents said that they did not support the vision only one written comment was provided, which recommended that the vision should be more aspirational as opposed to looking to maintain the status-quo.

2.11 Question 2 sought views on the extent to which people agreed the three Core Principles policies (P01 to PO3). Questionnaire results in response to the question **“On a scale of 1 to 5 (with 1 being “strongly disagree” and 5 being “strongly support”), how far to you agree following policies?”** are summarised below:



### Policy P01: Core Planning Principles

#### Consultation Questionnaire

- 2.12 65% of 34 respondents stated they either agreed (32%) or strongly agreed (32%) with Policy P01: Core Planning Principles. 21% of respondents stated they either disagreed (3%) or strongly disagreed (18%) with the policy. The remaining 15% of respondents stated they neither agreed nor disagreed with the





policy. The weighted average score for Policy P01 was 3.6 out of 5, which confirms overall broad agreement with the policy.

2.13 The written comments provided in relation to Policy P01 suggested:

- (a) Increase policy flexibility to accommodate potential changes to the Area of Great Landscape Value (AGLV) / Surrey Hills Area of Outstanding Natural Beauty (AONB) status (including the removal of AGLV status).
- (b) The policy should require more than just have 'regard' to the outstanding decision to extend the Surrey Hills AONB area to Dunsfold.
- (c) Provide further clarity over how 'have regard to' is achieved in practice and can be demonstrated.
- (d) Clarity over how and why the key views have been selected.

#### Statutory Consultees

2.14 WBC outlined that 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.

#### Other Written Submissions

2.15 Written submissions from local residents raised the following key point:

- (a) The draft Plan misrepresents the status of the current Natural England Boundary Review of the AONB. The 'expectation to be included' is opinion and not fact. This misrepresentation appears multiple times throughout the plan (Foreword, paras 1.11, 2.5, 3.5, 4.1, 6.1, and 7.1).

### **Policy P02: Spatial Development of Dunsfold**

#### Consultation Questionnaire

2.16 44% of 34 respondents stated they either agreed (26%) or strongly agreed (18%) with Policy P02: Spatial Development of Dunsfold. 35% of respondents stated they either disagreed (15%) or strongly disagreed (21%) with the policy. The remaining 21% of respondents stated they neither agreed, nor disagreed with the policy. The weighted average score for Policy P02 was 3.1 out of 5, which confirms overall broad agreement with the policy.

2.17 The written comments provided in relation to Policy P02 suggested:

- (a) The proposed housing allocations are outside of the settlement boundary so are in conflict with Policy P02. The policy should be amended to clarify that development proposals are permitted within the housing allocations.
- (b) Restricting development outside of the settlement boundary is inconsistent with national policy, which does provide for some development in rural areas.
- (c) Accepted that replacement dwellings should be appropriate to the plot, but rather than a simple footprint statistical comparison, consideration should also be given to other aspects such as design, environmental, social and health benefits.



### Statutory Consultees

- 2.18 Historic England outlined that it would have expected the policy to refer to the site allocations listed in the plan, as representing part of the spatial strategy for the Parish.
- 2.19 In respect of Policy P02, WBC outlined:
- (a) There are a number of policies within the emerging (now adopted) 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 WBC suggested that the same terminology of 'settlement boundary/boundaries' is used rather than 'settlement area'.
  - (b) WBC queried why the Dunsfold Neighbourhood Plan does not appear to amend the settlement boundaries, from that proposed within the emerging Local Plan Part 2. WBC queried why the proposed allocations close to, or adjoining, the settlement boundary is not proposed to be incorporated within the settlement boundaries for Dunsfold. It recommended that further thought should be given to whether amendments to the settlement boundary should be made.
  - (c) WBC stated that this policy appears to apply Green Belt level protection to the Countryside Beyond the Green Belt – this approach is not compliant with the NPPF. 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. It also queried the justification for Part c), as it appears to go beyond the NPPF paragraph 80 (a).

### Other Written Submissions

- 2.20 Written submissions to the Parish Council from local residents raised the following key point:
- (a) Development should be kept within the confines of the existing settlement and not developed into a small town.

### **Policy P03: To prevent coalescence of Dunsfold settlement with Dunsfold Park**

#### Consultation Questionnaire

- 2.21 61% of 33 respondents stated they either agreed (12%) or strongly agreed (48%) with Policy P03: To prevent coalescence of Dunsfold settlement with Dunsfold Park. 30% of respondents stated strongly disagreed with the policy. The remaining 9% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy P03 was 3.5 out of 5, which confirms overall broad agreement with the policy.
- 2.22 The written comments provided in relation to Policy P02 suggested:
- (a) The extent of the Green Gap appears arbitrary.
  - (b) There is no Local Plan or national planning policy regarding the creation of Green Gaps. The proposed policy is more onerous than Green Belt policy restrictions.
  - (c) More could be done around the aerodrome to take development away from Dunsfold itself.

### Statutory Consultees

- 2.23 In respect of Policy P03, WBC outlined:
- (a) It considers that the first part of the policy is consistent with other coalescence policies. 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. WBC suggested 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.

#### Other Written Submissions

2.24 The written submissions from local residents outlined the following key issues:

- (a) The principal of the green gap is supported, but analysis supporting its location along with an explanation as to why the Coombebury site has been excluded from its scope would be welcomed.

2.25 A written submission provided by Willow Tree Homes in respect of the High Billingshurst Farm sites (Site 1 and Site 2), raises concern that the application of a Green Gap policy goes outside the scope of a Neighbourhood Plan and in any event has no relevance within national planning policy. The policy fails to comply the Basic Conditions.

#### **Proposed Vision and Core Principles Policy Changes**

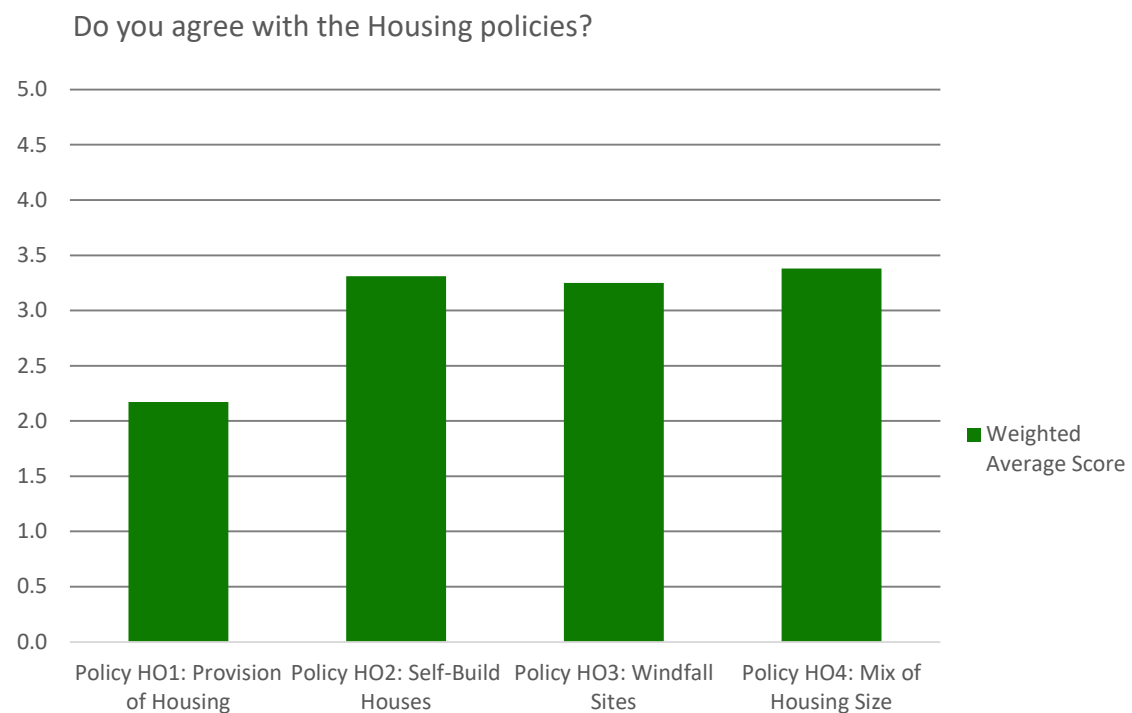
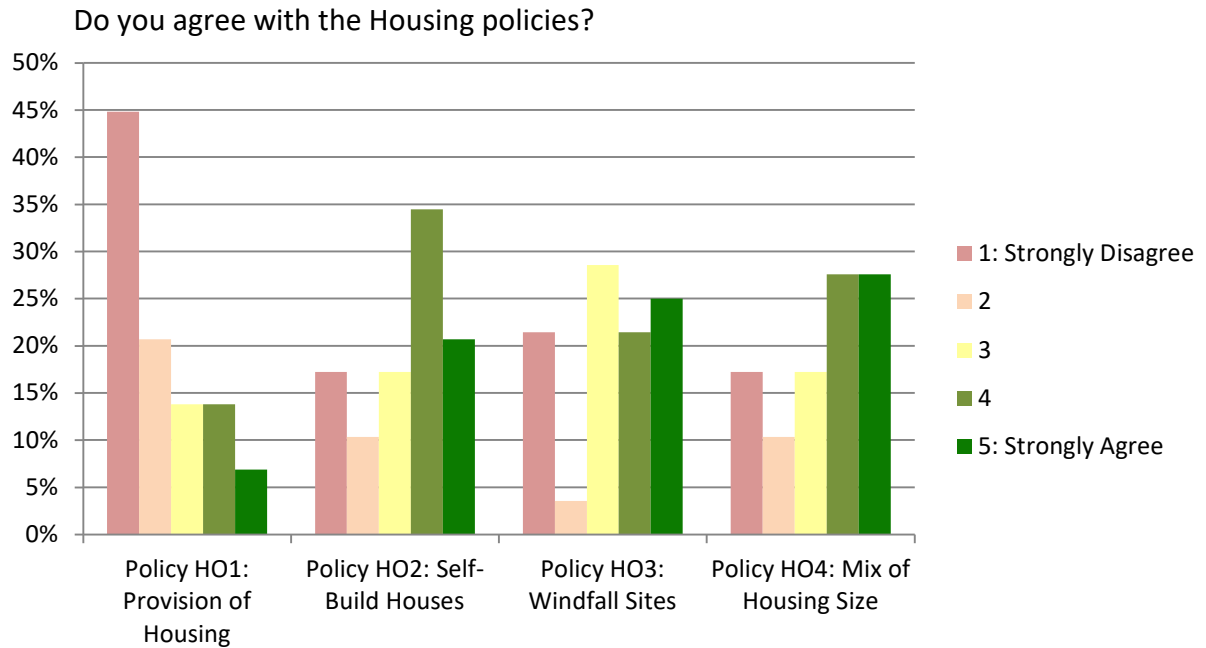
2.26 The changes made as a result of the consultation are summarised below:

<b>Plan Element</b>	<b>Summary of Change Made</b>
Vision	<ul style="list-style-type: none"> <li>There has been a minor change to the wording of the vision to take account of WBC's comments in relation to the extension of the Surrey Hills AONB not yet being confirmed.</li> </ul>
Policy PO1: Core Planning Principles	<ul style="list-style-type: none"> <li>Minor amendments to the wording have been made to reflect that the proposed extension to the Surrey Hills AONB has not yet been confirmed.</li> </ul>
Policy PO2: Spatial Development of Dunsfold	<ul style="list-style-type: none"> <li>Minor amendments to the wording have been made to ensure conformity with the recently adopted LPP2 in respect of references to the settlement boundary rather than area.</li> <li>Reference to figure 4.1 has been updated to figure 4.2 to ensure correct map is referred to. Figure 4.2 has been amended to include Policy HA1 and Policy HA2 within the settlement boundary.</li> <li>The wording has been updated to reflect that development outside of the settlement boundary can be acceptable in some cases, in line with the NPPF.</li> <li>In line with Historic England's comments, the wording has been amended to refer to Policy HO1 which sets out the allocations.</li> </ul>
Policy PO3: To prevent coalescence of Dunsfold settlement with Dunsfold Park	<ul style="list-style-type: none"> <li>The emphasis has been tweaked to make it clearer what the principle of the Green Gap policy is.</li> <li>Reference has been made to paragraph 80 of the NPPF to ensure that this policy does not seek to go beyond the provisions in national policy.</li> <li>The area covered by the Green Gap remains the same as it follows clearly defined boundaries on the ground and covers the area between Dunsfold and Dunsfold Park.</li> </ul>
General supporting text	<ul style="list-style-type: none"> <li>The general supporting text has been amended where necessary for clarity, to correct typographical errors and to reflect updated information.</li> </ul>



## Chapter 5: Housing

2.27 Question 3 sought views on the extent to which people agreed the four housing policies (H01 to H04). Questionnaire results in response to the question “**Do you agree with the following Housing Policies?**” are summarised below:





## **Policy H01: Provision of Housing**

### Consultation Questionnaire

- 2.28 21% of 29 respondents stated they either agreed (14%) or strongly agreed (7%) with Policy H01: Provision of Housing. 66% of respondents stated they either disagreed (21%) or strongly disagreed (45%) with the policy. The remaining 14% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy H01 was 2.2 out of 5, which confirms overall broad disagreement with the policy.
- 2.29 The written comments provided in relation to Policy H01 included:
- (a) Concern that the proposed allocations are inconsistent with the findings of the AECOM assessment and WBC's Strategic Housing Land Availability Assessment (SHLAA).
  - (b) Clarity over why the site allocations are outside of the settlement boundary which appears to conflict with the overarching Vision and key planning principles.
  - (c) Concern that the proposed density associated with the proposed allocations fails to make the most efficient use of land.
  - (d) The site allocations are of too small a scale to deliver the required quantum of affordable housing. Only one site would cross the affordable housing thresholds.

### Statutory Consultees

- 2.30 In respect of Policy H01, WBC outlined that it was pleased to see that the Dunsfold Neighbourhood plans to meet the minimum identified housing requirement in full.

### Other Written Submissions

- 2.31 No other written submissions were made in respect of Policy H01.

## **Policy H02: Self-Build Houses**

### Consultation Questionnaire

- 2.32 55% of 29 respondents stated they either agreed (34%) or strongly agreed (21%) with Policy H02: Self-Build Houses. 28% of respondents stated they either disagreed (10%) or strongly disagreed (17%) with the policy. The remaining 17% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy H01 was 3.3 out of 5, which confirms overall broad agreement with the policy.
- 2.33 The written comments provided in relation to Policy H02 included:
- (a) Clarity over why self-build is favoured over custom build.
  - (b) Clarity over what is meant by an 'individual' self-build – individual dwelling or development.
  - (c) The policy wording should be tightened up to prevent developers using this as a route to secure planning consent.
  - (d) Question the extent to which the policy can deliver many self-build homes due to the tightly drawn settlement boundary.



### Statutory Consultees

- 2.34 In respect of Policy H02, WBC sought clarity over whether the policy intention is to support self-build 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. WBC also noted that national policy and guidance does not distinguish between self/custom build and therefore it does not consider the detail within paragraph 5.29 is appropriate.

### Other Written Submissions

- 2.35 Written submissions from local residents raised the following key points:
- (a) Object to self-build dwellings because experience has shown that these always provide problems for neighbouring areas with noise, pollution, over-run, and irregular parking on a 24/7 day a week basis.

## **Policy H03: Windfall Sites**

### Consultation Questionnaire

- 2.36 46% of 28 respondents stated they either agreed (21%) or strongly agreed (25%) with Policy H03: Windfall Sites. 25% of respondents stated they either disagreed (4%) or strongly disagreed (21%) with the policy. The remaining 29% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy H01 was 3.3 out of 5, which confirms overall broad agreement with the policy.
- 2.37 The written comments provided in relation to Policy H03 included:
- (a) Windfall sites / units should be included in the overall housing allocation to alleviate pressure elsewhere.
  - (b) The policy should be more explicit about a preference for smaller mid-range / elderly friendly units.

### Statutory Consultees

- 2.38 In respect of Policy H03, WBC outlined that the policy as drafted appears to conflict with Policy P02: Spatial Development of Dunsfold as they set out different requirements for development outside of the village/settlement area. The approach of this policy appears to be inconsistent with national policy (NPPF) in a number of ways.
- 2.39 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. 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.
- 2.40 WBC also outlined that some of the plan's site allocations are in conflict with the policy – for example HA2: Coombebury which is outside of the settlement boundary/area. 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.
- 2.41 With regard to supporting text paragraph 5.31, WBC outlined that the paragraph appears to set additional expectations for windfall sites. It noted that it 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.



### Other Written Submissions

2.42 No other written submissions were made in respect of Policy H03.

### **Policy H04: Mix of Housing Size**

#### Consultation Questionnaire

2.43 55% of 29 respondents stated they either agreed (28%) or strongly agreed (28%) with Policy H04: Mix of Housing Size. 28% of respondents stated they either disagreed (10%) or strongly disagreed (17%) with the policy. The remaining 17% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy H01 was 3.4 out of 5, which confirms overall broad agreement with the policy.

2.44 The written comments provided in relation to Policy H04 included:

- (a) Space for homeworking is supported but concerned that in practice it will be achieved by additional dwellings.
- (b) Clarity over how space for homeworking be enforced for use as homeworking.
- (c) The policy only refers to bedroom numbers, which encourages apartments for smaller 1/2-bedroom units. The policy should be broadened to include a greater range of housing style and layout.

#### Statutory Consultees

2.45 In respect of Policy H04, WBC welcomed clarity as to whether the policy was seeking a different housing mix to that contained within the latest Waverley Housing Affordability Study 2021.

### Other Written Submissions

2.46 No other written submissions were made in respect of Policy H04.

### **Proposed Housing Policy Changes**

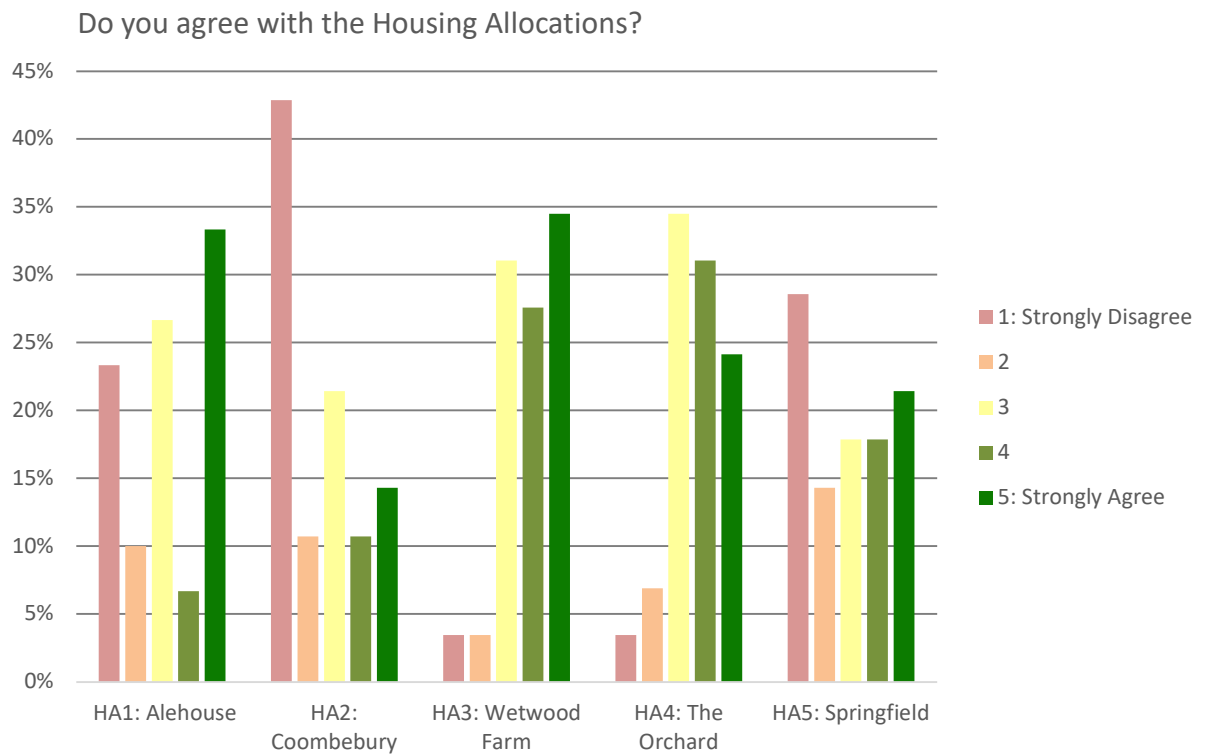
2.47 The changes made as a result of the consultation are summarised below:

Plan Element	Summary of Change Made
Introduction text	<ul style="list-style-type: none"> <li>Amendments to the introductory text have been made where required to reflect updated information and typographical errors.</li> </ul>
Policy HO1: Provision of Housing	<ul style="list-style-type: none"> <li>The policy wording has been updated to reflect that the policy will deliver a minimum number of homes.</li> <li>Completions and deliverable sites numbers have been updated to reflect new planning permissions.</li> <li>HA4: The Orchard has been removed from this policy as planning permission for two dwellings has now been granted and there is no longer a need to include it within the Plan.</li> </ul>
Policy HO2: Self-Build Homes / Custom Build Houses	<ul style="list-style-type: none"> <li>The title of the policy has been amended to include reference to custom build houses.</li> <li>The policy wording has been amended to refer to this type of development being allowed within the settlement boundaries.</li> <li>The supporting text to this policy has been amended to reflect the above changes.</li> </ul>

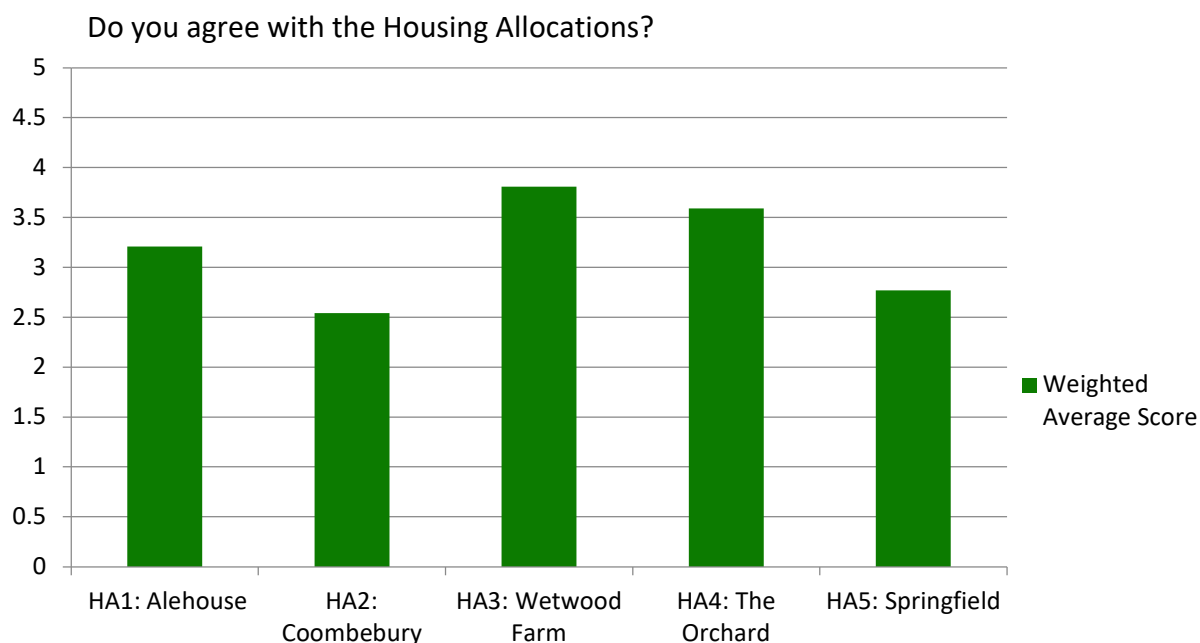


Policy HO3: Windfall Sites	<ul style="list-style-type: none"> <li>Amendments have been made to the policy wording to reflect the need for windfall sites to comply with paragraph 80 of the NPPF and reference made to the settlement boundary. Regard has been had to the corresponding policy within the Made Chiddingfold Neighbourhood Plan.</li> </ul>
Policy HO4: Mix of Housing Size	<ul style="list-style-type: none"> <li>The policy wording and supporting text have been amended to reflect that new developments should reflect the Dunsfold Housing Needs Assessment (or any subsequent assessment). This reflects the local housing mix and need.</li> </ul>

2.48 Question 4 sought views on the extent to which people agreed the five housing allocations (HA1 to HA5). Questionnaire results in response to the question **“Do you agree with the following Housing Allocations?”** are summarised below:







### Policy HA1: Alehouse

#### Consultation Questionnaire

- 2.49 40% of 30 respondents stated they either agreed (7%) or strongly agreed (33%) with Policy HA1: Alehouse. 33% of respondents stated they either disagreed (10%) or strongly disagreed (23%) with the policy. The remaining 27% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy HA1 was 3.2 out of 5, which confirms overall broad agreement with the policy.
- 2.50 The written comments provided in relation to Policy HA1 included:
- (a) The site is an appropriate and discrete location that could comfortably take more houses.
  - (b) The site has long been seen as an ideal central and convenient location for retirement housing for local people and could comfortably take six or seven units.
  - (c) The site is inconsistent with the village's aspiration to be included in the AONB, owing to significant heritage assets.
  - (d) Question why other sites could not accommodate housing for elderly residents.
  - (e) Clarity sought over whether the site is deliverable due to the low level of house allocated to the site.

#### Statutory Consultees

- 2.51 Natural England outlined that any proposed site allocations within, or in proximity of the Surrey Hills AONB will need to consider impacts upon this designation.
- 2.52 Historic England does not object to the proposed allocation, it would welcome the policy wording to be strengthened to make it clear what mitigation measures are required to make development at that location acceptable. The site being within a Conservation Area and close proximity to Listed Buildings



would indicate that more explicit mitigation measures are required than currently done in allocation HA1. The following additional policy wording is recommended:

*“Development proposals will need to demonstrate how the proposed development will preserve or enhance the conservation area, and avoid or minimise harm to the significance of the listed buildings nearby.”*

- 2.53 Historic England suggested adding the need for applicants to refer to Policy ES09 on Areas of Strategic Visual Importance in the text supporting policy HA1.
- 2.54 Surrey County Council did not have any specific comments regarding the proposed site. However, 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.
- 2.55 WBC raised concerned that the policy lacks detail and does not currently recognise key constraints of the site e.g., potential impact on heritage assets. Given the site is located within the Conservation Area and surrounded by Listed Buildings, WBC recommended 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.
- 2.56 WBC also suggested that:
  - (a) Evidence should be provided as to why the site is specifically allocated for retirement dwellings.
  - (b) The Policy itself should be clear that the allocation is for C3 dwellings.
  - (c) Clarity is provided over whether the reference to a lower density of housing being necessary, in paragraph 5.24, give doubt to the achievability of four dwellings on this site.
  - (d) 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.

#### Other Written Submissions

- 2.57 Written submissions from local residents raised the following key points:
  - (a) The site was dismissed as being suitable by WBC due to being in the Conservation Area, outside of the settlement boundary and surrounded by six Listed Buildings.
  - (b) Some questioned the site assessment principles for assessing and selecting site allocations.
  - (c) The allocation for only four dwellings appears at odds with the developer’s aspiration to achieve 11 town houses. Clarification is needed as to whether an allocation of four dwellings likely to be delivered by the developer.
- 2.58 Pearce Planning on behalf of Cognatum Estates who control the Alehouse site strongly support the proposed allocation HA1: Alehouse and the intention that any dwellings on the site should be restricted to residents aged 55+. However, although Cognatum would support four dwellings, Pearce Planning’s submission outlines that to make the site more attractive to residents by reducing service charges per dwellings and creating a stronger community, it would be better to have more homes. Allocating the site for 10 dwellings would be preferable.



## **Policy HA2: Coombebury**

### Consultation Questionnaire

- 2.59 25% of 28 respondents stated they either agreed (11%) or strongly agreed (14%) with Policy HA2: Coombebury. 54% of respondents stated they either disagreed (11%) or strongly disagreed (43%) with the policy. The remaining 21% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy HA2 was 2.4 out of 5, which confirms overall broad disagreement with the policy.
- 2.60 The written comments provided in relation to Policy HA2 included:
- (a) The site is an appropriate and discrete location that could comfortably take more houses.
  - (b) Concern over loss of natural habitat, green space and the allocation represents infill development.
  - (c) Questions the sites allocation given the past development proposals on the sites have been rejected by the Parish Council and WBC.
  - (d) Development at this location presents a material risk of attempts for additional linear development up the Dunsfold Common Road.

### Statutory Consultees

- 2.61 Natural England outlined that any proposed site allocations within, or in proximity of the Surrey Hills AONB will need to consider impacts upon this designation.
- 2.62 Historic England suggested liaising with the local archaeological adviser and Historic Environment Record, if this has not been done already. 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.
- 2.63 Surrey County Council did not have any specific comments regarding the proposed site. However, 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.
- 2.64 WBC stated that it considered the site is a suitable proposed allocation. However, WBC questioned the extent to which 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.

### Other Written Submissions

- 2.65 Written submissions for local residents raised the following key points:
- (a) The site was dismissed as being suitable by WBC and should be removed as an allocation within the Neighbourhood Plan.
  - (b) Some questioned the site assessment principles for assessing and selecting site allocations.

## **Policy HA3: Wetwood Farm**

### Consultation Questionnaire

- 2.66 62% of 29 respondents stated they either agreed (28%) or strongly agreed (34%) with Policy HA3: Wetwood Farm. 7% of respondents stated they either disagreed (3%) or strongly disagreed (3%) with the policy. The remaining 31% of respondents stated they neither agreed nor disagreed with the policy.



The weighted average score for Policy HA3 was 3.9 out of 5, which confirms overall broad agreement with the policy.

2.67 The written comments provided in relation to Policy HA3 included:

- (a) The allocation should take into consideration the developer's promotion of a higher number of dwellings on the site.
- (b) The site is considered remote from the village.
- (c) Questions the site's allocation given the past development proposals on the sites have been rejected by the Parish Council and WBC.

Statutory Consultees

- 2.68 Natural England outlined that any proposed site allocations within, or in proximity of the Surrey Hills AONB will need to consider impacts upon this designation.
- 2.69 Historic England suggested liaising with the local archaeological adviser and Historic Environment Record if this has not been done already.
- 2.70 Surrey County Council did not have any specific comments regarding the proposed site. However, 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.
- 2.71 WBC questioned the extent to which the allocation 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 previously developed land, and it is arguable that this site is not well related to the existing settlement. If the site is greenfield/agricultural, in policy terms, it will be difficult to justify new housing on the site.
- 2.72 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. WBC suggested further consideration on the suitability of this site is undertaken, referring to consider paragraph 79 NPPF.

Other Written Submissions

- 2.73 Written submissions from local residents raised the following key points:
  - (a) The site assessment principles are not fit for purpose for assessing and selecting site allocations.
  - (b) As a disused chicken farm, the site urgently needs to be redeveloped. A development of 12 dwellings would have little impact on the village centre or the AONB and the final density would be below 15dph.
- 2.74 Andrew Black Consulting (ABC), on behalf of Wetwood Farm landowner and developer, confirmed support for the Neighbourhood Plan and for the allocation of the Wetwood Farm site. However, the RAG assessment should be revisited in respect of items S1 and S9, which ABC consider should be 'green' outcomes.



### **Policy HA4: The Orchard**

#### Consultation Questionnaire

- 2.75 55% of 29 respondents stated they either agreed (31%) or strongly agreed (24%) with Policy HA4: The Orchard. 10% of respondents stated they either disagreed (7%) or strongly disagreed (3%) with the policy. The remaining 34% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy HA4 was 3.7 out of 5, which confirms overall broad agreement with the policy.
- 2.76 The written comments provided in relation to Policy HA4 included:
- (a) The allocation should take into account the decrease housing numbers proposed by the owner / developer – this being a single dwelling.
  - (b) The allocation should be reduced to one dwelling.

#### Statutory Consultees

- 2.77 Natural England outlined that any proposed site allocations within, or in proximity of the Surrey Hills AONB will need to consider impacts upon this designation.
- 2.78 Historic England suggested liaising with the local archaeological adviser and Historic Environment Record, if this has not been done already.
- 2.79 Surrey County Council did not have any specific comments regarding the proposed site. However, 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.
- 2.80 WBC stated that any loss of employment use on the site would need to comply with Policy EE2: Protecting Existing Employment Sites in Local Plan Part 1.

#### Other Written Submissions

- 2.81 Written submissions from local residents raised the following key issues:
- (a) The site assessment principles are not fit for purpose for assessing and selecting site allocations.
  - (b) The site owner only wants to build 1 dwelling for himself so the allocation for two dwellings is questionable.

### **Policy HA5: Springfield**

#### Consultation Questionnaire

- 2.82 39% of 28 respondents stated they either agreed (18%) or strongly agreed (21%) with Policy HA5: Springfield. 43% of respondents stated they either disagreed (14%) or strongly disagreed (29%) with the policy. The remaining 18% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy HA5 was 2.9 out of 5, which confirms overall broad agreement with the policy.
- 2.83 The written comments provided in relation to Policy HA5 included:
- (a) The allocation contradicts the site assessments undertaken by AECOM and WBC. The site assessment should be revisited.



- (b) The quantum of development on the allocation should be increased. The quantum of development to the other proposed allocations should be reduced or the allocations removed entirely from the Neighbourhood Plan.
- (c) The robustness of site assessment outcomes for the site are questioned.
- (d) The site has a prominent location on the approach to the village. A large allocation is such a location is not appropriate for Dunsfold.
- (e) Concern over traffic generation from the site along Alfold Road.
- (f) Question over the extent to which wastewater can be adequately managed.
- (g) The scale of development proposal on the Springfield site too great – development should be limited to seven dwellings.

Statutory Consultees

- 2.84 Natural England outlined that any proposed site allocations within, or in proximity of the Surrey Hills AONB will need to consider impacts upon this designation.
- 2.85 Historic England suggested liaising with the local archaeological adviser and Historic Environment Record if this has not been done already.
- 2.86 Historic England outlined that 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.
- 2.87 Surrey County Council did not have any specific comments regarding the proposed site. However, 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.
- 2.88 WBC stated that it considers the site as a suitable proposed allocation. However, questioned the extent to which the proposed allocation of 10 dwellings is consistent with paragraph 125 of the NPPF, in particular relation to the 'efficient use of land'. It may be that the Neighbourhood Plan wishes to express the allocation as an 'at least' figure.

Other Written Submissions

- 2.89 Written submissions from local residents raised the following key issues:
  - (a) There should be no further development north of Grattons Chase. This would divide the village into two.
  - (b) The restriction to 10 dwellings on the site is not justifiable without further justification. The site should accommodate all of the dwellings required over the plan period. The other allocations should be deleted.
  - (c) Some questioned the site assessment principles for assessing and selecting site allocations.
  - (d) If the site is allocated the policy should also require a landscaped edge to the north-west boundary with a gap of at least 20m between the outer perimeter of the development and the boundary of the adjoining properties.



### Housing Omission Sites

- 2.90 A written submission provided by Willow Tree Homes advocates the allocation of the High Billingshurst Farm sites (Site 1 and Site 2).

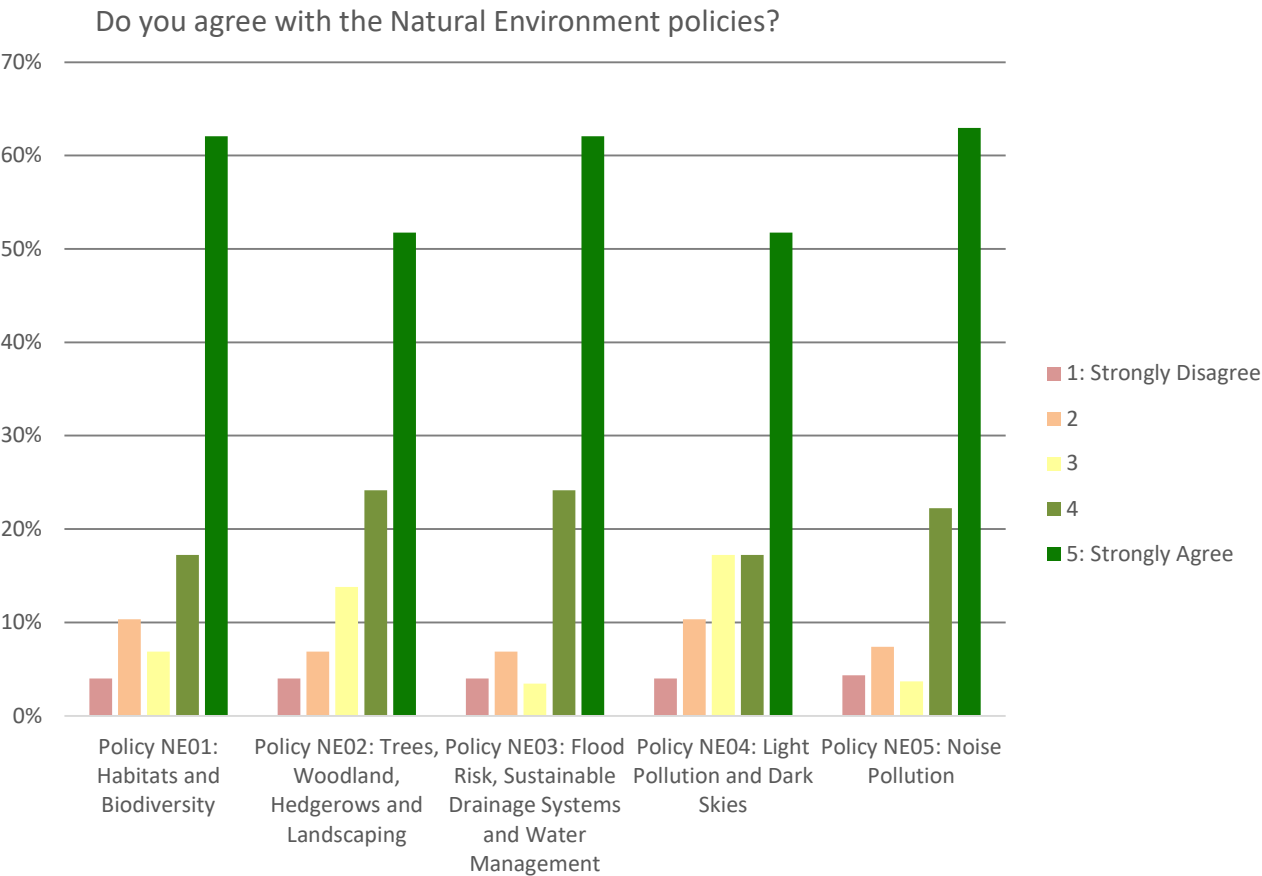
### Proposed Housing Allocation Policy Changes

- 2.91 The changes made as a result of the consultation are summarised below:

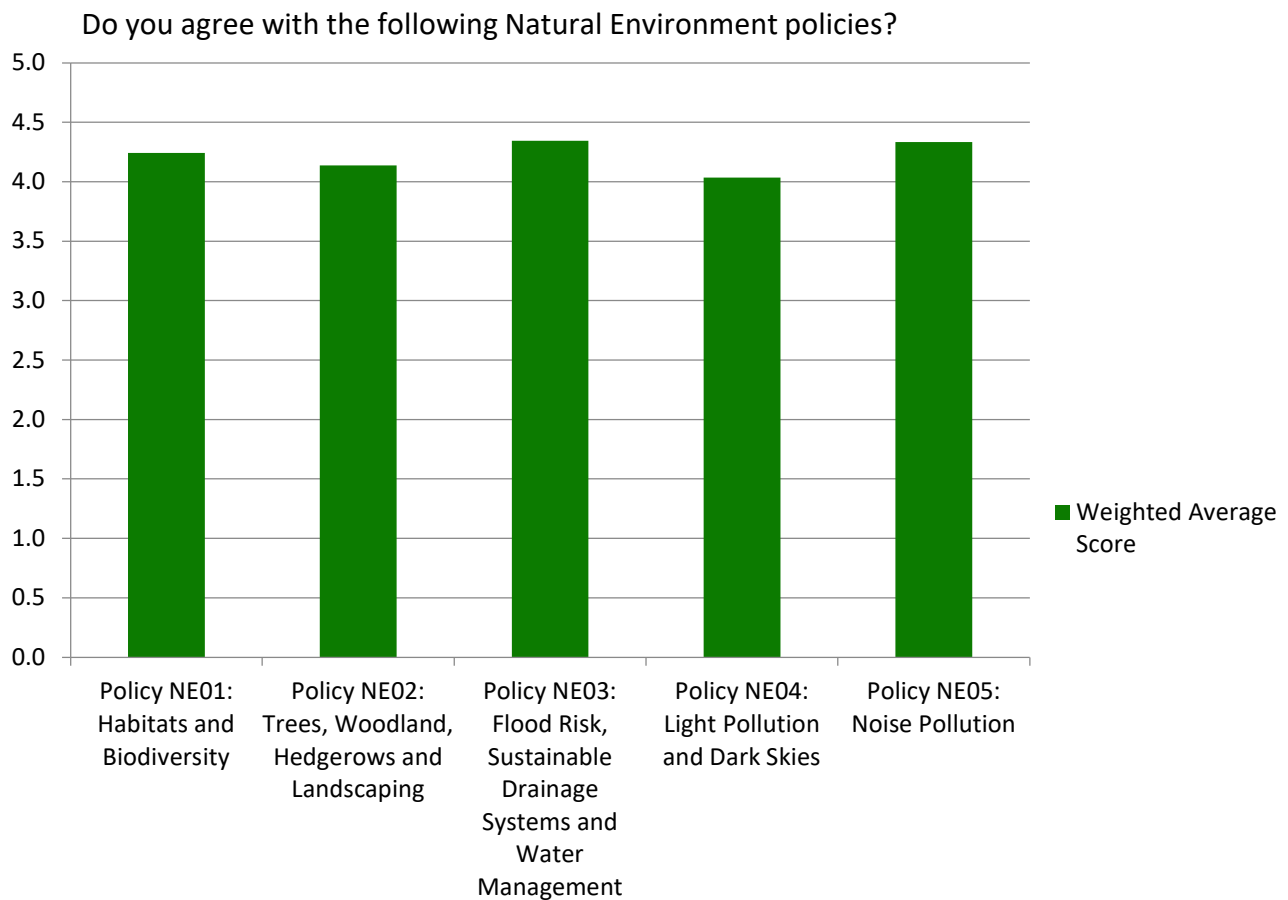
Plan Element	Summary of Change Made
Policy HA1: Alehouse	<ul style="list-style-type: none"> <li>Amendments have been made to reference that these dwellings will be Use Class C3.</li> <li>Additional text has been added to the policy to refer to the Surrey Hills AONB, the need to consider the conservation area and listed buildings, and to Policy ES08.</li> <li>Wording relating to density has been removed from the supporting text and has been amended and added to the policy wording to note that the proposals should be of a density appropriate for older residents.</li> <li>In addition, the supporting text now sets out a clear justification for the need to provide housing for older residents.</li> </ul>
Policy HA2: Coombebury	<ul style="list-style-type: none"> <li>The policy wording has been amended to refer to the allocation to be for "approximately" 12 dwellings.</li> <li>Additional text has been added to the policy to refer to the Surrey Hills AONB, and for the need to consider the conservation area and listed building.</li> <li>Consideration has also been had to the recently dismissed appeal (LPA ref. WA/2021/0413) within the supporting text, noting the concerns relating to landscape. In addition, a provision within the policy wording has been included to ensure that proposals protect the landscape and provide an appropriate transition to the countryside.</li> </ul>
Policy HA3: Wetwood Farm	<ul style="list-style-type: none"> <li>The policy wording has been amended to refer to the allocation to be for "approximately" 7 dwellings.</li> <li>Additional text has been added to the policy to refer to the Surrey Hills AONB, and the for the need to consider the presence of the ancient woodland.</li> </ul>
Policy HA4: The Orchard	<ul style="list-style-type: none"> <li>Permission has now been granted for two dwellings and therefore it is no longer considered necessary to include this as an allocation within the Neighbourhood Plan. Therefore, this allocation has now been removed.</li> </ul>
Policy HA5: Springfield	<ul style="list-style-type: none"> <li>Due to the allocation at The Orchard now being removed from the Plan, this allocation has been renumbered as HA4 for clarity.</li> <li>The policy wording has been amended to refer to the allocation to be for "approximately" 10 dwellings.</li> <li>Additional text has been added to the policy to refer to the Surrey Hills AONB, the need to consider the listed building.</li> </ul>

### Chapter 6: Natural Environment

- 2.92 Question 5 sought views on the extent to which people agreed the five Natural Environment policies (NE01 to NE05). Questionnaire results in response to the question **"Do you agree with the following Natural Environment Policies?"** are summarised below:







### Policy NE01: Habitats and Biodiversity

#### Consultation Questionnaire

- 2.93 79% of 29 respondents stated they either agreed (17%) or strongly agreed (62%) with Policy NE01: Habitats and Biodiversity. 14% of respondents stated they either disagreed (7%) or strongly disagreed (3%) with the policy. The remaining 7% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy NE01 was 4.2 out of 5, which confirms overall broad agreement with the policy.
- 2.94 The written comments provided in relation to Policy NE01 included:
- (a) The policy should be broadened to include owls, badgers, amphibians and deer. Too much emphasis is currently placed on bats.
  - (b) The policy needs to be strengthened. Compensation for significant harms should not be accepted. Development resulting in significant harm should be prevented altogether.
  - (c) Clarity over what are the existing habitat networks and wildlife corridors on the Parish.
  - (d) The policy should state 'significant preference from natural boundaries and not fences / high kerbstones.
  - (e) The policy should be reworded to positively support development proposal that meet all of points (a) to (d).



### Statutory Consultees

2.95 The Surrey Wildlife Trust highlighted that 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 Surrey.

2.96 Surrey Wildlife Trust recommended the following policy wording changes:

*"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.*

2.97 WBC outlined that first part paragraph of the policy as currently worded is not consistent with paragraph 180a) of the NPPF. Para 180a) sets out that where significant harm to biodiversity cannot be avoided, mitigated or compensated for, then planning permission should be refused.

2.98 WBC also sought clarity over the whether it is the intention of the 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?

### Other Written Submissions

2.99 No other written submissions were received in respect of Policy NE01.

## **Policy NE02: Trees, Woodland, Hedgerows and Landscaping**

### Consultation Questionnaire

2.100 76% of 29 respondents stated they either agreed (24%) or strongly agreed (52%) with Policy NE02: Trees, Woodland, Hedgerows and Landscaping. 10% of respondents stated they either disagreed (7%) or strongly disagreed (3%) with the policy. The remaining 14% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy NE02 was 4.1 out of 5, which confirms overall broad agreement with the policy.

2.101 The written comments provided in relation to Policy NE02 included:

- (a) Concern that the policy allows for compensation over significant harm yet says that any detrimental impact on landscape character will not be permitted.
- (b) The policy should also require new development to 'respect and where appropriate enhance the distinctive character of the landscape in which it is located'.



### Statutory Consultees

- 2.102 The Surrey Wildlife Trust outlined that 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 it would advise that long-term management is defined in this context reflects this. The policy also states where possible, new landscaping should comprise native species. It recommends the policy wording be amended to *“...native species or locally appropriate climate change-resilient species preferred”*.
- 2.103 The Surrey Wildlife Trust would 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
- 2.104 WBC sought clarity over the following elements:
- (a) the justification for the policy appearing to go beyond NPPF, LPP1 and LPP2 policies on trees, woodland, hedgerows and landscaping. The following word changes were recommended:  
*“Where appropriate, development of any site within Dunsfold should respect the rural nature of the village and:...”*
  - (b) the justification for garden space to be in excess of the minimum sizes being proposed within the recently adopted LPP2.
  - (c) Clarity over what type of development proposals the final paragraph applies to.

- 2.105 WBC recommended the following word changes to the final paragraph of the policy:

*“...possible appropriate, should comprise native species” to reflect that native species may not always be the most appropriate solution.*

### Other Written Submissions

- 2.106 No other written submissions were received in respect of Policy NE02.

## **Policy NE03: Flood Risk, Sustainable Drainage Systems and Water Management**

### Consultation Questionnaire

- 2.107 86% of 29 respondents stated they either agreed (24%) or strongly agreed (62%) with Policy NE03: Flood Risk, Sustainable Drainage Systems and Water Management. 10% of respondents stated they either disagreed (7%) or strongly disagreed (3%) with the policy. The remaining 3% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy NE03 was 4.3 out of 5, which confirms overall broad agreement with the policy.
- 2.108 The written comments provided in relation to Policy NE03 included:
- (a) Clarity welcomed over what ‘more vulnerable use class’ means in practice.
  - (b) Development proposals should be afforded additional support where sustainable drainage features are incorporated into the scheme and integrated with building and landscaping to promote innovative design.

### Statutory Consultees

- 2.109 Surrey County Council recommended the following policy wording to provide greater alignment with national policy:



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.

2.110 SCC also recommend the following word changes to paragraph 6.14 of the supporting text:

*"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.*

2.111 WBC sought clarity as to whether 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?

#### Other Written Submissions

2.112 Written submissions for local residents included the following key issue:

- (a) There is an ongoing problem with water – Thames Water are regularly in the village.

#### **Policy NE04: Light Pollution and dark Skies**

##### Consultation Questionnaire

2.113 69% of 29 respondents stated they either agreed (17%) or strongly agreed (52%) with Policy NE04: Light Pollution and dark Skies. 14% of respondents stated they either disagreed (10%) or strongly disagreed (3%) with the policy. The remaining 17% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy NE04 was 4.0 out of 5, which confirms overall broad agreement with the policy.

2.114 The written comments provided in relation to Policy NE04 included:

- (a) Dunsfold lies in an area of very low light pollution – this should be recognised as a valuable characteristic and be preserved.
- (b) To strengthen the policy some of the supporting text needs to be incorporated within policy wording.
- (c) The second paragraph should be amended to refer to 'significant' light polluting impacts as all new development could otherwise be prevented by this policy.



### Statutory Consultees

- 2.115 WBC suggested that the wording of the policy should clarify whether it refers to just outdoor lighting or indoor lighting as well and questioned how officers would assess and apply the policy.
- 2.116 WBC sought clarity as to whether 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?

### Other Written Submissions

- 2.117 No other written submissions were received in respect of Policy NE04.

## **Policy NE05: Noise Pollution**

### Consultation Questionnaire

- 2.118 85% of 27 respondents stated they either agreed (22%) or strongly agreed (63%) with Policy NE05: Noise Pollution. 11% of respondents stated they either disagreed (7%) or strongly disagreed (4%) with the policy. The remaining 22% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy NE05 was 4.3 out of 5, which confirms overall broad agreement with the policy.
- 2.119 The written comments provided in relation to Policy NE05 included:
- (a) Clarity welcomed over how development can reduce noise in practice.

### Statutory Consultees

- 2.120 WBC questioned the requirement of this Policy, specifically as to what is defined as an 'adverse noise impact'.
- 2.121 WBC also outlined that it is of the view that construction hours is more appropriately considered when assessing a planning application, and if appropriate, apply a condition on a case-by-case basis.
- 2.122 WBC considered that supporting text paragraph 6.19 appears to set out that certain types of development will be supported (noise reducing measures). In view of this it is recommended that this support would be better set out within policy rather than in supporting text.

### Other Written Submissions

- 2.123 No other written submissions were received in respect of Policy NE05.

## **Proposed Natural Environment Policy Changes**

- 2.124 The changes made as a result of the consultation are summarised below:

Plan Element	Summary of Changes Made
Overview supporting text	<ul style="list-style-type: none"> <li>Minor amendments to the text have been made to make reference to the AONB expansion not being confirmed at this stage.</li> </ul>
Policy NE01: Habitats and Biodiversity	<ul style="list-style-type: none"> <li>The wording of (b) has been amended to refer to habitats rather than features in line with Surrey Wildlife Trust's comments.</li> <li>Reference has been included to the 10% biodiversity net gain requirement in the Environment Act 2021 which will come into force in November 2023. There is no evidence to justify the higher 20% target proposed by Surrey Wildlife Trust.</li> </ul>



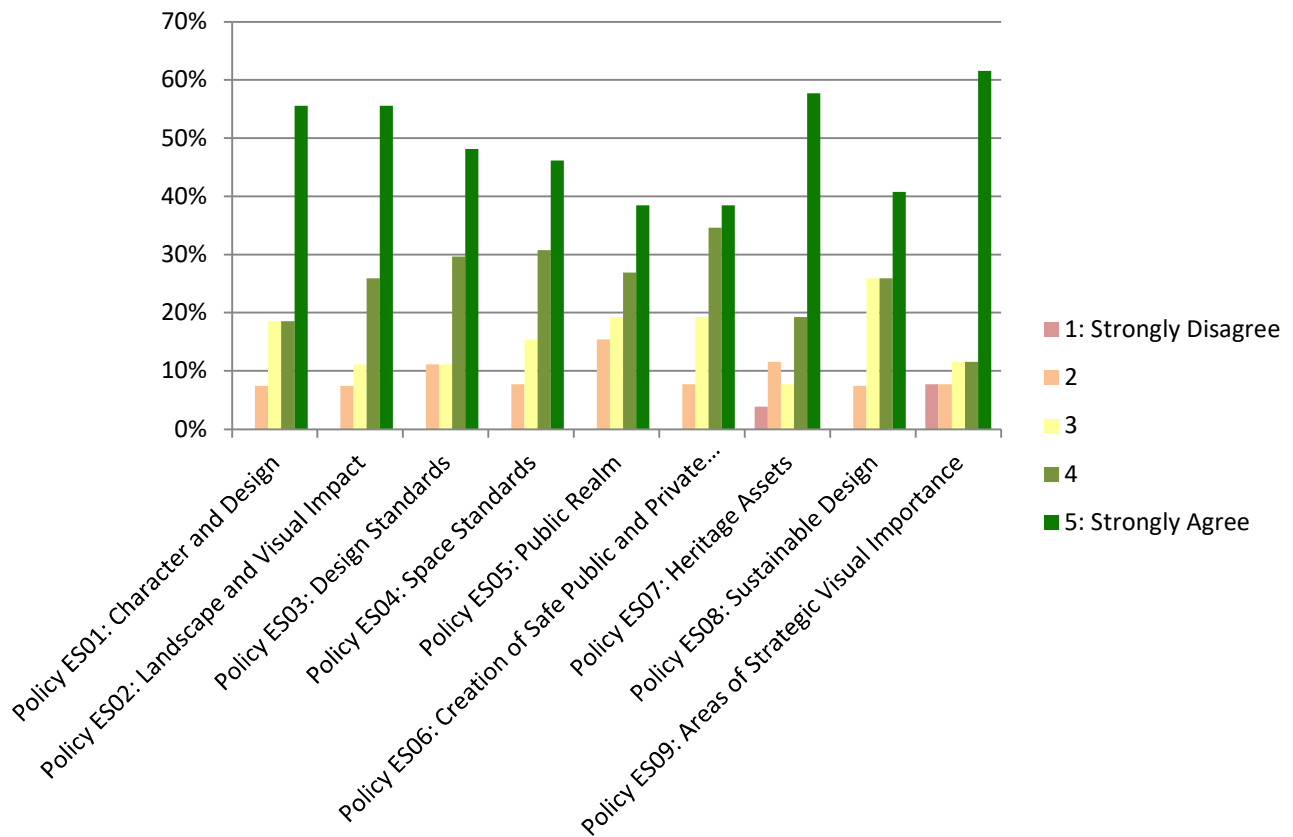
Policy NE02: Trees, Woodland, Hedgerows and Landscaping	<ul style="list-style-type: none"> <li>The policy wording has been amended to incorporate Surrey Wildlife Trust's and WBC's comments where appropriate.</li> <li>Reference has been made to the Environment Act 2021 in relation to the long-term management of development proposals. The Surrey Wildlife Trust's request to include reference to "climate change-resilient species" being preferred has not been taken forward as it is not justified or consistent with local or national policy.</li> <li>Additional wording has been added to the required garden sizes to make it clear that gardens should reflect the character of the area in size and boundary treatments.</li> </ul>
Policy NE3: Flood Risk, Sustainable Drainage Systems and Water Management	<ul style="list-style-type: none"> <li>The policy wording and supporting text has been amended to take account of Surrey County Council's comments.</li> </ul>
Policy NE04: Light Pollution and Dark Skies	<ul style="list-style-type: none"> <li>The wording of the policy has been amended to refer to "unacceptable" light pollution. Consideration has been had to the wording of the Made Chiddingfold Neighbourhood Plan, and the amendments reflect this.</li> <li>It is confirmed that this policy relates to all development proposals as light pollution can occur in development other than proposals for new dwellings.</li> </ul>
Policy NE05: Noise Pollution	<ul style="list-style-type: none"> <li>Regard has been had to the corresponding policy within the Made Chiddingfold Neighbourhood Plan and the policy has been amended to this effect.</li> <li>Reference to construction hours has been removed in line with WBC's comments.</li> <li>The supporting text has been kept to reflect that noise pollution reducing measures may not just relate to traffic, however the policy wording has been amended to demonstrate that proposals which reduce noise pollution will be supported.</li> </ul>

## **Chapter 7: Environment, Sustainability and Design**

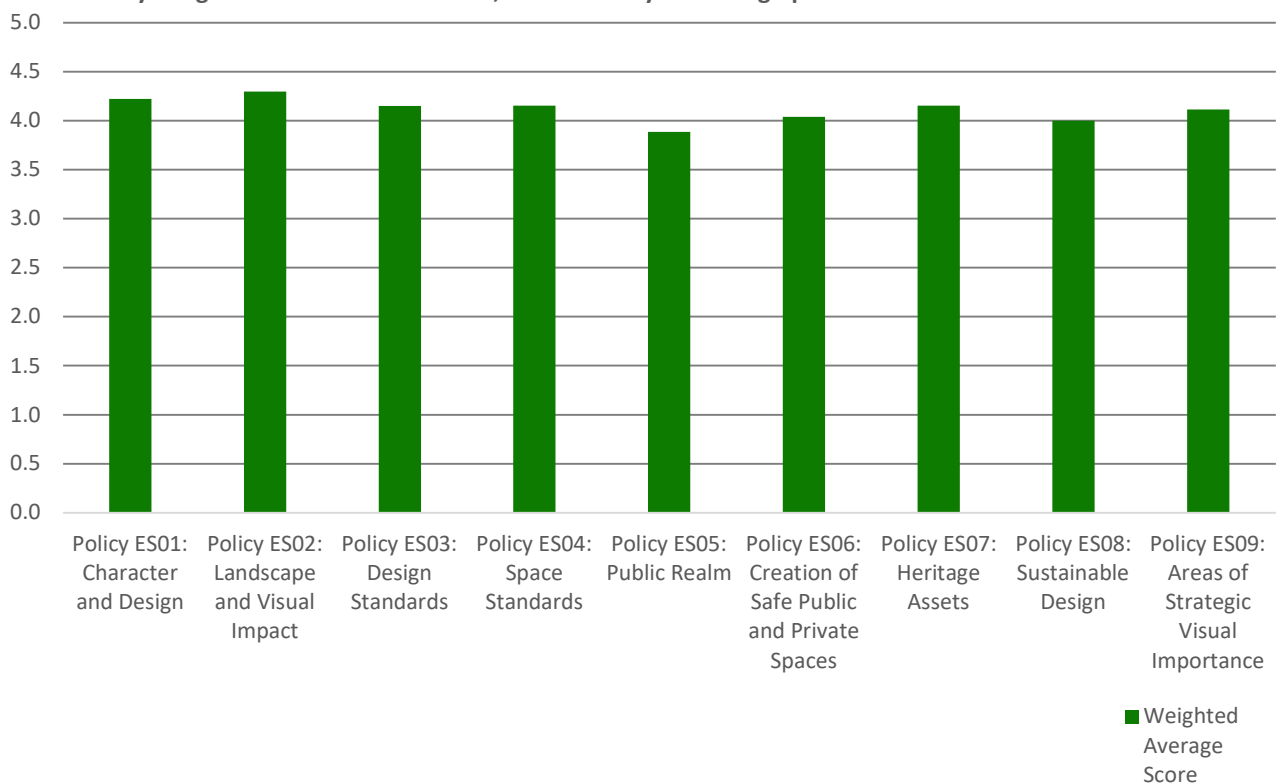
2.125 Question 6 sought views on the extent to which people agreed the nine Environment, Sustainability and Design policies (ES01 to ES02). Questionnaire results in response to the question **"Do you agree with the following Environment, Sustainability and Design Policies?"** are summarised below:



### Do you agree with the Environment, Sustainability and Design policies?



### Do you agree with the Environment, Sustainability and Design policies?





## **Policy ES01: Character and Design**

### Consultation Questionnaire

- 2.126 74% of 27 respondents stated they either agreed (19%) or strongly agreed (56%) with Policy ES01: Character and Design. 7% of respondents stated they disagreed with the policy. The remaining 19% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ES01 was 4.2 out of 5, which confirms overall broad agreement with the policy.
- 2.127 The written comments provided in relation to Policy ES01 included:
- (a) The sentiment of the policy is welcomed, but the requirements of the policy appear vague.
  - (b) Concern that the Village Design Statement is now over 20-years old. Clarity welcomed as to the preparation of new design guidance for the Parish that better reflects the encouragement of innovative and unique approaches to design.

### Statutory Consultees

- 2.128 Historic England suggested the following 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, including but not limited to the local historic environment.'*
- 2.129 WBC outlined that 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.

### Other Written Submissions

- 2.130 No other written submissions were received in respect of Policy ES01.

## **Policy ES02: Landscape and Visual Impact**

### Consultation Questionnaire

- 2.131 81% of 27 respondents stated they either agreed (26%) or strongly agreed (56%) with Policy ES02: Landscape and Visual Impact. 7% of respondents stated they disagreed with the policy. The remaining 11% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ES02 was 4.3 out of 5, which confirms overall broad agreement with the policy.
- 2.132 The written comments provided in relation to Policy ES02 included:
- (a) The visual character of the village should override such things as solar panels on roofs and edgy 'sustainable design'.
  - (b) Clarity welcomed of the meaning of 'on the edge of the village'.
  - (c) Housing densities are not already reduced towards the "edge" of the village, which seems an arbitrary inclusion and increases the number of developments needed to deliver the required housing supply figures.





### Statutory Consultees

- 2.133 WBC outlined that 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.

### Other Written Submissions

- 2.134 No other written submissions were received in respect of Policy ES02.

## **Policy ES03: Design Standards**

### Consultation Questionnaire

- 2.135 78% of 27 respondents stated they either agreed (30%) or strongly agreed (48%) with Policy ES03: Design Standards. 11% of respondents stated they disagreed with the policy. The remaining 11% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ES03 was 4.1 out of 5, which confirms overall broad agreement with the policy.
- 2.136 The written comments provided in relation to Policy ES3 included clarity over when the Design Statement will be reviewed.

### Statutory Consultees

- 2.137 Historic England recommended 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.
- 2.138 Historic England noted that the cross-reference to policy ES07 could give room for Policy ES07 to ensure that impacts on heritage assets are given due consideration and avoid unnecessary repetition. If this change is made, naturally it would impact on the number of the subsequent criteria in this policy.
- 2.139 Historic England outline that signage and lighting are not automatically urbanising features, if designed sensitively. This concern could be addressed by moving the word ‘inappropriate’
- 2.140 Historic England’s suggested policy word changes:

~~b) Protect and enhance the historic~~ Reflect the character of Dunsfold’s Village and hamlets, acknowledging the contribution to that character made by the historic environment (and with reference to policy ES 07).

~~c) Preserve or enhance heritage assets and their settings and any features of special architectural or historic interest they possess.~~

l) Avoid the inappropriate use of urbanising features, such as inappropriate signage and lighting.

- 2.141 Surrey Wildlife Trust recommended that the policy 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 roofs.
- 2.142 Surrey Wildlife Trust outlined that ES3 of chapter 7 makes reference to the creation of green corridors. Cross-referencing to Biodiversity Opportunity Areas (BOAs) may be considered useful and would help link a number of national and local sites.



- 2.143 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. The Trust advises that the Dunsfold Neighbourhood Plan makes reference to the importance of BOAs for the area.
- 2.144 WBC outlined that 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.
- 2.145 With regards to part (j), WBC noted that many of these are permitted development and therefore the neighbourhood plan policy would not be applied to these development types.

Other Written Submissions

- 2.146 No other written submissions were received in respect of Policy ES03.

**Policy ES04: Space Standards**

Consultation Questionnaire

- 2.147 77% of 26 respondents stated they either agreed (31%) or strongly agreed (46%) with Policy ES04: Space Standards. 8% of respondents stated they disagreed with the policy. The remaining 15% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ES04 was 4.2 out of 5, which confirms overall broad agreement with the policy.
- 2.148 No written comments were provided in relation to Policy ES04.

Statutory Consultees

- 2.149 WBC highlighted that the National Space Standards can only be introduced by a Local Plan, as stated in the March 2015 Ministerial Statement. Policy DM5 within the emerging (now adopted) LPP2 covers this policy requirement.

2.150 Other Written Submissions

- 2.151 No written comments were provided in relation to Policy ES05.

**Policy ES05: Public Realm**

Consultation Questionnaire

- 2.152 65% of 26 respondents stated they either agreed (27%) or strongly agreed (38%) with Policy ES05: Public Realm. 15% of respondents stated they disagreed with the policy. The remaining 19% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ES05 was 3.9 out of 5, which confirms overall broad agreement with the policy.
- 2.153 The written comments provided in relation to Policy ES5 included:
- (a) The policy should explicitly refer to policies and guidance for common land.
  - (b) Clarity is welcomed over that ‘larger scale’ development means within the supporting text (paragraph 7.13).

Statutory Consultees

- 2.154 WBC queried whether the policy is required as it repeats aspects of Policy DM6 within the emerging (now adopted) LPP2. Notwithstanding this, WBC recommended the following word changes:



*(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.*

Other Written Submissions

2.155 No written comments were provided in relation to Policy ES06.

**Policy ES06: Creation of Safe Public and Private Spaces**

Consultation Questionnaire

2.156 73% of 26 respondents stated they either agreed (35%) or strongly agreed (38%) with Policy ES06: Creation of Safe Public and Private Spaces. 8% of respondents stated they disagreed with the policy. The remaining 19% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ES06 was 4.0 out of 5, which confirms overall broad agreement with the policy.

2.157 The written comments provided in relation to Policy ES6 included:

- (a) The sentiment of the policy is welcomed, but the requirements of the policy appear vague.
- (b) Clarity welcomed over what 'natural surveillance' and 'defensible space' means in practice.

Statutory Consultees

2.158 WBC suggested that the policy is deleted as it largely repeats DM7 within the recently adopted LPP2. It was also noted that the policy omits part (d) of emerging Policy DM7 which covers appropriate lighting – this is necessary for safer places.

Other Written Submissions

2.159 No written comments were provided in relation to Policy ES07.

**Policy ES07: Heritage Assets**

Consultation Questionnaire

2.160 77% of 26 respondents stated they either agreed (19%) or strongly agreed (58%) with Policy ES07: Heritage Assets. 15% of respondents stated they neither disagreed (12%) nor strongly disagreed (4%) with the policy. The remaining 8% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ES07 was 4.2 out of 5, which confirms overall broad agreement with the policy.

2.161 The written comments provided in relation to Policy ES07 included:

- (a) The policy needs to be strengthened and is inconsistent with the supporting text (paragraph 7.13).
- (b) No development should be permitted if it would cause any (not substantial) detrimental harm to the character, setting or historic nature and use of a heritage asset.

Statutory Consultees

2.162 Historic England outlined that the policy wording should be amended to better reflect national policy to conserve heritage assets in a manner appropriate to their significance. The approach within the current policy appears to combine heritage assets, without modifying the approach to take account of difference grades of asset. This is contrary to national policy.

2.163 Historic England outlined that 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. Specific wording is included in the Appendix. The fact that non-designated heritage assets include 'Buildings of Local Merit' can be picked up in the supporting text.

2.164 Historic England also outlined that the policy does not consider potential impacts on unknown archaeological remains. It suggests liaison with the local archaeological adviser and Historic Environment Record.

2.165 Historic England recommend:

- 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).
- There is no need to add 'Statutory' before 'Listed Buildings'.
- It is good to refer to the Dunsfold Conservation Area Appraisal.

2.166 Historic England suggest the following policy wording changes:

*Development affecting ~~Statutory Listed Buildings, the Dunsfold Conservation Areas, and~~ other designated heritage assets in the Parish and Buildings of Local Merit should preserve or enhance the significance of the assets, including the contribution to that significance made by and their settings, and any features of special architectural or historic interest they possess.*

*For proposed developments that could impact upon the significance of Statutory Listed Buildings, 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.*

*Development should preserve or enhance the character of the Conservation Areas in accordance with the Dunsfold Conservation Area appraisal.*

*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.*

2.167 Surrey County Council suggested that the policy wording is changed to make it clear that non-designated heritage assets are also considerations with the planning process and need to be accorded the appropriate weight when applications are considered. Applicants are advised to consult the Historic Record at Surrey County Council for more information about undesignated heritage assets.

2.168 Surrey County Council also highlighted that any sites allocated for development that are over 0.4ha. in size will be require archaeology assessment in line with the Waverley Local Plan policies.

2.169 WBC suggested that the policy should look to focus on locally specific issues and highlighting and protecting specific local characteristics, such as boundary treatments.

2.170 WBC also outlined that 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. To provide greater clarity, consider changing the wording to:

*'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...'*



Other Written Submissions

2.171 No written comments were provided in relation to Policy ES07.

**Policy ES08: Sustainable Design**

Consultation Questionnaire

2.172 67% of 27 respondents stated they either agreed (26%) or strongly agreed (26%) with Policy ES08: Sustainable Design. 7% of respondents stated they disagreed with the policy. The remaining 26% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ES08 was 4.0 out of 5, which confirms overall broad agreement with the policy.

2.173 The written comments provided in relation to Policy ES8 included:

- (a) The visual character of the village should not override such things as solar panels on roofs and edge 'sustainable' design
- (b) The traditional beauty of the village should be more important than eyesore developments such as solar panels.
- (c) Whilst the policy sentiments are supported, concerned over how much of the policy can be delivered in practice.

Statutory Consultees

2.174 Surrey Wildlife Trust suggested that the Neighbourhood Plan should do more to resist fossil fuels i.e., natural gas within the Neighbourhood Plan Area given its geospatial relevance.

2.175 WBC suggested revising the final paragraph of the policy to take account of the following:

- (a) 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.
- (b) 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.

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 cause irretrievable harm and will often be incompatible with the original construction causing damp etc.

Other Written Submissions

2.176 No written comments were provided in relation to Policy ES08.

**Policy ES09: Areas of Strategic Visual Importance**

Consultation Questionnaire

2.177 73% of 26 respondents stated they either agreed (12%) or strongly agreed (62%) with Policy ES09: Areas of Strategic Visual Importance. 15% of respondents stated they either disagreed (8%) or strongly disagreed (8%) with the policy. The remaining 12% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ES09 was 4.1 out of 5, which confirms overall broad agreement with the policy.



2.178 The written comments provided in relation to Policy ES9 included:

- (a) Suggested that there are additional views of strategic visual importance than those listed in the Policy.
- (b) Clarity welcomed over how the two views selected have been chosen.

#### Statutory Consultees

2.179 Historic England outlined that the policy would benefit from greater clarity and an improved map (if possible).

2.180 Surrey County Council support the inclusion of areas of strategic visual importance.

2.181 WBC outlines that the policy seeks to designate the areas stated as ASVIs but does not set out the policy which would apply to these areas. In view of this, WBC asked if it was 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.

2.182 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 consider 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.

#### Other Written Submissions

2.183 No other written comments were provided in relation to Policy ES09.

### **Proposed Environment, Sustainability and Design Policy Changes**

2.184 The changes made as a result of the consultation are summarised below:

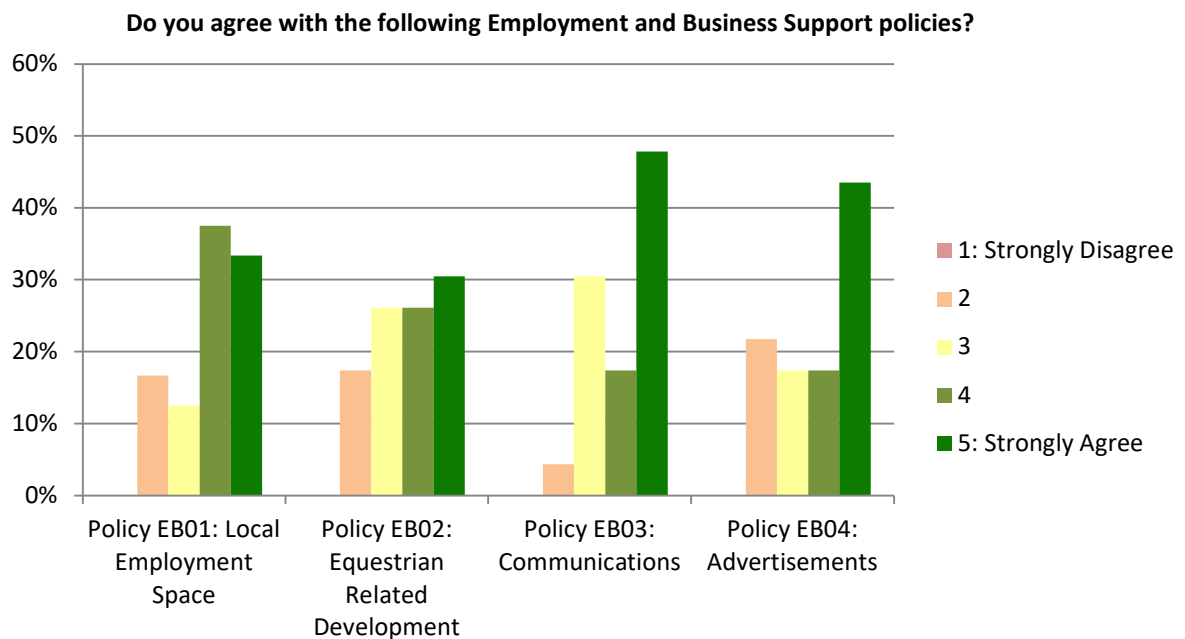
Plan Element	Summary of Changes Made
Policy ES01: Character and Design	<ul style="list-style-type: none"> <li>The amendments proposed by Historic England and WBC have been incorporated into the policy wording.</li> </ul>
Policy ES02: Landscape and Visual Impact	<ul style="list-style-type: none"> <li>The policy has been amended to require proposals to "have regard" to the Dunsfold Village Design Statement principles.</li> </ul>
Policy ES03: Design Standards	<ul style="list-style-type: none"> <li>The policy wording has been amended in line with Historic England's comments.</li> <li>Amendments have also been made in accordance with WBC's comments, including removing reference to garden and other outbuildings which are covered under permitted development.</li> </ul>
Policy ES04: Space Standards	<ul style="list-style-type: none"> <li>Reference to LPP2 Policy DM5 has been made for clarity.</li> </ul>
Policy ES05: Public Realm	<ul style="list-style-type: none"> <li>This policy has been retained as it reflects the wording of the corresponding policy within the Made Chiddingfold Neighbourhood Plan.</li> <li>The word "appropriate" has been included at (c) in line with WBC's comments.</li> </ul>

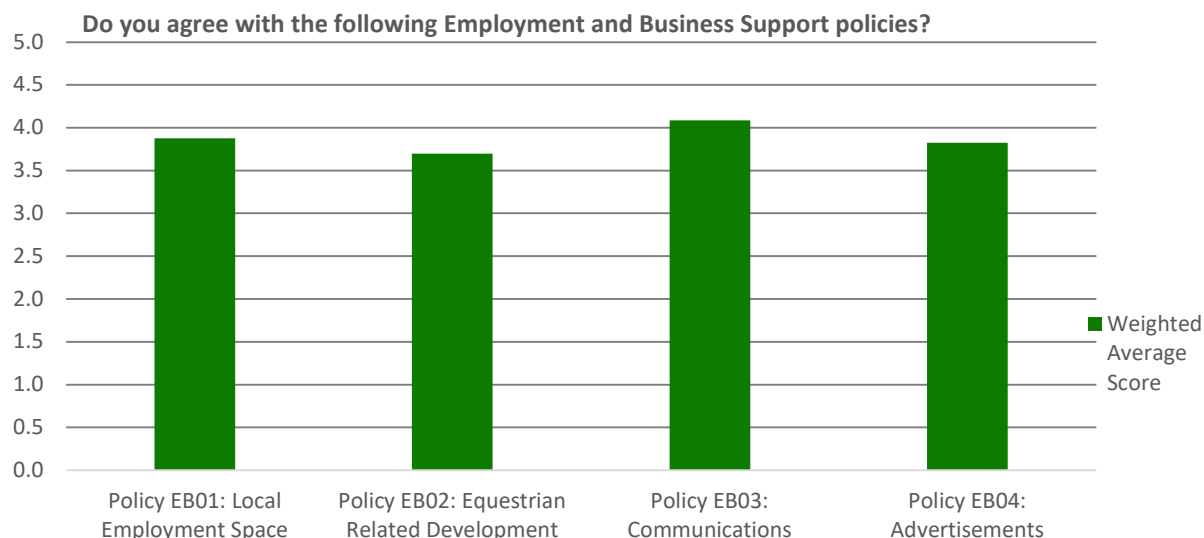


Policy ES06: Creation of Safe Public and Private Spaces	<ul style="list-style-type: none"> <li>This policy has been retained as it reflects the wording of the corresponding policy within the Made Chiddingfold Neighbourhood Plan.</li> </ul>
Policy ES07: Heritage Assets	<ul style="list-style-type: none"> <li>The policy wording has been amended in line with the suggestions made by Historic England.</li> </ul>
Policy ES08: Sustainable Design	<ul style="list-style-type: none"> <li>The policy wording has been amended in line with WBC's comments in relation to Part L of the Building Regulations.</li> <li>The suggestion from the Surrey Wildlife Trust regarding resistance to fossil fuels goes beyond the scope of the Plan and cannot be justified.</li> </ul>
Policy ES09: Areas of Strategic Visual Importance	<ul style="list-style-type: none"> <li>The policy wording has been amended to make reference to the recently adopted LPP2 in line with WBC's comments.</li> </ul>

## Chapter 8: Employment and Business Support

2.185 Question 7 sought views on the extent to which people agreed with the four Employment and Business Support policies (EB01 to EB04). Questionnaire results in response to the question **"Do you agree with the following Employment and Business Support Policies?"** are summarised below:





### Policy EB01: Local Employment Space

#### Consultation Questionnaire

- 2.186 71% of 24 respondents stated they either agreed (38%) or strongly agreed (33%) with Policy EB01: Local Employment Space. 17.5% of respondents stated they disagreed with the policy. The remaining 13% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy EB01 was 3.9 out of 5, which confirms overall broad agreement with the policy.
- 2.187 The qualifying comments provided in relation to Policy EB01 suggested:
- (a) New employment development should be focused at Dunsfold Park.
  - (b) The policy should enhance and protect the existing agricultural and community businesses and their facilities – including ancillary accommodation.
  - (c) Local employment generating development should be supported if it provides sustainability benefits.

#### Statutory Consultees

- 2.188 WBC suggested 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

#### Other Written Submissions

- 2.189 No other written comments were provided in relation to Policy EB01.

### Policy EB02: Equestrian Related Development

#### Consultation Questionnaire

- 2.190 57% of 23 respondents stated they either agreed (26%) or strongly agreed (30%) with Policy EB02: Equestrian Related Development. 17% of respondents stated they disagreed with the policy. The remaining 26% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy EB02 was 3.7 out of 5, which confirms overall broad agreement with the policy.





2.191 The qualifying comments provided in relation to Policy EB02 suggested:

- (a) Clarity needs to be provided over temporary structures in order to ensure they do not become permanent and therefore a potential future development / replacement.

Statutory Consultees

2.192 WBC outlined that where the policy relates to equestrian enterprises, it should be consistent with paragraph 84a) 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"*.

Other Written Submissions

2.193 No other written comments were provided in relation to Policy EB02.

**Policy EB03: Communications**

Consultation Questionnaire

2.194 65% of 23 respondents stated they either agreed (17%) or strongly agreed (48%) with Policy EB03: Communications. 4% of respondents stated they disagreed with the policy. The remaining 30% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy EB03 was 4.1 out of 5, which confirms overall broad agreement with the policy.

2.195 The qualifying comments provided in relation to Policy EB02 suggested:

- (a) The policy needs to balance need to visual / landscape impacts.
- (b) Cables should be underground to future proof against disruption.

Statutory Consultees

2.196 WBC queried 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).

Other Written Submissions

2.197 No other written comments were provided in relation to Policy EB03.

**Policy EB04: Advertisements**

Consultation Questionnaire

2.198 61% of 23 respondents stated they either agreed (17%) or strongly agreed (43%) with Policy EB04: Advertisements. 22% of respondents stated they disagreed with the policy. The remaining 17% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy EB04 was 3.8 out of 5, which confirms overall broad agreement with the policy.

Statutory Consultees

2.199 WBC suggested the following policy wording changes:

*"The Parish of Dunsfold is within an Area of Special Control of Advertisements..."*

2.200 WBC also recommended consideration of the Planning Practice Guidance, in particular:



- (a) What additional considerations may apply when considering applications for sign posting in rural areas?
- (b) 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 signposting can benefit the local economy and reflect this through the decision-making process.
- (c) 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.

#### Other Written Submissions

2.201 No other written comments were provided in relation to Policy EB04.

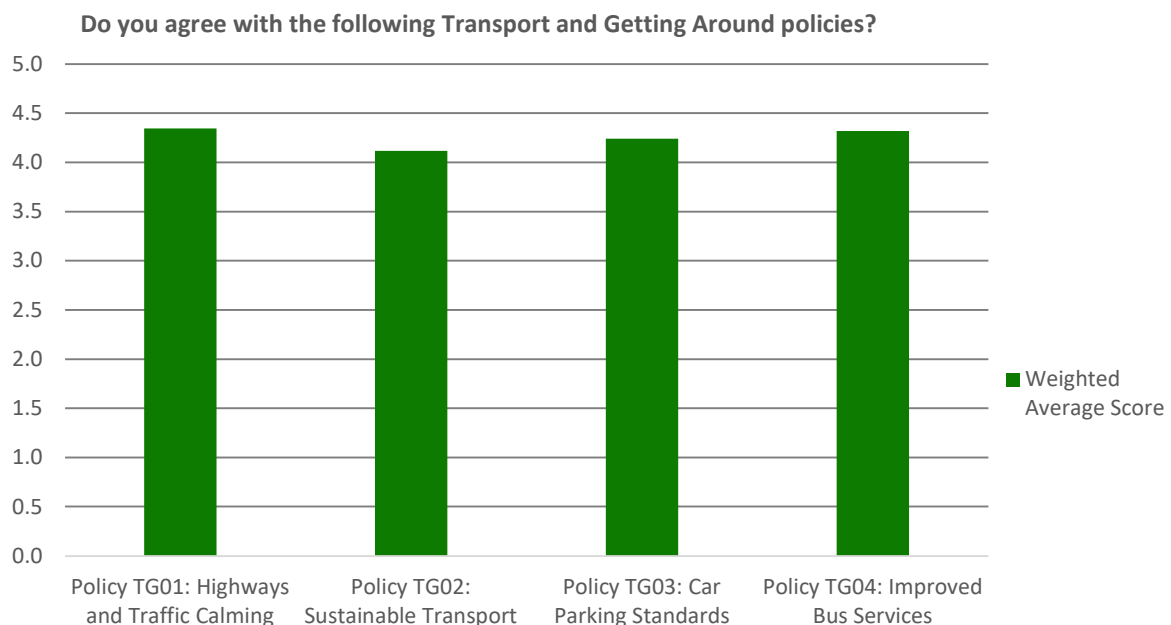
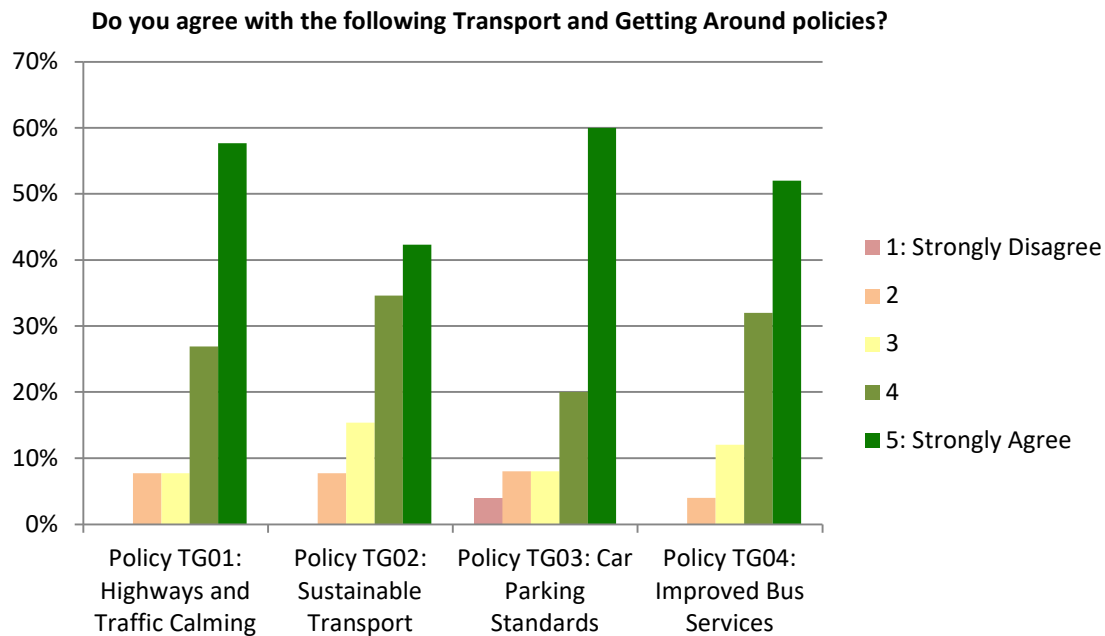
#### **Proposed Employment and Business Support Policy Changes**

2.202 The changes made as a result of the consultation are summarised below:

<b>Plan Element</b>	<b>Summary of Changes Made</b>
Policy EB01: Local Employment Space	<ul style="list-style-type: none"> <li>The rural economy is recognised as important within the NPPF, therefore, the comments made by WBC to change the emphasis of this policy have been incorporated.</li> </ul>
Policy EB02: Equestrian Related Development	<ul style="list-style-type: none"> <li>The policy wording has been amended to provide clarity in respect of the comments made by WBC. The policy is consistent with the wording included within a similar policy the Made Chiddingfold Neighbourhood Plan.</li> </ul>
Policy EB03: Communications	<ul style="list-style-type: none"> <li>This policy has been checked for consistency within the Made Chiddingfold Neighbourhood Plan. The only amendment is a typographical error.</li> </ul>
Policy EB04: Advertisements	<ul style="list-style-type: none"> <li>The wording of the policy has been amended slightly in line with the comments from WBC.</li> </ul>

#### **Chapter 9: Transport and Getting Around**

2.203 Question 8 sought views on the extent to which people agreed the four Transport and Getting Around policies (TG01 to TG04). Questionnaire results in response to the question **"Do you agree with the following Transport and Getting Around policies?"** are summarised below:



### Policy TG01: Highways and Traffic Calming

#### Consultation Questionnaire

2.204 85% of 26 respondents stated they either agreed (27%) or strongly agreed (58%) with Policy TG01: Highways and Traffic Calming. 8% of respondents stated they disagreed with the policy. The remaining 8% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy TG01 was 4.3 out of 5, which confirms overall broad agreement with the policy.

2.205 The written comments provided in relation to Policy TG01 suggested:

- (a) The policy needs to ensure that drivers pass through the village safely



- (b) Expansion of the 40mph speed limit along the Chiddingfold Road is long overdue.
- (c) HGV movements from Chiddingfold need to be stopped.
- (d) Weight restrictions should be introduced for vehicles crossing Loxley Bridge and the two bridges in Pickhurst Lane or White Beech.

Statutory Consultees

- 2.206 In respect of enhancing and providing new footpaths and bridleways, Surrey County Council outlined that it 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.
- 2.207 WBC outlined that 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. The final section of the Policy appears very similar to that proposed within TG02.

Other Written Submissions

- 2.208 No other written comments were provided in relation to Policy TG1.

**Policy TG02: Sustainable Transport**

Consultation Questionnaire

- 2.209 77% of 26 respondents stated they either agreed (35%) or strongly agreed (42%) with Policy TG02: Sustainable Transport. 8% of respondents stated they disagreed with the policy. The remaining 15% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy TG01 was 4.1 out of 5, which confirms overall broad agreement with the policy.
- 2.210 The written comments provided in relation to Policy TG02 principally supported the policy. No changes to the policy were put forward.

Statutory Consultees

- 2.211 No written comments were provided in relation to Policy TG2.

Other Written Submissions

- 2.212 No other written comments were provided in relation to Policy TG2.

**Policy TG03: Car Parking Standards**

Consultation Questionnaire

- 2.213 80% of 25 respondents stated they either agreed (20%) or strongly agreed (60%) with Policy TG03: Car Parking Standards. 12% of respondents stated they either disagreed (8%) or strongly disagreed (4%) with the policy. The remaining 8% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy TG03 was 4.2 out of 5, which confirms overall broad agreement with the policy.
- 2.214 The written comments provided in relation to Policy TG03 supported the policy but requested that sufficient car parking spaces are provided.



### Statutory Consultees

2.215 WBC outlined that the policy as drafted does not provide 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, WBC suggested referring to existing car parking standards. It suggested reviewing the Chiddingfold Neighbourhood Plan. WBC also noted that Building Regulations Part S bring into force new requirements regarding electric vehicle charging.

### Other Written Submissions

2.216 No other written comments were provided in relation to Policy TG3.

## **Policy TG04: Improved Bus Services**

### Consultation Questionnaire

2.217 84% of 25 respondents stated they either agreed (32%) or strongly agreed (52%) with Policy TG04: Improved Bus Services. 4% of respondents stated they disagreed with the policy. The remaining 12% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy TG04 was 4.3 out of 5, which confirms overall broad agreement with the policy.

2.218 The written comments provided in relation to Policy TG04 supported the policy but questioned if an improved bus service was sustainable financially due to low patronage levels.

### Statutory Consultees

2.219 WBC outlined that 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

### Other Written Submissions

2.220 No other written comments were provided in relation to Policy TG4.

## **Proposed Transport and Getting Around Policy Changes**

2.221 The changes made as a result of the consultation are summarised below:

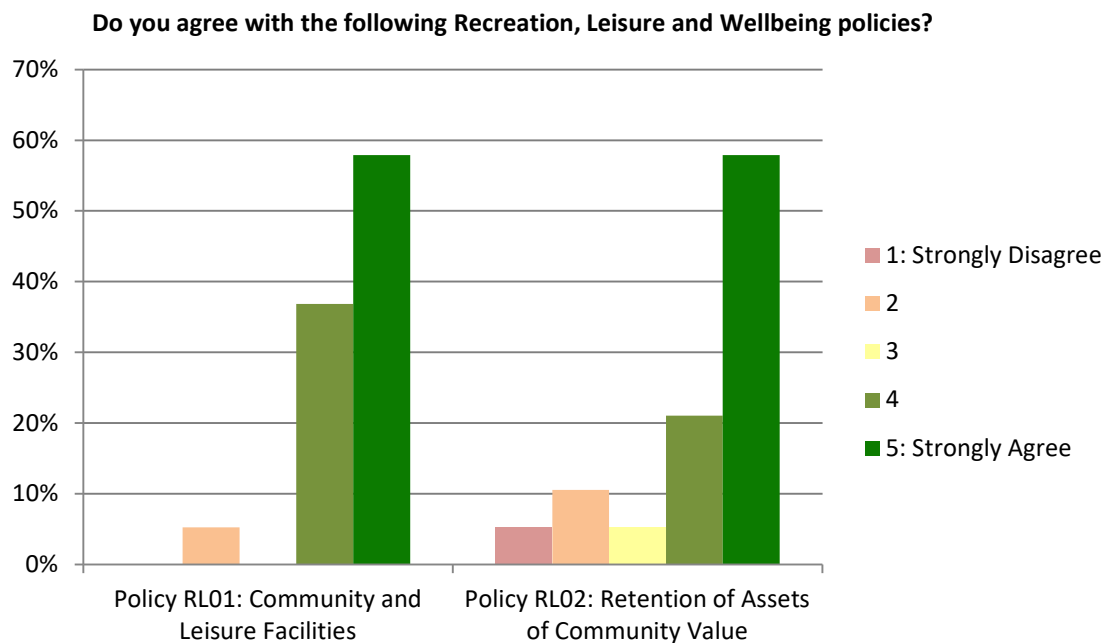
Plan Element	Summary of Changes Made
Policy TG01: Highways and Traffic Calming	<ul style="list-style-type: none"> <li>Surrey County Council's comments are noted.</li> <li>The policy has been amended slightly with reference to the corresponding policy within the Made Chiddingfold Neighbourhood Plan.</li> <li>Comments regarding HGV movements and speed limits are not planning matters and are outside the scope of the Neighbourhood Plan.</li> </ul>
Policy TG02: Sustainable Transport	<ul style="list-style-type: none"> <li>No changes proposed.</li> </ul>
Policy TG03: Car Parking Standards	<ul style="list-style-type: none"> <li>The policy wording has been amended to include reference to the recommended parking standards set out within the Car Ownership and Parking Analysis (December 2021). Reference to this document has been made in the supporting text.</li> </ul>

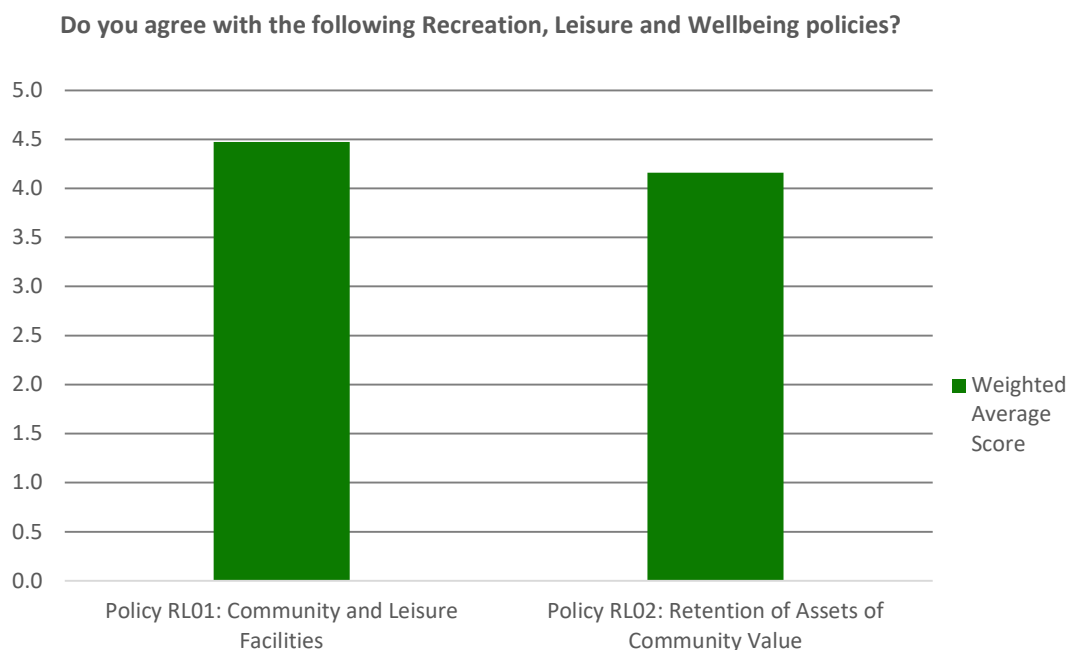


Policy TG04: Improved Bus Services	<ul style="list-style-type: none"> <li>No changes proposed to the policy wording. The policy is consistent with the wording included in the corresponding policy in the Made Chiddingfold Neighbourhood Plan.</li> <li>The supporting text has been amended to provide an update on the Surrey County Council consultation on the Digital Demand Responsive Transport service.</li> </ul>
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## Chapter 10: Recreation, Leisure and Wellbeing

2.222 Question 9 sought views on the extent to which people agreed the two Recreation, Leisure and Wellbeing policies (RL01 to RL02). Questionnaire results in response to the question **“Recreation, Leisure and Wellbeing policies?”** are summarised below:





### **Policy RL01: Community and Leisure Facilities**

#### Consultation Questionnaire

2.223 95% of 19 respondents stated they either agreed (37%) or strongly agreed (58%) with Policy RL01: Community and Leisure Facilities. The remaining 5% of respondents stated they disagreed with the policy. The weighted average score for Policy RL01 was 4.5 out of 5, which confirms overall broad agreement with the policy.

2.224 The written comments provided in relation to Policy RL01 were generally supportive but reference to good design and community engagement when bringing development proposals forward would be welcomed.

#### Statutory Consultees

2.225 WBC outlined that the intention of this Policy is support. However, it suggested that this Policy should be checked for consistency against LPP1 Policy RL01 as they appear to cover very similar aspects.

#### Other Written Submissions

2.226 No other written comments were provided in relation to Policy RL01.

### **Policy RL02: Retention of Assets of Community Value**

#### Consultation Questionnaire

2.227 84% of 19 respondents stated they either agreed (21%) or strongly agreed (58%) with Policy RL02: Retention of Assets of Community Value. 16% of respondents stated they either disagreed (11%) or strongly disagreed (5%) with the policy. The remaining 5% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy RL02 was 4.2 out of 5, which confirms overall broad agreement with the policy.

2.228 The written comments provided in relation to Policy RL02 include:



- (a) The policy should include the Winn Hall, KGV and recreation ground / children's playground, the village shop, the post office and the pub.
- (b) The policy should be deleted. The Neighbourhood Plan should not stipulate specific Assets of Community Value (ACV). ACVs are not a planning matter.

#### Statutory Consultees

2.229 WBC suggested that this Policy is checked for consistency with the NPPF, NPPG guidance and Assets of Community Value legislation. The latter part of the Policy appears aspirational and is not clear how it would be applied when determining planning applications, and it suggested moving it to the supporting text.

#### Other Written Submissions

2.230 No other written comments were provided in relation to Policy RL02.

### **Proposed Recreation, Leisure and Wellbeing Policy Changes**

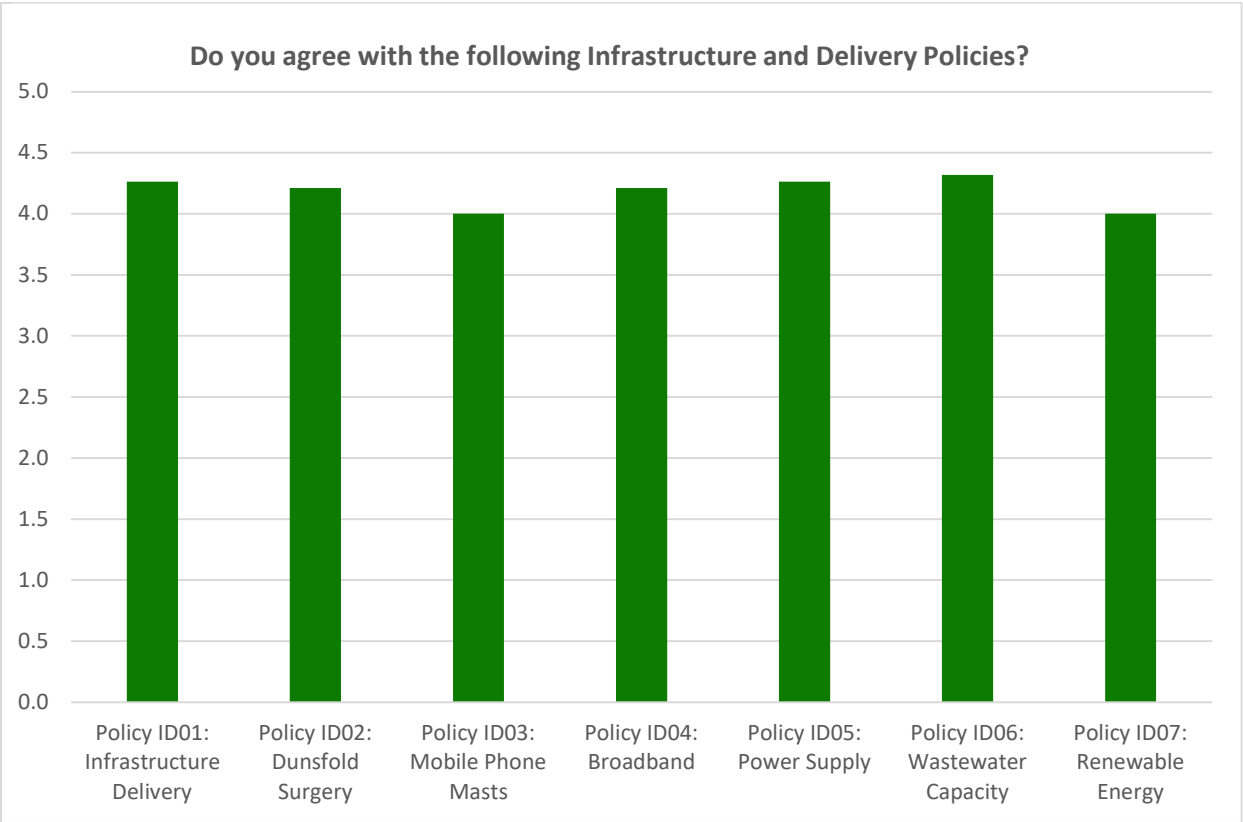
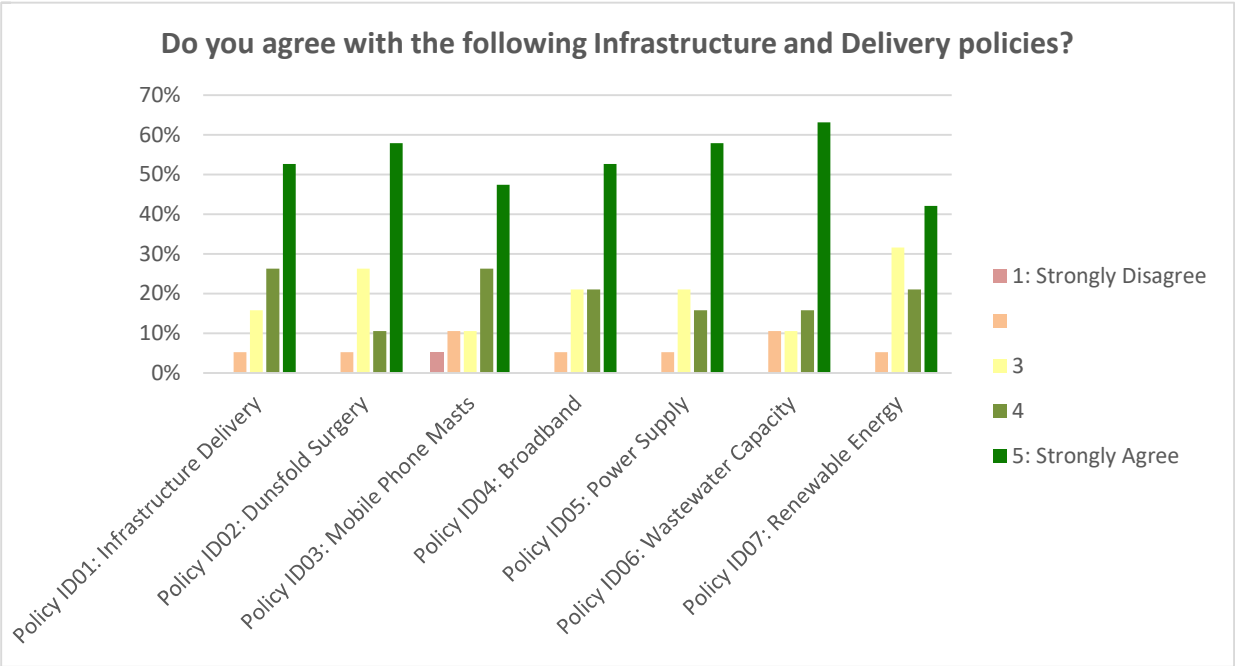
2.231 The changes made as a result of the consultation are summarised below:

Plan Element	Summary of Changes Made
Policy RL01: Community and Leisure Facilities	<ul style="list-style-type: none"> <li>No changes proposed. The policy is consistent with the wording included within a similar policy in the Made Chiddingfold Neighbourhood Plan.</li> </ul>
Policy RL02: Retention of Assets of Community Value	<ul style="list-style-type: none"> <li>The policy wording has been amended in line with the comments made by WBC. The second part of the policy has been moved to the supporting text.</li> <li>The policy is consistent with the wording included within a similar policy in the Made Chiddingfold Neighbourhood Plan.</li> </ul>

## **Chapter 11: Infrastructure and Delivery**

2.232 Question 10 sought views on the extent to which people agreed the seven Infrastructure and Delivery policies (ID01 to ID07). Questionnaire results in response to the question **"Infrastructure and Delivery policies?"** are summarised below:







### **Policy ID01: Infrastructure Delivery**

#### Consultation Questionnaire

2.233 79% of 19 respondents stated they either agreed (26%) or strongly agreed (53%) with Policy ID01: Infrastructure Delivery. 5% of respondents stated they disagreed with the policy. The remaining 16% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ID01 was 4.3 out of 5, which confirms overall broad agreement with the policy.

2.234 The written comments provided in relation to Policy ID01 included:

- (a) The policy should include reference to community allotment provision / communal growth spaces and sewage capacity upgrades.

#### Statutory Consultees

2.235 WBC recommended checking the Policy for consistency with the Local Plan, NPPF and relevant PPG guidance.

#### Other Written Submissions

2.236 No other written comments were provided in relation to Policy ID01.

### **Policy ID02: Dunsfold Surgery**

#### Consultation Questionnaire

2.237 68% of 19 respondents stated they either agreed (11%) or strongly agreed (58%) with Policy ID02: Dunsfold Surgery. 5% of respondents stated they disagreed with the policy. The remaining 26% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ID02 was 4.2 out of 5, which confirms overall broad agreement with the policy.

2.238 The written comments provided in relation to Policy ID02 questioned the viability and deliverability of the policy.

#### Statutory Consultees

2.239 WBC queried whether the policy sets out support for proposals which would improve facilities or is it a 'wish list' item. The policy can only be applied where planning applications come forward and is not clear how it would be applied when determining a planning application. If the intention is the latter, then this could be moved to a separate section which sets out non-land use issues.

#### Other Written Submissions

2.240 No other written comments were provided in relation to Policy ID02.

### **Policy ID03 Mobile Phone Masts**

#### Consultation Questionnaire

2.241 74% of 19 respondents stated they either agreed (26%) or strongly agreed (47%) with Policy ID03 Mobile Phone Masts. 16% of respondents stated they either disagreed (11%) or strongly disagreed (5%) with the policy. The remaining 11% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ID03 was 4.0 out of 5, which confirms overall broad agreement with the policy.

2.242 The written comments provided in relation to Policy ID03 include:



- (a) Strengthen the policy wording to ensure and development proposals are sensitive to the landscape.
- (b) Include a cross reference to other communication related policies within the Neighbourhood Plan.
- (c) The location of any new mast should be shown on the Key Diagram.

Statutory Consultees

2.243 WBC queried whether the policy sets out support for proposals which would improve facilities or is it a 'wish list' item. The policy can only be applied where planning applications come forward and is not clear how it would be applied when determining a planning application. If the intention is the latter, then this could be moved to a separate section which sets out non-land use issues.

Other Written Submissions

2.244 No other written comments were provided in relation to Policy ID03.

**Policy ID04: Broadband**

Consultation Questionnaire

- 2.245 74% of 19 respondents stated they either agreed (21%) or strongly agreed (53%) with Policy ID04: Broadband. 5% of respondents stated they disagreed with the policy. The remaining 21% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ID04 was 4.2 out of 5, which confirms overall broad agreement with the policy.
- 2.246 The written comments provided in relation to Policy ID04 include the needs to cross reference to other communication related policies within the Neighbourhood Plan.

Statutory Consultees

2.247 WBC queried whether the policy sets out support for proposals which would improve facilities or is it a 'wish list' item. The policy can only be applied where planning applications come forward and is not clear how it would be applied when determining a planning application. If the intention is the latter, then this could be moved to a separate section which sets out non-land use issues.

Other Written Submissions

2.248 No other written comments were provided in relation to Policy ID04.

**Policy ID05: Power Supply**

Consultation Questionnaire

- 2.249 74% of 19 respondents stated they either agreed (16%) or strongly agreed (58%) with Policy ID05: Power Supply. 5% of respondents stated they disagreed with the policy. The remaining 21% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ID05 was 4.3 out of 5, which confirms overall broad agreement with the policy.
- 2.250 The written comments provided in relation to Policy ID05 include the needs to cross reference to other power supply related policies within the Neighbourhood Plan.

Statutory Consultees

2.251 WBC queried whether the policy sets out support for proposals which would improve facilities or is it a 'wish list' item. The policy can only be applied where planning applications come forward and is not



clear how it would be applied when determining a planning application. If the intention is the latter, then this could be moved to a separate section which sets out non-land use issues.

Other Written Submissions

2.252 No other written comments were provided in relation to Policy ID05.

**Policy ID06: Wastewater Capacity**

Consultation Questionnaire

2.253 79% of 19 respondents stated they either agreed (16%) or strongly agreed (63%) with Policy ID06: Wastewater Capacity. 11% of respondents stated they disagreed with the policy. The remaining 11% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ID06 was 4.3 out of 5, which confirms overall broad agreement with the policy.

2.254 The written comments provided in relation to Policy ID06 include the need to cross reference to other wastewater related policies within the Neighbourhood Plan.

Statutory Consultees

2.255 WBC recommended that the Parish Council discusses wastewater capacity with the relevant statutory bodies.

Other Written Submissions

2.256 No other written comments were provided in relation to Policy ID06.

**Policy ID07: Renewable Energy**

Consultation Questionnaire

2.257 63% of 19 respondents stated they either agreed (21%) or strongly agreed (42%) with Policy ID07: Renewable Energy. 5% of respondents stated they disagreed with the policy. The remaining 32% of respondents stated they neither agreed nor disagreed with the policy. The weighted average score for Policy ID07 was 4.0 out of 5, which confirms overall broad agreement with the policy.

2.258 The written comments provided in relation to Policy ID07 include:

- (a) The need to address the increased potential interest in oil and gas exploration within the Neighbourhood Plan area.
- (b) Increase renewable energy requirements on new homes.

Statutory Consultees

2.259 WBC queried the justification and reasoning for proposals 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. This Policy also appears to be at odds with the text contained within paragraph 11.12 which suggests that "Proposals for renewable energy generation will be supported within Dunsfold". Whereas currently, ID07 only supports very specific types of proposals.

2.260 With regard to supporting text paragraph 11.13 WBC noted:

- (a) It is factually incorrect to state that infrastructure is only funded by two sources (CIL & Section 106), we would suggest this reference is removed.



- (b) 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."*

- 2.261 With regard to supporting text paragraph 11.14 WBC noted for factual correctness it 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."*
- 2.262 WBC outlined that in respect of paragraph 11.15, 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.
- 2.263 With regard to supporting text paragraph 11.17, WBC outlined that it is factually incorrect to suggest that all new development will be required to pay CIL.
- 2.264 With regard to supporting text paragraph 11.18, WBC outlined 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.
- 2.265 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).
- 2.266 With regard to supporting text paragraph 11.19, WBC outlined that it is 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. 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. However, it should be noted that Strategic CIL funds are allocated and spent by WBC in accordance with the agreed governance process.

#### Other Written Submissions

- 2.267 No other written comments were provided in relation to Policy ID07.

### **Infrastructure Delivery Projects**

#### Consultation Questionnaire

- 2.268 Question 11 asked for infrastructure project suggestions which CIL receipts from developments could be used to fund. 10 respondents provided suggestions, including:
- Make the Old School and field available for community use.
  - Allotments / community grow space.
  - Additional bus stop along Alfold Road, opposite Miller Lane.
  - Pedestrian path between Miller Land and the pub.
  - Car parking / electric charging facilities within the village.
  - Winn Hall energy efficiency improvements.



- Renovation of the red phone box and creation of a mini library.
- Wildflower patches on the Common.
- Sewage capacity improvements.
- Water butts in every home.
- Low level lighting.
- Solar farms.
- Upkeep of playing areas and community facilities.

### Statutory Consultees

2.269 No Statutory Consultee comments were received regarding Infrastructure Delivery Projects.

### Other Written Submissions

2.270 No other written comments were provided in relation to Infrastructure Delivery Projects.

### **Proposed Infrastructure and Delivery Policy Changes**

2.271 The changes made as a result of the consultation are summarised below:

Plan Element	Summary of Changes Made
Policy ID01: Infrastructure Delivery	<ul style="list-style-type: none"> <li>• A minor amendment has been made to refer to "development proposals" rather than "planning permission" for consistency and clarity.</li> <li>• The policy is consistent with the wording included within a similar policy in the Made Chiddingfold Neighbourhood Plan.</li> </ul>
Policy ID02: Dunsfold Surgery	<ul style="list-style-type: none"> <li>• No changes proposed. The policy is consistent with the wording included within a similar policy in the Made Chiddingfold Neighbourhood Plan.</li> </ul>
Policy ID03: Mobile Phone Masts	<ul style="list-style-type: none"> <li>• No changes proposed. The policy is consistent with the wording included within a similar policy in the Made Chiddingfold Neighbourhood Plan.</li> </ul>
Policy ID04: Broadband	<ul style="list-style-type: none"> <li>• No changes proposed. The policy is consistent with the wording included within a similar policy in the Made Chiddingfold Neighbourhood Plan.</li> </ul>
Policy ID05: Power Supply	<ul style="list-style-type: none"> <li>• No changes proposed. The policy is consistent with the wording included within a similar policy in the Made Chiddingfold Neighbourhood Plan.</li> </ul>
Policy ID06: Wastewater Capacity	<ul style="list-style-type: none"> <li>• No changes proposed. The policy is consistent with the wording included within a similar policy in the Made Chiddingfold Neighbourhood Plan.</li> </ul>
Policy ID07: Renewable Energy	<ul style="list-style-type: none"> <li>• The wording of the policy has been amended to take into account comments made by WBC.</li> </ul>
Supporting text on Financial Issues	<ul style="list-style-type: none"> <li>• The text has been amended to take into account the changes proposed by WBC.</li> </ul>



Infrastructure Delivery Projects List	<ul style="list-style-type: none"><li>• The suggestions made as part of the consultation in relation to the potential infrastructure projects will be taken into consideration in the preparation of the Infrastructure Delivery Plan which will be progressed once the Neighbourhood Plan has been “made”.</li></ul>
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