

# Strategic Environmental Assessment (SEA) for the Dunsfold Neighbourhood Plan

## Environmental Report

July 2022

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## Table of Contents

Non-Technical Summary .....	i-vi
1. Introduction .....	1
2. What is the Plan seeking to achieve? .....	2
3. What is the scope of the SEA? .....	5
Part 1: What has plan-making/ SEA involved to this point? .....	7
4. Introduction (to Part 1) .....	8
5. Defining growth scenarios.....	9
6. Assessing growth scenarios.....	15
7. The preferred option .....	21
Part 2: What are the SEA findings at this stage? .....	22
8. Introduction (to Part 2) .....	23
9. Appraisal of the draft Plan.....	26
10. Conclusions and recommendations .....	37
Part 3: What are the next steps? .....	38
11. Next steps and monitoring .....	39
Appendices.....	40
Appendix A Regulatory requirements .....	41

# Non-Technical Summary

## Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Dunsfold Neighbourhood Plan (DNP).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the DNP is a legal requirement.<sup>1</sup>

The DNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the Waverley Local Plan Part 1: Strategic Policies and Sites (LPP1, adopted 2018), and the saved policies of the 2002 Local Plan, which together form the Local Development Plan for the Borough of Waverley. The DNP is also being prepared in light of the emerging Local Plan Part 2: Site Allocations and Development Management Policies (LPP2) which, once adopted, will replace the saved policies of the 2002 Local Plan.

The SEA Environmental Report, including this NTS, accompanies the 'pre-submission' version of the plan in Regulation 14 consultation.

## Structure of the Environmental Report/ this NTS

SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved up to this point?
  - including in relation to 'reasonable alternatives'.
2. What are the SEA findings at this stage?
  - i.e., in relation to the draft plan.
3. What happens next?

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this NTS. However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

## What is the Plan seeking to achieve?

The vision of the DNP, which was developed during earlier stages of plan development, is as follows:

*"Dunsfold will embrace the changing nature of modern life whilst preserving and enhancing the Parish's historic rural character which 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*

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<sup>1</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The DDNP was screened in as requiring SEA by Collective Community Planning in 2020.

*services will complement Parish life and integrate with existing buildings, the Common and surrounding countryside.”*

To achieve this vision, the following planning principles have been established:

- **PP1:** To identify an appropriate amount of land within the Parish for the development of new housing to meet the target set in the Waverley LPP1, with the intention of delivering homes that would meet the need identified within the existing community, including for affordable housing.
- **PP2:** To ensure that new residential developments are carefully integrated into the community through high quality design and easy access to amenities, protecting the quality of life of new and existing residents.
- **PP3:** To require that the design of developments maintains the essential character of Dunsfold and protects our historic assets.
- **PP4:** To enable and encourage key amenities as well as utilities and infrastructure, to successfully accommodate the needs of a growing population.
- **PP5:** To prioritise the protection of our most valuable natural assets, including protected habitats, valuable trees and watercourses.
- **PP6:** To maintain the rural nature of the Parish, with important agricultural and equestrian land protected.
- **PP7:** To support Dunsfold Parish Council's role in the determination of planning applications, ensuring the community's views, as shown in the Neighbourhood Plan, are made clear to WBC.

## What is the scope of the SEA?

The scope of the SEA is reflected in a list of topics, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. A summary framework is presented here, and a full framework which includes assessment questions is provided within the main Environmental Report (**Table 3.1**).

SEA theme	SEA objective
Biodiversity and geodiversity	Protect and enhance all biodiversity and geological features.
Climate change	Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area.
	Support the resilience of the Neighbourhood Plan Area to the potential effects of climate change, including flooding.
Landscape	Protect and enhance the character and quality of landscapes within and surrounding the Neighbourhood Plan area.
Historic environment	Protect and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.
Land, soil, and water resources	Ensure the efficient and effective use of land.
	Use and manage water resources in a sustainable manner.

	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.
Population and community	Cater for existing and future residents needs as well as the needs of different groups in the community, and improve access to local, high quality community services and facilities.  Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan area.
Transportation	Promote sustainable transport use and reduce the need to travel.

## Plan-making/ SEA up to this point

An important element of the required SEA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches for the DNP.

Specifically, Part 1 of the report:

1. Explains the process of establishing the reasonable alternatives.
2. Presents the outcomes of assessing the reasonable alternatives; and
3. Explains reasons for developing a preferred option, in light of the assessment.

### Establishing the reasonable alternatives

Part 1 of the Environmental Report explores both the strategic parameters provided by the Local Plan and the available site options to establish alternatives to the preferred approach for housing development. Five potential growth scenarios are identified through this work as follows:

		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
Supply		1	2	3	4	5
Completions and commitments		68	68	68	68	68
Allocations	The Orchard	2	2	2	2	2
	Alehouse Field	4	4	4	4	4
	Wetwood Farm	7	7	7	5	5
	Springfield	10	-	20	10	20
	Coombebury	12	21	-	21	12
Total supply		103	102	101	110	111

## Assessing reasonable alternatives

The full assessment of the five scenarios is presented in Part 1 of the Environmental Report. The summary findings are presented below.

Topic	Scenario 1 103 homes	Scenario 2 102 homes	Scenario 3 101 homes	Scenario 4 110 homes	Scenario 5 111 homes
Biodiversity	=	=	=	=	=
Climate change	=	=	=	=	=
Landscape	1	2	1	1	1
Historic environment	1	2	2	2	2
Land, soil, and water resources	=	=	=	=	=
Population and community; and health and wellbeing	2	3	1	2	1
Transport	2	1	2	2	2

## Developing the preferred approach

The DNP Steering Group have provided the following reasons for developing the preferred approach in light of the alternatives assessment:

*“Informed by the Neighbourhood Plan’s evidence base, namely the Site Assessment and Selection Report and feedback to the various informal public consultations, the Steering Group identified five sites that are considered potentially suitable for housing development. These being: The Orchard, Alehouse, Wetwood Farm, Springfield and Coombebury.*

*As confirmed through the SEA process the Steering Group considered there are no reasonable alternative growth scenarios that would involve the allocation of a site other than the five identified sites.*

*Informed by the SEA process, which identified five alternative scenarios for distributing growth between the sites, the Steering Group note that no scenario stood out as having more or less significant effects.*

*Having reflected the public consultation feedback and having taken into account all of the Neighbourhood Plan evidence, including the SEA process, the Steering Group concluded that on balance Scenario 1 is the preferred option.”*

## Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the draft DNP. Assessment findings are presented as a series of narratives under the 'SEA framework' topic headings. The following overall conclusions and recommendations are reached:

Significant positive effects are concluded for the population and community SEA topic as the DNP provides an avenue for community input into an appropriate spatial strategy for growth in Dunsfold. These positive effects are further enhanced by DNP policies which seek a range of housing types, tenures and sizes and guide development with locally developed design principles.

Minor long-term positive effects are considered likely for the biodiversity and geodiversity and health and wellbeing SEA topics. For the prior, this is due to the premise for biodiversity protection, enhancement and net gain embedded through the DNP policy framework. For the latter, this is due because the low level of growth proposed through the DNP is unlikely to significantly impact on access to healthcare services or accessibility within and around the village. Instead, it supports development that enhances access to green spaces and green infrastructure networks, as well as improvements to active travel routes.

Neutral effects are concluded for the climate change, landscape, historic environment, land, soil, and water resources and transportation SEA topics. Regarding climate change, whilst the DNP policy framework supports local and national climate change targets, it is recognised that climate change is a global issue and that the scale of development proposed through the DNP is not anticipated to lead to significant effects. In terms of landscape and the historic environment, neutral effects are concluded due to the low level of growth proposed and high level of protection provided through the DNP policy framework, supplemented by the AONB management plan and LPP1. Regarding land, soil, and water resources, development will inevitably result in the loss of some agricultural and / or greenfield land due to the limited availability of brownfield land in the neighbourhood area. Finally, in terms of transportation, the small-scale growth proposed through the DNP is considered unlikely to lead to any significant negative effects on transport; the DNP also supports improvements to traffic and parking and aims to deliver better connectivity in terms of active travel and public transport.

## Recommendations

The following recommendations have been made following the appraisal of the draft plan:

- Regarding the biodiversity and geodiversity SEA topic, it is recommended that the DNP outlines specifically how the impacts of development on Ancient Woodland will be mitigated. This is because Ancient Woodland covers a large part of the neighbourhood area, which is regarded as a particularly rich habitat for wildlife and the importance of preserving ancient woodland is recognised by the NPPF (Paragraph 175).
- Regarding the landscape SEA topic, it is recommended that the site allocation policies be updated to reflect the need to consider the role of tree/ plantation screening, including re-provision as necessary.



## Next steps

Part 3 of the report explains the next steps that will be taken as part of plan-making and SEA.

### Plan finalisation

Following consultation, responses will be considered before the Plan and SEA Environmental are finalised for submission. Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

If the examination leads to a favourable outcome, the Neighbourhood Plan will then be subject to a referendum, organised by the Waverley Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the DNP will become part of the local planning framework for Waverley, covering the defined Neighbourhood Area.

### Monitoring

The SEA regulations require “*measures envisaged concerning monitoring*” to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Waverley Borough Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the DNP that would warrant more stringent monitoring over and above that already undertaken by the Council.

# 1. Introduction

## Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Dunsfold Neighbourhood Plan (DNP). The Plan is being prepared by Dunsfold Parish Council, in the context of the Waverley Local Plan. Once 'made' it will have material weight when deciding on planning applications, alongside the Waverley Borough Local Plan.
- 1.2 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the DNP is a legal requirement.<sup>2</sup>

## SEA explained

- 1.1 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA. In-line with the Regulations, a report (known as the **Environmental Report**) must be published for consultation alongside the draft plan that "*identifies, describes and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*".<sup>3</sup> The report must then be considered alongside consultation responses, when finalising the plan.
- 1.2 More specifically, the Report must answer the following three questions:
  - 1) What has plan-making / SEA involved **up to this point**?
    - including in relation to 'reasonable alternatives'.
  - 2) What are the SEA findings **at this stage**?
    - i.e., in relation to the draft plan.
  - 3) What happens **next**?

## This Environmental Report

- 1.3 This report is the Environmental Report for the DNP. It is published alongside the draft – 'pre-submission' – version of the plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.3 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information.<sup>4</sup> Each question is answered within a discrete 'part' of the report. However, to set the scene, an overview of the Plan and SEA scope is first provided.

<sup>2</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The Dunsfold Neighbourhood Plan was subject to screening in 2018, at which time it was determined that SEA *is* required.

<sup>3</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

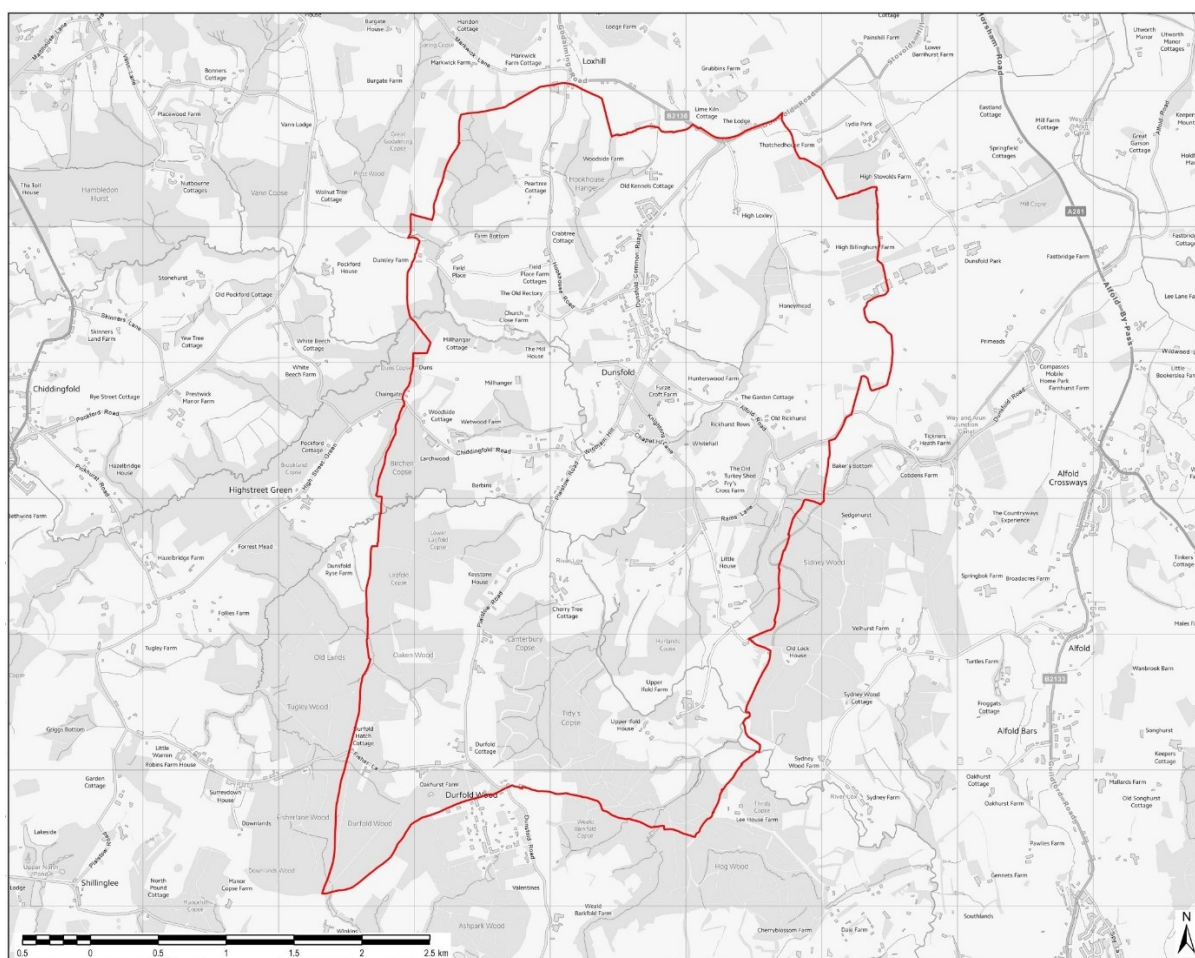
<sup>4</sup> See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

## 2. What is the Plan seeking to achieve?

### Introduction

2.1 This section considers the context provided by Waverley Borough Council's Local Plan before setting out the established Neighbourhood Plan vision and objectives. **Figure 2.1** identifies the area covered by the DNP.

**Figure 2.1: Dunsfold Neighbourhood Plan Area**



### Delivering on the requirements of the Local Plan

- 2.2 The DNP is being prepared in the context of the Waverley Local Plan Part 1: Strategic Policies and Sites (LPP1, adopted 2018), and the saved policies of the 2002 Local Plan, which together form the Local Development Plan for the Borough of Waverley. The DNP is also being prepared in light of the emerging Local Plan Part 2: Site Allocations and Development Management Policies (LPP2) which, once adopted, will replace the saved policies of the 2002 Local Plan.
- 2.3 The adopted LPP1 sets a vision and framework for the future development of the Borough up to 2032, directing the overall level of anticipated growth, identifies broad locations for growth and allocates strategic sites. Work is currently underway on LPP2 which will identify non-strategic site allocations and development management policies; however, LPP2 is not expected to

allocate sites within Dunsfold Parish, with the 'Pre-submission draft' document (2020) stating "Neighbourhood plans will deal with the housing allocations in Bramley, Chiddingfold, Cranleigh, Dunsfold and Elstead" (Para 7.5).

- 2.4 Neighbourhood plans are required to be in general conformity with the strategic policies of the Local Plan. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Waverley, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.5 LPP1 Policy SP2 (Spatial Strategy) identifies Dunsfold as a 'Smaller Village' and supports limited development in/around the village, recognising the area as outside of the Surrey Hill Area of Outstanding Natural Beauty (AONB) and outside of the Green Belt. Policy ALH1 (The Amount and Location of Housing) requires delivery of at least 100 new dwellings in Dunsfold. The policy further identifies that another 188 dwellings are expected to be delivered on windfall sites in the larger and smaller villages, which total 11 villages including Dunsfold.
- 2.6 Finally, it is important to note that central to LPP1 Policy SP2 (Spatial Strategy) is a new settlement at Dunsfold Aerodrome (Dunsfold Park), which is located at the eastern extent of Dunsfold Parish. The 100-home requirement for the Parish is over-and-above the 1,800 – 2,600 new homes anticipated at Dunsfold Aerodrome.

## Vision and objectives of the Plan

- 2.7 The vision of the DNP, which was developed during earlier stages of plan development, is as follows:

*"Dunsfold will embrace the changing nature of modern life whilst preserving and enhancing the Parish's historic rural character which 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."*

- 2.8 To achieve this vision, the following planning principles have been established:
  - **PP1:** To identify an appropriate amount of land within the Parish for the development of new housing to meet the target set in the Waverley LPP1, with the intention of delivering homes that would meet the need identified within the existing community, including for affordable housing.
  - **PP2:** To ensure that new residential developments are carefully integrated into the community through high quality design and easy access to amenities, protecting the quality of life of new and existing residents.
  - **PP3:** To require that the design of developments maintains the essential character of Dunsfold and protects our historic assets.
  - **PP4:** To enable and encourage key amenities as well as utilities and infrastructure, to successfully accommodate the needs of a growing population.

- **PP5:** To prioritise the protection of our most valuable natural assets, including protected habitats, valuable trees and watercourses.
- **PP6:** To maintain the rural nature of the Parish, with important agricultural and equestrian land protected.
- **PP7:** To support Dunsfold Parish Council's role in the determination of planning applications, ensuring the community's views, as shown in the Neighbourhood Plan, are made clear to WBC.

## 3. What is the scope of the SEA?

### Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the sustainability topics / issues / objectives that should be a focus of the assessment (of the plan and reasonable alternatives).

### Consultation

- 3.2 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>5</sup> As such, these authorities were consulted in 2018/19.<sup>6</sup>

### The SEA framework

- 3.3 **Table 3.1** presents a list of topics and objectives that together form the backbone of the SEA scope. Together they comprise a ‘framework’ under which to undertake assessment.

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<sup>5</sup> These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

<sup>6</sup> The SEA Scoping Report is available on the Neighbourhood Plan website, available to access via [this link](#)

**Table 3.1: The SEA framework (summary)**

<b>SEA topic</b>	<b>SEA objective</b>
Biodiversity and geodiversity	Protect and enhance all biodiversity and geological features.
Climate change	<p>Reduce the contribution to climate change made by activities within the Neighbourhood Plan area</p> <p>Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding</p>
Landscape	Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.
Historic environment	Protect and enhance the character and quality of landscapes and townscapes.
Land, soil, and water resources	<p>Ensure the efficient and effective use of land.</p> <p>Promote sustainable waste management solutions that encourage the reduction, re-use, and recycling of waste.</p> <p>Use and manage water resources in a sustainable manner.</p>
Population and community	<p>Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.</p> <p>Reduce deprivation and promote a more inclusive and self-contained community.</p> <p>Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.</p>
Health	Improve the health and wellbeing residents within the Neighbourhood Plan area.
Transportation	Promote sustainable transport use and reduce the need to travel.

## **Part 1: What has plan-making/ SEA involved to this point?**



## 4. Introduction (to Part 1)

### Overview

- 4.1 Work on the Dunsfold Neighbourhood Plan has been underway since 2017/18; however, the aim here is not to provide a comprehensive explanation of work to date. Rather, the aim is to explain work undertaken to develop and appraise **reasonable alternatives** in 2022.
- 4.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the plan, namely the allocation of land for housing, or **growth scenarios**.

### Why focus on growth scenarios?

- 4.3 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, or growth scenarios, in light of the Plan objectives (see para 2.8), and on the basis that a choice exists where there is the likelihood of being able to differentiate between the merits of alternatives in respect of 'significant effects'. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

### Who's responsibility?

- 4.4 It is important to be clear that:
- **Defining growth scenarios** - is ultimately the responsibility of the plan-maker, although the SEA consultant (AECOM) is well placed to advise.
  - **Assessing growth scenarios** - is the responsibility of the SEA consultant.
  - **Selecting the preferred scenario/option** - is the responsibility of the plan-maker.

### Structure of this part of the report

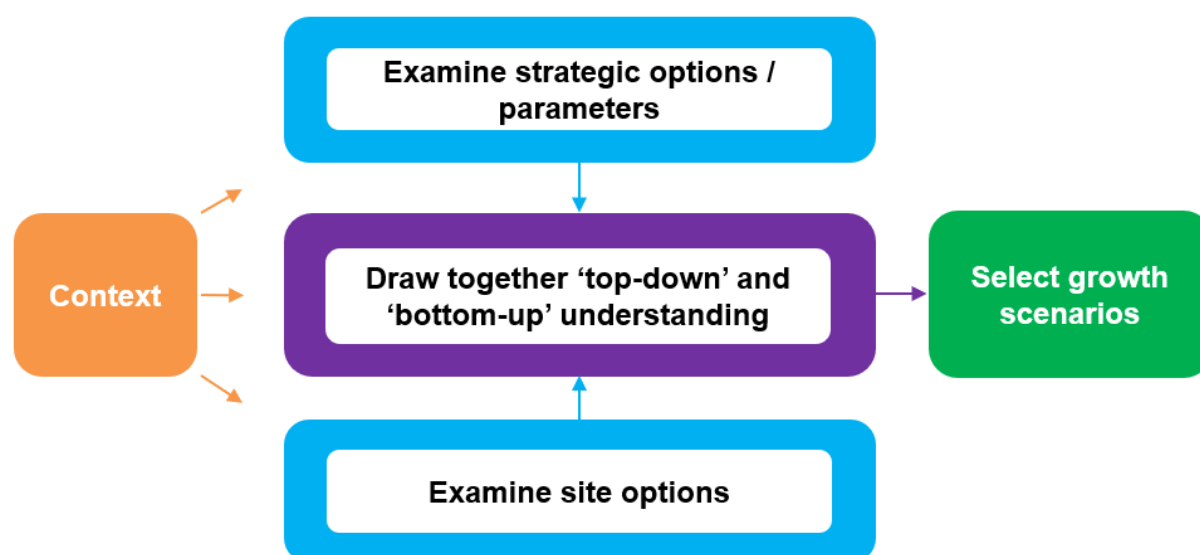
- 4.5 This part of the report is structured as follows:
- **Chapter 5** - explains the process of defining growth scenarios.
  - **Chapter 6** - presents the outcomes of appraising growth scenarios; and
  - **Chapter 7** - explains reasons for selecting the preferred option, considering the appraisal.

## 5. Defining growth scenarios

### Introduction

- 5.1 The aim here is to explain a process that led to the definition of reasonable growth scenarios, and thereby present “*an outline of the reasons for selecting the alternatives dealt with*”.<sup>7</sup>
- 5.2 Specifically, there is a need to: **1)** explain strategic options/parameters with a bearing on the establishment of growth scenarios; **2)** discuss work completed to examine site options (i.e., sites potentially in contention for allocation); and then **3)** explain how the ‘top down’ and ‘bottom up’ understanding generated were married together to arrive at growth scenarios.

**Figure 5.1: Defining growth scenarios**



### Strategic considerations (top-down)

- 5.3 As discussed, there is a requirement to provide for at least 100 homes over the duration of the LPP1 plan period. However, the bulk of this requirement has already been, or is set to be met, through houses already delivered since the start of the plan period (‘completions’) and houses that are set to be delivered at sites that currently benefit from planning permission (‘commitments’). Having subtracted completions and commitments from the LPP1 housing requirement, the residual requirement for the Dunsfold Neighbourhood Plan is at least **32 homes**.
- 5.4 Secondly, there is a need to consider two key spatial principles that set parameters for the establishment of growth scenarios:
- **Green gap** – a core objective of the NDP is the maintenance of a ‘green gap’ as a landscape buffer between Dunsfold and the committed Dunsfold Aerodrome new settlement. In addition to a desire to avoid any risk of settlement coalescence / impacts to the historic settlement pattern, the

<sup>7</sup> Schedule 2(8) of the SEA Regulations.

Parish Council sees maintenance of a green gap as important from a green infrastructure perspective, noting that a bridleway links the Aerodrome to Dunsfold via the green gap, and given the possibility of future enhancements to green infrastructure.

- **Proximity to main settlement** – Dunsfold Parish comprises the main village of Dunsfold along with several other smaller clusters of homes and small rural employment areas. The Parish Council recognises the importance of locating new homes in locations accessible to the main village as far as possible but does not believe that sites that would deliver new homes in locations away from the main village should be ruled-out as a rule, noting the recent *Braintree ruling*.<sup>8</sup>

## Site options (bottom up)

5.5 As a starting point, AECOM completed a Site Options Assessment (SOA) in 2018. Twenty site options were subjected to assessment (see **Table 5.1**), with two identified as performing well (**green**) and eleven identified as performing poorly (**red**). Three sites are shown in the table with ~~strikethrough text~~ because they have now either been withdrawn by the landowner (Sites 6 and Site 11) or have planning permission (Site 17).

**Table 5.1: Dunsfold site options assessed in 2018**

Ref.	Site name	Site size (ha)	SOA RAG rating
1	Alehouse Field	0.62	
2	Coombebury	0.99	
3	Wetwood Poultry Farm	0.95	
4	Wrotham Hill Site B	0.5	
5	Wrotham Hill Site A	0.74	
6	<del>Knightons</del>	<del>0.1</del>	
7	Rams Nest	1.8	
8	The Orchard	1	
9	New Pound Farm	3.34	
10	Mill Lane	0.45	
11	<del>Wetwood Cottage</del>	<del>1.42</del>	
12	Dunsfold Common Road	0.89	
13	High Billingshurst Farm Site 1	4.45	
14	High Billingshurst Farm Site 2	5.67	
15	Hatchlands	0.71	
16	Shoppe Hill	0.94	
17	<del>Millhanger, Chiddingfold Road</del>	<del>0.77</del>	
18	Binhams Lea	0.1	

<sup>8</sup> Braintree District Council v Secretary of State for Communities and Local Government & ORS [2018] EWCA Civ 610 (28 March 2018). This ruling dealt with the matter of ruling out sites as unsuitable for allocation solely on the grounds of distance from an established settlement boundary.

Ref.	Site name	Site size (ha)	SOA RAG rating
19	Old Croft, Shoppe Hill	0.05	
20	East of Dunsfold (Springfield)	2.48	

5.6 The next step was for the Parish Council to undertake a further Site Assessment, which assessed the potential sites against a set of ten Dunsfold Parish site selection principles that were developed by the Steering Group. This served to identify seven sites as potentially suitable for allocation, which were then published for informal consultation in 2021. In addition to those sites identified in the table above, two additional sites were subjected to assessment, namely: Westwood, Shoppe Hill; and the Old School and Playing Field.

5.7 Based on the Site Assessment and informal consultation the Parish Council identified the following five sites as performing relatively strongly, such that they are **progressed to the reasonable growth scenarios**:

- The Orchard – was **strongly supported** through the informal consultation. The site is distant from the main settlement, and a lack of footways means that walking to the main settlement is not practicable, but the site is located as part of a satellite cluster of homes and employment uses. A notable benefit of the site is the potential to make good use of previously developed land, and to deliver new employment space to support an existing small rural employment cluster, which reduces housing capacity to 4 homes. However, in response to a planning application made in February 2022 by the landowner (WA/2022/00606) the Steering Group subsequently reduced the potential capacity at The Orchard from 4 to **2 homes**.
- Wetwood Farm – was **strongly supported** through the informal consultation. It is even more distant and poorly connected to the main settlement than is the case for the Orchard. However, the site currently benefits from planning permission (permitted development) for five houses and a warehouse. An alternative scheme, that might potentially be supported through the Neighbourhood Plan, would see a 'housing-only' scheme (i.e., no warehouse) of up to 12 homes (a net increase of **7 homes**).
- Springfield – is a notably large site, that would extend a recently permitted scheme for eight homes (now building out) to the east of the village. The site is relatively poorly connected and notably constrained, including due to its location in the gap between the village and Dunsfold Aerodrome. However, it was **strongly supported** through the informal consultation. The capacity of the submitted site capacity is 32 homes. However, given the issues affecting the site the Parish Council supports a capacity of **10 homes** and potentially **new allotment space**.
- Alehouse Field – received a **mixed response** through the informal consultation. The site was originally thought to have capacity for around 10 homes, but detailed investigation reduces the **capacity reduces to 4 homes**. This site falls within the Dunsfold Conservation Area and is in proximity to several listed buildings, but there is considered to be good potential to address constraints through layout, landscaping, and design. A key benefit of the site is its proximity to the village centre, which is a key determinant in promoting the site for **housing for the elderly only**.

- Coombebury – received a **mixed response** through the informal consultation. It is a larger site that was recently the subject of a refused planning application ([WA/2021/0413](#)) and is now subject to appeal. The site is subject to constraints, is not well related to the settlement boundary of the village centre (less so than Alehouse Field) and would deliver little benefit to the existing community (e.g., new infrastructure). The Parish Council has [objected](#) to the planning application given the high density and poor design proposed. However, given the stretching nature of the housing requirement (specifically, the residual need for 32 homes from allocations) and limited supply from the four sites discussed above, there is a strong argument for allocation. The planning application was for 21 homes, but the Parish Council considers an appropriate capacity to be **12 homes**.
- 5.8 A second port of call is the one other site assessed by AECOM and assigned an amber score, namely New Pound Farm. This site is ruled out (i.e. is **not progressed** to the growth scenarios) based on the Parish Council's Site Assessment, which highlights a range of issues and constraints. A headline concern is that the site sits within the landscape gap between the village and Dunsfold Aerodrome. Furthermore, the site is overly large and, whilst it could be allocated in part, any further development in this area would risk setting a precedent further development still and, in turn, erosion of the landscape gap.
- 5.9 A third port of call is the one site assessed through the Parish Council's Site Assessment, but not through the earlier AECOM SOA (2018), namely Westwood, Shoppe Hill. This is a small site (0.18 ha) that benefits from relatively good connectivity to the main village. However, the Site Assessment highlights a notable landscape constraint, given the risk of impacts to sensitive views from an adjacent footpath. It is **not progressed** to the growth scenarios on balance.
- 5.10 A fourth port of call is Shoppe Hill, which stands out from the other sites rated 'red' by the AECOM SOA (2018) only because it was the subject of a recent planning application ([WA/2020/2082](#)) for four homes. The Parish Council [objected](#) to the application "*in the strongest possible terms*", and the reasons for objection are considered to primarily relate to inherent concerns with the suitability of the site for development, as opposed to concerns with the specifics of the proposed scheme. It is **not progressed** to the growth scenarios and planning permission was subsequently refused in February 2022.
- 5.11 A fifth port of call is Binhams Lea, which is a small site relatively well located in terms of accessing the village centre. A planning application for two homes ([WA/2015/2296](#)) was recently refused, in part, as it would result in the loss of an Oak Tree, which makes a valuable contribution to the character of the area and Conservation Area. As such, it is **not progressed**.
- 5.12 Finally, there is a need to briefly note the other sites that are available for allocation, but which were assigned a 'red' score by the AECOM SOA (2018), namely Wrotham Hill Site B, Wrotham Hill Site A, Rams Nest, Mill Lane, Dunsfold Common Road, High Billingshurst Farm Site 1, High Billingshurst Farm Site 2, Hatchlands and Old Croft, Shoppe Hill. None of these sites were found to perform well through the Parish Council's Site Assessment, and hence these sites are **not progressed** to the growth scenarios.

## Establishing growth scenarios

- 5.13 The starting point is a growth scenario involving allocation of the five sites listed at paragraph 1.21 with the Parish Council's preferred capacity at each site. This would involve allocation for 35 homes in total which, in combination with completions and commitments since the start of the plan period (68 homes), would mean a total supply of 103 homes over the plan period, such that the Local Plan target/requirement (at least 100 homes) would be met (plus there would be a modest 'supply buffer', to account for the risk of unforeseen delivery issues). This is **reasonable growth scenario 1**.
- 5.14 There are not considered to be any reasonable growth scenarios that would involve allocation of a site other than the five listed at paragraph 5.21. However, there are clearly alternative scenarios that would involve a different balance of growth between these five sites.
- 5.15 In particular, there are reasonable scenarios involving non-allocation of Wetwood Farm, Springfield and Coombebury, with the resulting supply shortfall, relative to reasonable growth scenario 1, met through additional supply elsewhere, such that the overall supply figure is broadly unchanged. Notwithstanding that the permitted 5 homes at Wetwood Farm would still be anticipated.
- 5.16 Specifically, it is reasonable to explore the possibility of additional supply at both Springfield and Coombebury. Whilst the discussion at paragraph 5.21 serves to highlight good reasons for reducing the capacity at sites to a level below that proposed by the land-owner / promoter, on the other hand, delivering sites to their full capacity can assist with development viability and, in turn, serve to secure affordable housing and wider 'planning gain', e.g. new or upgraded community infrastructure. Also, it can reduce concerns regarding long term development creep / sprawl.
- 5.17 This discussion (across Section 5 as a whole) leads to **five reasonable growth scenarios**. There are three final points to note:
- The Orchard and Alehouse Field can reasonably be held constant across the growth scenarios. The question of capacity at Alehouse Field is noted, but this is a smaller site, and its location in the conservation area serves as a strong reason for supporting a reduced scheme.
  - At Wetwood Farm the primary choice is considered to be in respect of whether or not to allocate more homes at the site.
  - There is no reasonable need to significantly vary total growth quantum.

**Table 5.2: The reasonable growth scenarios (constants in grey)**

<b>Supply</b>		<b>Scenario 1</b>	<b>Scenario 2</b>	<b>Scenario 3</b>	<b>Scenario 4</b>	<b>Scenario 5</b>
Completions and commitments		68	68	68	68	68
Allocations	The Orchard	2	2	2	2	2
	Alehouse Field	4	4	4	4	4
	Wetwood Farm	7	7	7	5	5
	Springfield	10	-	20	10	20
	Coombebury	12	21	-	21	12
<b>Total supply</b>		<b>103</b>	<b>102</b>	<b>101</b>	<b>110</b>	<b>111</b>

## 6. Assessing growth scenarios

### Introduction

- 6.1 The aim of this section is to present assessment findings in relation to the five reasonable alternative growth scenarios introduced above.

### Assessment findings

- 6.2 Table 6.1 presents the assessment. With regards to methodology

Within each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand firstly rank the scenarios in order of preference and then, secondly, highlight instances of a predicted positive (**green**), minor positive (**light green**), minor negative (**amber**) or negative (**red**) significant effect on the baseline. Also, ' = ' is used to denote performance on a par whilst grey shading denotes uncertainty.

The appraisal matrix is followed by a discussion, setting out reasons for the appraisal conclusions reached, with reference to available evidence.



*Table 6.1: Growth scenarios assessment findings*

Topic	Scenario 1 103 homes	Scenario 2 102 homes	Scenario 3 101 homes	Scenario 4 110 homes	Scenario 5 111 homes
Biodiversity	=	=	=	=	=
Climate change	=	=	=	=	=
Landscape	1	2	1	1	1
Historic environment	1	2	2	2	2
Land, soil, and water resources	=	=	=	=	=
Population and community; and health and wellbeing	2	3	1	2	1
Transport	2	1	2	2	2

## Discussion

6.3 It is not the aim of this assessment to arrive at a conclusion regarding which scenario is best performing, or ‘most sustainable’, overall, because the assessment is undertaken with no assumptions regarding the degree of importance, or ‘weight’, that should be assigned to each of the eight topics that together comprise the SEA framework.

6.4 The following paragraphs consider each topic in turn.

6.5 **Biodiversity** – all the sites across the different scenarios are within three kilometres of the Chiddingfold Forest SSSI. The Wetwood Farm and The Orchard sites, located outside of the Dunsfold settlement boundary to the south-west, are located less than one kilometre away from this designation. Both sites are associated with onsite priority habitat (ancient woodland and deciduous woodland at the first, ancient woodland at the latter). As discussed in Section 5, a core objective of the NDP is the maintenance of a ‘green gap’, which will act as a landscape buffer between the existing Dunsfold settlement and the committed Dunsfold Aerodrome development to the east. As such, there is a need to consider the potential long-term expansion of Dunsfold in this direction. None of the sites fall within the green gap. Closest to this gap is the Springfield and Coombebury sites where bordering woodland, woodpasture, and parkland could contribute to the character and ecological value of this area and should be protected in future development.

- 6.6 The Springfield site overlaps with the Network Expansion Zone and restorable habitat classifications<sup>9</sup>, indicating the site has the potential to recover, transition back to its primary habitat type and act as a link in the local habitat network in the surrounding landscape. The Coombebury site and the Alehouse Field site are also located on land that is suitable for restoration, with priority habitat on site and in proximity including ancient woodland, deciduous woodland and woodpasture and parkland priority habitats. The Orchard site is located in an area classified as Network Enhancement Zone 2, which has the potential to connect habitats together in a wider landscape network. Therefore, it is clear there is a potentially significant opportunity to restore degrading habitats at the three sites closest to the settlement boundary, and the opportunity to link habitats at The Orchard to a wider network.
- 6.7 In conclusion, no significant effects are expected to arise from development, but there is the potential for positive effects to arise for biodiversity and geodiversity. It is not possible to differentiate between the scenarios with any confidence given they all have the potential to deliver enhancements to the biodiversity of the area and support strategic / landscape objectives.
- 6.8 Climate change – beginning with the matter of **climate change adaptation / resilience** to anticipated effects of climate change, flood risk is typically a primary consideration. All sites are within Flood Zone 1 (low flooding probability), but the Wetwood Farm and The Orchard sites are at risk of surface flooding; the Coombebury and Springfield site are adjacent to sections of land at risk of surface flooding. Appropriate sustainable drainage systems should be considered under any growth scenario to avoid negative effects arising in this respect.
- 6.9 For **climate change mitigation / decarbonisation**, the primary consideration is minimising per capita greenhouse gas emissions from transport, which includes minimising the need to travel and supporting a shift away from polluting transportation (for example, by supporting electric vehicle (EV) charging infrastructure). All scenarios include Wetwood Farm and The Orchard sites, which are situated a distance from the settlement boundary without suitable footways to encourage walking to the services in Dunsfold and minor negative effects are anticipated in this respect. The variable sites under options are reasonably well located to promote active travel opportunities.
- 6.10 In conclusion, likely increases in built footprint are predicted as part of the future baseline with or without the plan and significant effects are not predicted. No meaningful differences can be drawn between the options. It is noted that Waverley Borough Council have committed to aim to be carbon-neutral by 2030, 20 years ahead of the national net zero target date of 2050. To reach this target, Waverley Borough Council have produced a [climate strategy](#) to help tackle climate change in the borough, including in the Dunsfold area.
- 6.11 **Landscape** – as has been discussed, it will be important to ensure that any expansion in Dunsfold does not reach into the ‘green gap’ that acts as a landscape buffer between the existing Dunsfold settlement and the committed Dunsfold Aerodrome development to the east. In this respect, none of the sites fall within the green gap.

<sup>9</sup> Natural England (2020) ‘National Habitat Network Maps’ can be accessed [here](#).

- 6.12 It is anticipated that localised landscape impacts could be mitigated through sympathetic design, such as landscaping and green infrastructure implementation. This could, in part, be delivered at Springfield which could provide new allotment space (all options except Option 2).
- 6.13 Another consideration is the proximity of Dunsfold to the Surrey Hills Area of Outstanding Natural Beauty (AONB) to the west. The AONB's management plan recognises that significant parts of the Surrey landscape adjacent to the AONB are designated as Areas of Great Landscape Value (AGLV), which include the Dunsfold area. AGLVs have been instrumental to the conservation and enhancement of the Surrey Hills AONB, and as such development should take into consideration the continuation of this important service.
- 6.14 All sites are located within the AGLV, and Wetwood Farm is located closest to the AONB boundary to the west. However, Wetwood Farm is not visible from the AONB. Again, it is anticipated that impacts could be mitigated through design sympathetic to landscape sensitivities.
- 6.15 In conclusion, no significant effects are expected through development in Dunsfold, i.e., effects are interpreted as being neutral. There are no significant differences to draw between the options which avoid development in the green gap and could be supported by high-quality design proposals and policy mitigation. The potential for new green infrastructure (allotment space) at Springfield, make Options 1, 3, 4, and 5 marginally preferable to Option 2 by way of its inclusion.
- 6.16 **Historic environment** – a principle of the neighbourhood plan is to ensure the design of developments maintains the essential character of Dunsfold and protects historic assets. Historic environment assets within the Dunsfold area include 53 listed buildings, the Dunsfold Conservation Area, and the St Mary's Church Conservation Area. Most of the listed buildings are concentrated in and around the settlement boundary. There are a couple of Grade II listed buildings in the area surrounding The Orchard, Springfield, and Coombebury sites, and there are six Grade II listed buildings in proximity to the Alehouse Field site. Additionally, the Alehouse Field site falls within the Dunsfold Conservation Area and the Springfield and Coombebury sites are located in proximity to it. As the Alehouse Field site is a constant across the five scenarios, development at this site will need to be sympathetic of the historic setting, addressing constraints through layout, landscaping, and design. Development that is conscious of the historic setting would also benefit the Coombebury and Springfield sites.
- 6.17 In conclusion, there is a possibility of significant negative effects under all scenarios due to the inclusion of the Alehouse Field site, which is surrounded by listed buildings and within the Dunsfold Conservation Area. It is recognised that plan policies will be required to reduce the significance of these effects and they should be developed in consultation with Historic England. Scenarios involving the Coombebury and Springfield sites are less preferable due to their proximity to the Dunsfold Conservation Area and Grade II listed buildings – and by means of less development at each individual site, Option 1 is marginally preferred.
- 6.18 **Land, soil, and water resources** - the key consideration here is loss of productive agricultural land, particularly that which is likely to be of best and most versatile (BMV) quality. The nationally available low-resolution dataset appears to show Dunsfold is underlain with 'grade 3' quality land (which may or

may not be BMV)<sup>10</sup>. This being the case, there is no potential to differentiate between the site options in question in respect of the quality of agricultural land.

- 6.19 In terms of water resources, the Springfield and Coomebury sites are located within proximity to water courses, which join the Loxwood Stream. This stream has issues associated with agricultural pollution and rural land management, so it is not expected to be impacted by development at these sites. However, to mitigate any effects of development in relation to water quality, appropriate sustainable drainage systems should be implemented.
- 6.20 In conclusion, whilst the presence of BMV land is uncertain, given the scale of development being proposed at any given site, no significant negative effects are considered likely. All scenarios utilise land that has already been partially or fully developed where available, also decreasing the chance of BMV land loss. However, it is recognised that an in-depth survey has not been carried out for Dunsfold, and as such there is a level of uncertainty. No meaningful differences are drawn between the options.
- 6.21 **Population and community; and health and wellbeing** – there is a need to deliver housing to meet the target set by the Waverley Local Plan and the identified need within the existing community. This includes affordable housing provision and the need for housing for the elderly (particularly those wishing to relocate from outlying properties). In this respect, there is an argument for a higher growth scenario to be taken forward (Scenarios 4 and 5). Moreover, new residential developments should be carefully integrated into the community – which could be more of an issue at the Wetwood Farm and The Orchard sites given their proximity from the main settlement area (under all options).
- 6.22 Another principle of the neighbourhood plan is to enable and encourage access to key amenities as well as utilities and infrastructure to successfully accommodate the needs of a growing population. In this respect, Alehouse Field is noticeably accessible, and the Springfield site could deliver community benefits with additional allotment space. Additionally, all options are considered likely to lead to minor positive effects in relation to economy and employment through the inclusion of site 'The Orchard' which will deliver additional employment space in the neighbourhood area. The access provided to new development at Alehouse Field would also support elderly people's specialist housing needs.
- 6.23 In conclusion, significant positive effects are predicted, due to the increase in housing and affordable housing as identified by the community. Focusing on housing needs and community infrastructure, Scenario 2 is less preferred to the remaining options, as it will not bring forward the Springfield site or community benefits by the way of new allotment space. Options which maximise development at Springfield (Scenarios 3 and 5) are also marginally preferred overall by way of improving the viability of such new provisions.
- 6.24 **Transportation** – easy access from the new housing sites to settlement services and amenities should be enabled, and infrastructure should reflect the needs of a growing population.
- 6.25 Currently, there is limited sustainable transport in the Dunsfold area – a single bus service that runs infrequently Monday-Saturday. There is also a limited

<sup>10</sup> Natural England (2017) 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map London and the South East' can be accessed [here](#).

cycle and footpath network. Considering this, the Wetwood Farm and The Orchard sites are viewed as less favourable due to their distance from the Dunsfold settlement. As both are constant throughout the scenarios no significant differences can be drawn between the Scenarios.

- 6.26 It is noted that the Springfield site is viewed as relatively poorly connected and may require greater levels of infrastructure to connect it to the settlement and road network.
- 6.27 Furthermore, it is acknowledged that under any scenario there will be a need to travel out of Dunsfold to access further facilities, like a supermarket.
- 6.28 In conclusion, no significant effects are anticipated through development, but it is noted there will be a negative impact due to the increase of private vehicles on the road in Dunsfold. By excluding the Springfield site (which is reliant on greater levels of mitigation to reduce negative effects arising), Scenario 2 is marginally preferred to the remaining options.

## 7. The preferred option

### Introduction

- 7.1 The aim of this section is to present the Steering Group's reasons for supporting the preferred option, in light of the scenarios assessment presented above.

### Reasons for supporting the preferred approach

- 7.2 The Steering Group provided the following text:

*"Informed by the Neighbourhood Plan's evidence base, namely the Site Assessment and Selection Report and feedback to the various informal public consultations, the Steering Group identified five sites that are considered potentially suitable for housing development. These being: The Orchard, Alehouse, Wetwood Farm, Springfield and Coombebury.*

*As confirmed through the SEA process the Steering Group considered there are no reasonable alternative growth scenarios that would involve the allocation of a site other than the five identified sites.*

*Informed by the SEA process, which identified five alternative scenarios for distributing growth between the sites, the Steering Group note that no scenario stood out as having more or less significant effects.*

*Having reflected the public consultation feedback and having taken into account all of the Neighbourhood Plan evidence, including the SEA process, the Steering Group concluded that on balance Scenario 1 is the preferred option."*

## **Part 2: What are the SEA findings at this stage?**

## 8. Introduction (to Part 2)

8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the draft DNP. This chapter presents:

- An appraisal of the current version of the DNP under the eight SEA theme headings; and
- The overall conclusions at this current stage and recommendations for finalising the submission version of the Plan.

### DNP policies

8.2 The DNP puts forward 43 policies to guide development in the Plan area, including five site allocation policies (HA1 to HA5). **Table 8.1** identifies these policies, grouped under eight overarching themes.

**Table 8.1: DNP policies**

Policy reference	Policy name
<b>Vision and Key Planning Principles</b>	
<b>Policy PP01</b>	Core Planning Principles
<b>Policy PP02</b>	Spatial development of Dunsfold
<b>Policy PP03</b>	To prevent coalescence of Dunsfold settlement with Dunsfold Park
<b>Housing</b>	
<b>Policy HO1</b>	<b>Provision of Housing</b>
<b>Policy HA1</b>	Alehouse
<b>Policy HA2</b>	Coombebury
<b>Policy HA3</b>	Wetwood Farm
<b>Policy HA4</b>	The Orchard
<b>Policy HA5</b>	Springfield
<b>Policy HO2</b>	Self-Build Houses
<b>Policy HO3</b>	Windfall Sites
<b>Policy HO4</b>	Mix of Housing Size
<b>Natural Environment</b>	
<b>Policy NE01</b>	Habitats and Biodiversity
<b>Policy NE02</b>	Trees, Woodland, Hedgerows and Landscaping
<b>Policy NE03</b>	Flood Risk, Sustainable Drainage Systems and Water Management
<b>Policy NE04</b>	Light Pollution and Dark Skies
<b>Policy NE05</b>	Noise Pollution
<b>Environment, Sustainability and Design</b>	
<b>Policy ES01</b>	Character and Design
<b>Policy ES02</b>	Landscape and Visual Impact
<b>Policy ES03</b>	Design Standards



<b>Policy reference</b>	<b>Policy name</b>
<b>Policy ES04</b>	Space Standards
<b>Policy ES05</b>	Public Realm
<b>Policy ES06</b>	Creation of Safe Public and Private Spaces
<b>Policy ES07</b>	Heritage Assets
<b>Policy ES08</b>	Sustainable Design
<b>Policy ES09</b>	Areas of Strategic Visual Importance
<b>Employment and Business Support</b>	
<b>Policy EB01</b>	Local Employment Space
<b>Policy EB02</b>	Equestrian Related Development
<b>Policy EB03</b>	Communications
<b>Policy EB04</b>	Advertisements
<b>Transport and Getting Around</b>	
<b>Policy TG01</b>	Highways and Traffic Calming
<b>Policy TG02</b>	Sustainable Transport
<b>Policy TG03</b>	Car Parking Standards
<b>Policy TG04</b>	Improved Bus Services
<b>Recreation, Leisure and Wellbeing</b>	
<b>Policy RL01</b>	Community and Leisure Facilities
<b>Policy RL02</b>	Retention of Assets of Community Value
<b>Infrastructure and Delivery</b>	
<b>Policy ID01</b>	Infrastructure Delivery
<b>Policy ID02</b>	Dunsfold Surgery
<b>Policy ID03</b>	Mobile Phone Masts
<b>Policy ID04</b>	Broadband
<b>Policy ID05</b>	Power Supply
<b>Policy ID06</b>	Wastewater Capacity
<b>Policy ID07</b>	Renewable Energy

## Methodology

- 8.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 8.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.

## 9. Appraisal of the draft Plan

### Introduction

- 9.1 The assessment is presented below under the eight SEA themes established through scoping (see **Chapter 3**). Finally, cumulative effects are explored. **Chapter 10** then presents overall conclusions and any recommendations.

### Biodiversity and geodiversity

- 9.2 The neighbourhood area falls within the 9-kilometre buffer zone of the Thursley, Hankley and Frensham Commons Special Protection Area (SPA), which is located to the northwest of the neighbourhood area. All the sites inevitably fall within the 9-kilometre buffer zone of the SPA. However, as the neighbourhood area is located approximately 5.7 kilometres from the SPA, it is unlikely that any proposed development will have a direct impact on the site. Rather, proposed development has the potential to increase visitor numbers to the SPA.
- 9.3 The neighbourhood area is also located approximately 9 kilometres from the Wealden Heaths Phase II SPA and 3.1 kilometres from the Ebernoe Common SAC. When considering proximity, the Ebernoe Common SAC is likely to be most effected by proposed development within the neighbourhood area.
- 9.4 In terms of nationally designated sites, the Chiddingfold Forest Site of Special Scientific Interest (SSSI) falls within the southern extent on the neighbourhood area. This SSSI's Impact Risk Zone (IRZ) reaches into the northern extent of the neighbourhood area, with constraints on residential / rural residential development decreasing as the distance from the SSSI increases.
- 9.5 Policy NE01 (Habitats and Biodiversity) of the draft DNP outlines that *“any development proposal that results in significant harm to designated environmental assets, especially the Chiddingfold Forest SSSI, the Wealden Heaths Phase II SPA, the Ebernoe Common SAC and all areas of Ancient Woodland that cannot be avoided, adequately mitigated or, as a last resort, compensated for, will only be support in exceptional circumstances”*.
- 9.6 Whilst Policy NE01 (Habitats and Biodiversity) sets out that development proposals will be required to demonstrate *“the achievement of a biodiversity net gain”*, it does not go on to detail the specific measures that should be taken to achieve this at the proposed site allocations. Given that there is now a mandatory requirement for 10% biodiversity net gain, it is important that the DNP outlines how this will be achieved at the site allocations, considering the unique biodiversity opportunities presented at each site.
- 9.7 The neighbourhood area contains 12 Sites of Nature Conservation Interest (SNCIs) (also known as Local Wildlife Sites), which provide corridors for the natural dispersal and migration of species. One of the core planning principles underpinning the DNP is to *“prioritise the protection of our most valuable natural assets, including protected habitats, valuable trees and watercourses”*.
- 9.8 Regarding the proposed housing allocations, Coombebury (Policy HA2) is close to Dunsfold Green, and Springfield (Policy HA5) is adjacent to Dunsfold Common, which are both SNCIs. However, the policies for these allocations do

not set out mitigation measures concerning the impact of development on the SNCIs, which is important as disturbance to these sites from development could disrupt the dispersal and migration of species.

- 9.9 Notably, development proposed through the DNP has the potential to negatively affect local biodiversity and geodiversity. Across the neighbourhood area, development could lead to noise, light and air pollution, as well as increased disturbance from recreation. However, it is recognised that the level of growth is set by the strategic parameters of the Local Plan. As such, it is the location of growth that will be influenced by the DNP. Nevertheless, relevant policies are in place to mitigate these effects of development, including Policy NE04 (Light Pollution and Dark Skies) and Policy NE05 (Noise Pollution).
- 9.10 Ancient woodland covers a large part of the neighbourhood area, which is regarded as a particularly rich habitat for wildlife and the importance of preserving ancient woodland is recognised by the NPPF (Paragraph 175). Although none of the housing allocations fall within or near ancient woodland, Coombebury (Policy HA2) and Springfield (Policy HA5) border deciduous woodland. It is recommended that the DNP outlines specifically how the impacts of development on this habitat will be mitigated.
- 9.11 Wetwood Farm (Policy HA3) partially covers woodland, and if this were to be cleared for the purpose of development, it would leave the existing habitat fragmented as this piece of land connects Standing Wood to the northeast and Birchen Copse to the southwest. Habitat fragmentation should be avoided where possible, as ecological connectivity is vital for the movement of wildlife.
- 9.12 In response to this, Policy NE02 (Trees, Woodland, Hedgerows and Landscaping) outlines that woodland, groups of trees, and hedgerows should be retained. Moreover, *“development proposals should include details of the long-term management and maintenance of new and existing trees and landscaping”* and *“where significant harm to existing woodland and important trees and hedgerows cannot be avoided, it should be adequately mitigated for”*.
- 9.13 Overall, assuming the recommendations set out above are adopted by the DNP, it is considered that the premise for biodiversity protection, enhancement and net gain embedded through the DNP policy framework will lead to **minor long-term positive effects** for biodiversity and geodiversity.

## Climate change

- 9.14 The climate change SEA objectives have a dual focus of reducing the contribution of the neighbourhood area to climate change and supporting resilience to the potential effects of climate change, particularly flooding. Development Plans can contribute to mitigating the effects of climate change by minimising greenhouse gas emissions from the built environment. Adapting to the effects of climate change includes ensuring development is directed away from areas at greatest risk of flooding and limiting effects of extreme weather.
- 9.15 In terms of adapting to climate change, the DNP performs well overall, focussing growth away from areas of fluvial and surface water flood risk. Outside of the housing allocations, the DNP recognises that flooding is a problem in parts of the village, largely concentrated around the river corridors of the River Lox and Loxwood Stream.

- 9.16 In response to this, Policy NE03 (Flood Risk, Sustainable Drainage Systems and Water Management) builds upon the provisions of the NPPF (2021), adopted LPP1 (2013), and emerging LPP2 in terms of addressing the wider flood risk issues in the neighbourhood area. Policy NE03 sets out that development proposals *“will not be at risk of flooding nor increase the risk of flooding elsewhere”*. This is to be demonstrated through planning applications, with sustainable drainage measures incorporated where appropriate.
- 9.17 Well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk). Enabling and providing for green infrastructure within the neighbourhood area is therefore a key opportunity in which the DNP can help to promote climate change adaptation measures. Policy ES05 (Public Realm), Policy NE01 (Habitats and biodiversity) and Policy NE02 (Trees, Woodland, Hedgerows and Landscaping) perform particularly positively in this respect. Specifically, Policy NE01 highlights that *“the provision of additional habitat resources for wildlife, especially via wildlife corridors and stepping stones, will be encouraged”*.
- 9.18 In terms of climate change mitigation, in line with national and local targets, the DNP seeks to reduce emissions, contributing positively towards the UK, and Waverley’s, commitment to achieving carbon neutrality by 2030<sup>11,12</sup>. In this context, Policy ES08 (Sustainable Design) supports *“innovative approaches to construction of low carbon development”*. Policy ES08 encourages use of the Passivhaus standard, recognising that achieving this standard will make the most significant contribution to mitigating climate change that the DNP can deliver. Further specific climate mitigation measures include *“the provision of solar photovoltaic or solar thermal cells as part of development”* and *“the use of the highest quality, thermally efficient building materials”* contributing positively towards *“achiev[ing] the highest level of sustainable design”*.
- 9.19 In terms of energy production, Policy ID07 (Renewable Energy) supports opportunities *“to increase the proportion of energy generated by renewable sources”*. In line with Policy ID07, proposals for renewable energy generation will be supported within Dunsfold, subject to being in accordance with other policies of the DNP.
- 9.20 Sustainable travel is discussed in depth under the Transportation SEA topic below. However, it is recognised that provisions set out in Policy TG02 (Sustainable Transport) and TG04 (Improved Bus Services) are likely to be effective at reducing emissions from transport. This is achieved by targeting local improvements that can support sustainable transport, as well as by supporting a modal shift through increased active travel provisions.
- 9.21 Reliance on the private car makes a substantial contribution towards carbon emissions, and its decreased use will help meet the Council’s aim of becoming carbon neutral by 2030. Notably, Policy TG03 (Car Parking Standards) states that *“All car parking spaces associated with new residential development should be designed to support future installation of electric charging”*

<sup>11</sup> In June 2019 legislation passed to commit the UK to a legally binding target of net zero emissions by 2050, news story available to access via [this link](#)

<sup>12</sup> In September 2019 Waverley Borough Council passed a motion, declaring a climate emergency and committing the council to become a carbon neutral council by 2030, Carbon Neutrality Action Plan 2020 to 2030 available to access via [this link](#)

*equipment*". Supporting electric vehicle charging points alongside new development will contribute positively towards net zero commitments.

- 9.22 Overall, it is recognised that climate change is a global issue, and that the scale of development proposed through the DNP is not anticipated to lead to significant effects. Nonetheless, the DNP policy framework supports local and national climate change targets and is therefore predicted to have residual **neutral effects** with an element of uncertainty on climate change.

## Landscape

- 9.23 Dunsfold's countryside is highly valued by both residents and visitors and is of national and international importance. Dunsfold lies on the edge of the Surrey Hills Area of Outstanding Natural Beauty (AONB); it is currently designated an Area of Great Landscape Value (AGLV) but is shortly to be designated an AONB (pending the extension of the Surrey Hills AONB). In the interim, while Policy RE3(II) of the LPP1 provides enhanced protection to the AGLV area, the DNP policy framework seeks to supplement this somewhat, recognising the importance of the AGLV designation in protecting the integrity of the AONB landscape, particularly views to and from the AONB.
- 9.24 From the onset, environment, sustainability, and design objective ES04 states that *"development particularly when sited on the edge of Dunsfold Village will maintain visual connection with the countryside and seek to minimise visual impact on the surrounding countryside"*.
- 9.25 Overarching Policy PP01 (Core Planning Principles) states that *"development must preserve the Parish's intrinsic beauty and network of rural village and hamlets character in the Area of Great Landscape Value (AGLV)"*. Furthermore, *"Regard must be given to the outstanding decision to extend the Surrey Hills Area of Outstanding Natural Beauty (AONB) area to Dunsfold. Development should have no significant adverse visual or landscape impact, including protecting key views within Dunsfold and from the adjacent AONB."*
- 9.26 Policy ES01 (Character and Design) and ES02 (Landscape and Visual Impact) reiterate the need to minimise any landscape impact arising from new development, specifically the surrounding countryside supporting the AONB. According to Policy ES01, development proposals on the edge of Dunsfold village are required to *"sensitively connect and integrate with the landscape character surrounding the development"*. The importance of maintaining and enhancing the local and wider landscape is further detailed in Policy ES03 (Design Standards), which sets out design principles to be adhered to, supported by the Dunsfold Design Statement (2001).
- 9.27 Another specific design requirement includes preventing light pollution and protecting the night-time views of the Surrey Hills AONB and the neighbouring South Downs National Park. This requirement is set through Policy NE04 (Light Pollution and Dark Skies).
- 9.28 Given the landscape designations present, the DNP requires that consideration is given to the distinctive, local landscape when locating development within the plan area. Policy PP02 (Spatial Development of Dunsfold) defines the settlement area for Dunsfold, and states that development proposals outside the settlement area will only be permitted where it *"would not be significantly*



*visually intrusive in the landscape*". Policy PP02 ensures future development is focussed on the existing urban area, protecting the valued rural village feel, and supporting appropriate infill and redevelopment over the plan period.

- 9.29 Much of the wider policy framework supplements Policy PP01 and Policy PP02, providing protection to the high-quality local landscape. Notable policies in this respect include Policy ES02 (Landscape and Visual Impact) and Policy ES09 (Areas of Strategic Visual Importance), helping to conserve and enhance the local village character and wider important features of the Surrey Hills. Together these policies perform positively in terms of meeting housing objective H5, which sets out *"to ensure that the design and layout of housing reflects the character of the local built environment, maintains the rural nature of Dunsfold and protects the local landscape"*.
- 9.30 Another key consideration is the planned new garden village on Dunsfold Aerodrome (Dunsfold Park), which lies partly in Dunsfold and partly in the Parish of Alfold. While the draft masterplan allocates most of the portion within Dunsfold to be part of the proposed Country Park, the proposed 'garden village' is within 700 metres of the settlement boundary and some Dunsfold Park housing will fall within the current Parish boundary.
- 9.31 In response to the above, Policy PP03 (To prevent coalescence of Dunsfold settlement with Dunsfold Park) limits development within Dunsfold settlement and the Dunsfold Park Green Gap (as shown within Figure 4.2 of the DNP), with exceptions being only when the *"open or undeveloped character of the gap would not be adversely affected"* and when the *"separate identity (physical and visual perception) of Dunsfold settlement from Dunsfold Park would not be harmed"*. It is considered that this policy, along with those discussed above, will appropriately manage development proposals that may risk undermining the special character of the landscape and visual integrity of the settlement and wider neighbourhood area.
- 9.32 Furthermore, in terms of the DNP allocations, sites generally perform well from a landscape perspective by avoiding the Green Gap. Site allocations proposed are a mix of previously developed land and land not currently used for agriculture within and on the edge of Dunsfold village. However, all sites are within the AGLV, and therefore these sites, particularly those on the settlement edge, may need to consider the role of tree / plantation screening, re-providing this as necessary.
- 9.33 Due to the above, it is recommended that the site allocation policies be updated to reflect this requirement to avoid any adverse effects on the landscape. Effective screening can support the protection of sensitive landscape character areas surrounding the settlement, whilst protecting the identity of the village.
- 9.34 It is also worth noting that any potential residual effects of development on the landscape to the east (i.e., eastwardly views) may differ in the longer term resulting from the Dunsfold Park strategic development.
- 9.35 Overall, assuming the recommendation set out above is adopted, **neutral effects** are considered regarding the landscape SEA topic. This is given the low level of growth proposed (series of very small sites, which will be dwarfed by Dunsfold Park), and high level of protection provided through the DNP policy framework, supplemented by the AONB management plan and LPP1.

## Historic environment

- 9.36 Dunsfold Village is a historic rural village within an agricultural setting. There are more than 50 listed buildings present within the neighbourhood area, largely concentrated in the Dunsfold Conservation Area; with a second conservation area (Dunsfold Church) designated around St Mary's Church at Church Road.
- 9.37 In terms of the site allocations, the Alehouse is the only site constrained by heritage assets. This site falls within a conservation area and adjoins several listed buildings. It is considered that development of the site has the potential to lead to adverse effects on the intrinsic qualities of these assets.
- 9.38 In response to this, Policy HA1 (Alehouse) outlines that any proposal for this site must reflect the constraints arising from the nearby listed buildings and conservation area, which could be through a lower density of housing. It is also recognised that the site is relatively small and well located in terms of existing built development, and therefore impacts on surrounding heritage assets are likely to be limited.
- 9.39 It is noted that the wider policy framework sets plan-area wide requirements through Policy ES07 (Heritage Assets). Specifically, Policy ES07 states that *"Proposals which would cause substantial harm to the heritage assets will not be permitted unless it can be demonstrated that the substantial public benefits gained would outweigh the loss of or harm to the heritage assets"*.
- 9.40 Where development is permitted, Policy ES01 (Character and Design) seeks to ensure proposals relate to the specific local character of Dunsfold and respect the rural nature of the parish and surrounding areas. In addition to this, the landscape and building design guidance set out within the Dunsfold Village Design Statement forms part of the DNP, setting out design principles to inform both the design and decision-making process.
- 9.41 The importance of the Dunsfold Village Design Statement in shaping the growth of the parish is reiterated through the wider DNP policy framework, notably Policy ES03 (Design Standards) and Policy ES05 (Public Realm). The latter sets out numerous design requirements for changes to the existing public realm, for example, ensuring *"design takes account of the established character and quality of materials in Dunsfold"* and *"attractive, safe and, where appropriate, vibrant streets which provide visual interest"*. This reflects the weight placed on the importance of creating well-designed beautiful places within the NPPF (2021), building upon key messages set out within the National Design Guide (2020) and subsequent design Code (2021).
- 9.42 Overall, in light of the wider DNP policy requirements and level of growth proposed through the DNP, residual **neutral effects** are predicted for the historic environment SEA topic.

## Land, soil, and water resources

- 9.43 According to the agricultural land classification (ALC) map for London and the South East<sup>13</sup>, the neighbourhood area is predominantly underlain by Grade 3

<sup>13</sup> Natural England (2010): 'Agricultural Land Classification map London and the South East (ALC007)', [online] available to access via [this link](#)



(good to moderate) agricultural land. However, this land has a low likelihood of being best and most versatile (BMV) land (less than 20% area), apart from a small area surrounding the settlement of Dunsfold which has a moderate likelihood of being BMV land (20 to 60% area)<sup>14</sup>.

- 9.44 From the offset, the DNP enforces the importance of agricultural land in the neighbourhood area, with core planning principle PP6 stating that the plan seeks *"to maintain the rural nature of the Parish, with important agricultural and equestrian land protected"*.
- 9.45 Policy HO3 (Windfall Sites) supports brownfield development, stating that *"residential development provided on infill sites and through the redevelopment of brownfield sites will be supported on land within the settlement boundary"*. Adding to this, Policy PP02 (Spatial Development of Dunsfold) outlines that development proposals that are outside the settlement boundary will only be permitted where they are *"on 'previously development land'"*.
- 9.46 Housing allocations HA3 (Wetwood Farm) and HA4 (The Orchard) both partially cover brownfield land, specifically redundant agricultural buildings, and warehouse buildings and a car park, respectively. However, housing allocations HA1 (Alehouse), HA2 (Coombebury) and HA5 (Springfield) will result in the loss of greenfield land, and HA5 will result in the loss of potential agricultural land as its soil type is well-suited to agricultural use.
- 9.47 It is considered that any issues surrounding water resources, including wastewater treatment, will be a matter for Thames Water. The Water Resources Management Plan (WRMP), published in 2019<sup>15</sup>, sets out how water supply and demand will be balanced over the next 80 years, ensuring an adequate supply to homes whilst protecting the environment. The DNP policy framework supports specific design opportunities in this respect, notably Policy NEO4 (Flood Risk, Sustainable Drainage Systems and Water Management), Policy ES08 (Sustainable Design) and Policy ID06 (Wastewater Capacity).
- 9.48 Specifically, Policy ES08 (Sustainable Design) states that development proposals will be encouraged to achieve the highest level of sustainable design, which includes *"incorporating greywater, rainwater harvesting and other measures to reduce water consumption below 110 litres per person per day"*.
- 9.49 In terms of the housing allocations, all five policies (HA1 to HA5) state that *"development proposals will need to be accompanied by evidence confirming that wastewater can be either disposed of on-site or that there is sufficient capacity within the wastewater network"*.
- 9.50 Considering the above, it is likely that the policy framework set out in the draft DNP will result in **neutral effects** for the land, soil and water SEA topic. This is because, although measures are in place to avoid the loss of agricultural and / or greenfield land where possible, development will inevitably result in the loss of some of this type of land due to the limited availability of brownfield land in the neighbourhood area.

<sup>14</sup> Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map London and the South East (ALC019)', [online] available to access via [this link](#)

<sup>15</sup> Thames Water (2019): 'Water Resources Management Plan 2019', [online] available to access via [this link](#)

## Population and community

- 9.51 The strategic context provided by the Waverley Local Plan seeks significant growth both within Dunsfold and surrounding it at the new Dunsfold Park strategic development site. The growth anticipated within the village is significantly higher than previous rates, though much has already been committed. It is recognised that the village lacks in supporting infrastructure and the further prospect of drilling within the Parish has added to local concerns for the future of Dunsfold. In addition to poor transport links, the Parish faces significant wastewater treatment constraints, an unreliable electricity supply, and poor mobile signal and broadband speeds.
- 9.52 In this respect, the DNP is being locally promoted for its potential to guide development, protect local employment, and help preserve the village character as well as community spirit and village life. Much of this is through the determination of an appropriate growth strategy for Dunsfold, but also through the proposed new 'green gap' which will maintain a degree of separation between Dunsfold and the new settlement at Dunsfold Park (Policy PP03).
- 9.53 Policy HO1 (Provision of housing) outlines the neighbourhood area's housing provision, which will deliver at least 100 net additional dwellings during the period 2013 to 2032. Of these 100 dwellings, 68 have already been completed or committed to, which leaves at least 32 across the five site allocations (covered by policies HA1 to HA5). Policy HO1 supports proposals for residential developments at these sites, provided it is in accordance with the policies contained within the DNP and the Development Plan.
- 9.54 Together the site allocations in the DNP (along with existing completions and commitments) meet and slightly exceed the housing target set by the Waverley Local Plan to provide an element of flexibility in deliverability across the sites. In this respect, positive effects are anticipated in planning for, and identifying land to accommodate new homes for, the forecasted future population growth. These sites have been explored with the community to date to develop a locally acceptable growth strategy.
- 9.55 Regarding growth outside of the proposed allocation sites, Policy PP02 (Spatial development of Dunsfold) defines the type of development that should occur outside of the defined settlement area. That being development which is intrinsic to and in keeping with the rural character and nature of this area.
- 9.56 The Plan recognises the Parish as relatively rare in its polycentric form, in that the settlement area is a focus for built form but there is a distinct and definable network of interlinked hamlets. With the defined Dunsfold settlement area tightly bound, accommodating the required growth presents challenges.
- 9.57 However, cumulative benefits are also associated with Dunsfold Park, which could in the next Plan period see further expansion, putting houses within the Parish boundary and reducing the need for further development within the Dunsfold settlement area.
- 9.58 From the outset, DNP Policy PP01 (Core Planning Principles) sets the tone for development, with the expectation that it preserves *"the Parish's intrinsic beauty and network of rural villages and hamlets character"*.

- 9.59 The Plan seeks delivery of a broad mix of housing sizes, as well as a housing mix that delivers an appropriate number of affordable houses, through Policy HO4 (Mix of Housing Size). Development at Alehouse (Policy HA1) is also set to deliver four new retirement homes.
- 9.60 Furthermore, design policies seek to maintain rural character, for example through appropriately low housing density levels. The Plan identifies that the density of housing in the village is around 12 dwellings per hectare (dph), falling to 2dph in the surrounding countryside and hamlets.
- 9.61 Broadband connectivity is a particular issue for Dunsfold, with the DNP recognising that there is poor or no mobile phone signal, especially outside the village, and broadband speed outside of the village is appallingly slow. In response to this, Policy EB03 (Communications) and Policy ID04 (Broadband) outlines plans to enhance the speed of broadband and install Gigabit broadband to the whole Parish, including outside the settlement area, and extend 4G / 5G mobile phone coverage.
- 9.62 Overall, by providing an avenue for community input into an appropriate spatial strategy for growth in Dunsfold, **significant positive effects** are considered likely through implementation of the DNP. These positive effects are further enhanced by DNP policies which seek a range of housing types, tenures and sizes and guide development with locally developed design principles.

## Health and wellbeing

- 9.63 The neighbourhood area is home to a variety of facilities that contribute to the health and wellbeing of residents, including the King George V (KGV) sports club, an 80-acre Common at the heart of the village, miles of footpaths and bridleways, and access to Chiddingfold Forest. However, with the closure of Dunsfold Surgery in 2020, and the local primary school in 2004, the closest surgeries and schools are now in other nearby villages.
- 9.64 Set in an area of relatively low deprivation, the reported good health of residents is considered likely to continue as the village expands. However, road safety remains an issue in the neighbourhood area, with deaths and injuries on roads being significantly higher than the average for England.
- 9.65 In response to this, transport and getting around objective TG3 highlights that need *“to work with Surrey County Council Highways to use all available means to slow traffic and improve the safety for pedestrians, cyclists and equestrians to move around the Parish”*. This will be achieved *“by providing pinch points at all entries to the village and extending speed restrictions on Dunsfold Road, Alfold, Plaistow and Chiddingfold Roads”*.
- 9.66 In addition to this, Policy TG01 (Highways and Traffic Calming) encourages *“measures that maintain and enhance safety for all road users, especially non-motorised”*. Furthermore, Policy TG02 (Sustainable Transport) supports *“upgrades to existing highways that improve safety”*.
- 9.67 Dunsfold benefits from an extensive network of footpaths and bridleways, and the DNP sets out an infrastructure priority for improvements and extensions to footpaths and bridleways. Adding to this, Policy TG01 (Highways and Traffic Calming) supports proposals that enhance existing and provide new footpaths, bridleways and cycle routes within the neighbourhood area.

- 9.68 Policy ES05 (Public Realm) highlights that development proposals should contribute to local green infrastructure, and together with Policy TG02 (Sustainable Transport), which supports proposals that introduce routes for walkers, cyclists and mobility scooters, contribute to improved connectivity within the neighbourhood area, contributing to a cohesive community.
- 9.69 Dunsfold has good access to the surrounding countryside, which is of high landscape value, as well as the Common at the heart of the settlement area. Access to green space and nature can improve both mental and physical health, supporting residents' wellbeing. In support of this, environment, sustainability and design objective ES3 states that *“development will provide public and private green spaces that contribute to public health and wellbeing”*.
- 9.70 Policy RL01 (Community and Leisure Facilities) highlights that *“to improve the wellbeing of Dunsfold residents, development proposals comprising the provision of new, or extended community and leisure facilities within the Parish will be supported”*. The policy also supports the protection and enhancement of existing community facilities, which are vital for community vitality.
- 9.71 Regarding health facilities, Policy ID02 (Dunsfold Surgery) of the DNP supports proposals to reopen the Dunsfold Surgery and increase its capacity. This will have positive knock-on effects for the health and wellbeing of residents, who will be able to travel to the surgery via modes of active travel.
- 9.72 Regarding the housing allocations, Alehouse (Policy HA1) delivers retirement dwellings, which will support the wellbeing of older people in the neighbourhood area through housing that meets their specific needs.
- 9.73 Overall, it is considered that the low level of growth proposed through the DNP is unlikely to significantly impact on access to healthcare services or accessibility within and around the village. The DNP supports development that enhances access to green spaces and green infrastructure networks, as well as improvements to active travel routes. In this respect, **minor long-term positive effects** are predicted for the health and wellbeing SEA topic.

## Transportation

- 9.74 As a rural location, Dunsfold has a poor public transport network, and local highway capacity is limited. In the absence of strategic transport interventions, it is considered likely that current road capacity constraints will also be exacerbated by the development of Dunsfold Park. Rail capacity is also a constraint, and no significant increase in capacity is anticipated unless Crossrail 2 emerges in the latter stages of the Plan period.
- 9.75 Several policies within the DNP support improvements to transport in the neighbourhood area, including Policy TG01 (Highways and Traffic Calming) which seeks to management the speed of traffic, enhance safety for all road users, and deliver new footpaths, bridleways and cycle routes.
- 9.76 Adding to this, Policy TG02 (Sustainable Transport) supports proposals that deliver routes for walkers, cyclists and mobility scooters in the neighbourhood area, which will have knock-on positive effects on health and wellbeing.
- 9.77 Policy TG03 (Car Parking Standards) will ensure that new development has suitable car and cycle parking provision. The policy also outlines that all car

parking spaces in new developments should be designed to support future installation of electric charging equipment, which will have positive knock-on effects for climate change, particular climate change mitigation.

- 9.78 Policy TG04 (Improved Bus Services) supports proposals that will deliver a coordinated bus service between Dunsfold Village, Dunsfold Park, Horsham, Guildford and Godalming. This is important, as it will decrease residents' reliance on private cars, alleviating current road capacity constraints.
- 9.79 Notably, the pandemic has seen a fall in commuting to the benefit of the local road network, and this new trend is set to continue to some extent. Whilst this may mitigate the effects of growth to a degree, much uncertainty still exists at this stage. In the context of the DNP, it will be important to ensure rural broadband connectivity is good and development is able to facilitate continued homeworking as the settlement grows.
- 9.80 Overall, the small-scale growth proposed through the DNP is not considered likely to lead to any significant negative effects on transport. Nevertheless, the DNP supports improvements to traffic and parking, and aims to deliver better connectivity in terms of active travel and public transport. In this respect, **neutral effects** are concluded for the transportation SEA topic.

## Cumulative effects

- 9.81 The strategic growth in Dunsfold is likely to provide support to some degree for the surrounding settlement areas. For example, through improved access, including access by 'green corridors', and inward investment in the village's infrastructure. In this respect, minor long-term positive cumulative effects can be anticipated. The promotion of biodiversity enhancement across the development sites will support habitat connectivity, which is considered likely to lead to overall net gain and therefore positive cumulative effects.
- 9.82 On the other hand, it is recognised that there will be negative cumulative effects regarding the wider landscape due to the loss of greenfield land and encroachment upon the countryside. In addition to this, cumulatively, designated and non-designated heritage settings are likely to come under pressure from development across the wider area. Nevertheless, the policy provisions of the NPPF, Local Plan and DNP are considered likely to ensure that any cumulative effects are not of significance.
- 9.83 Overall, the provisions of the DNP supplement the provisions of the Waverley Local Plan, as well as the Local Plans of neighbouring districts, to provide additional local protections for assets, features and characteristics of value, and identify opportunities for development to address known issues or deliver community benefits. As a result, overall positive cumulative effects are considered likely.



# 10. Conclusions and recommendations

## Conclusions

- 10.1 Significant positive effects are concluded for the population and community SEA topic as the DNP provides an avenue for community input into an appropriate spatial strategy for growth in Dunsfold. These positive effects are further enhanced by DNP policies which seek a range of housing types, tenures and sizes and guide development with locally developed design principles.
- 10.2 Minor long-term positive effects are considered likely for the biodiversity and geodiversity and health and wellbeing SEA topics. For the prior, this is due to the premise for biodiversity protection, enhancement and net gain embedded through the DNP policy framework. For the latter, this is due because the low level of growth proposed through the DNP is unlikely to significantly impact on access to healthcare services or accessibility within and around the village. Instead, it supports development that enhances access to green spaces and green infrastructure networks, as well as improvements to active travel routes.
- 10.3 Neutral effects are concluded for the climate change, landscape, historic environment, land, soil, and water resources and transportation SEA topics. Regarding climate change, whilst the DNP policy framework supports local and national climate change targets, it is recognised that climate change is a global issue and that the scale of development proposed through the DNP is not anticipated to lead to significant effects. In terms of landscape and the historic environment, neutral effects are concluded due to the low level of growth proposed and high level of protection provided through the DNP policy framework, supplemented by the AONB management plan and LPP1. Regarding land, soil, and water resources, development will inevitably result in the loss of some agricultural and / or greenfield land due to the limited availability of brownfield land in the neighbourhood area. Finally, in terms of transportation, the small-scale growth proposed through the DNP is considered unlikely to lead to any significant negative effects on transport; the DNP also supports improvements to traffic and parking and aims to deliver better connectivity in terms of active travel and public transport.

## Recommendations

- 10.4 The following recommendations have been made following the appraisal of the draft plan:
- Regarding the biodiversity and geodiversity SEA topic, it is recommended that the DNP outlines specifically how the impacts of development on Ancient Woodland will be mitigated. This is because Ancient Woodland covers a large part of the neighbourhood area, which is regarded as a particularly rich habitat for wildlife and the importance of preserving ancient woodland is recognised by the NPPF (Paragraph 175).
  - Regarding the landscape SEA topic, it is recommended that the site allocation policies be updated to reflect the need to consider the role of tree/ plantation screening, including re-provision as necessary.

## **Part 3: What are the next steps?**

# 11. Next steps and monitoring

11.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

## Plan finalisation

11.2 Following consultation, responses received will be considered and the DNP and SEA Environmental Report will be finalised for submission.

11.3 Following submission, the DNP and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the DNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

11.4 If the examination leads to a favourable outcome, the Neighbourhood Plan will then be subject to a referendum, organised by Waverley Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the DNP will become part of the Development Plan for Waverley, covering the defined neighbourhood area.

## Monitoring

11.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

11.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Waverley Borough Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the DNP that would warrant more stringent monitoring over and above that already undertaken by the Council.



# Appendices

# Appendix A Regulatory requirements

As discussed in **Chapter 1**, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table AA-1** overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA-2** explains this interpretation. **Table AA.3** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

**Table AA-1 Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements**

	Questions answered		As per regulations... the Environmental Report must include...
Introduction	What's the plan seeking to achieve?		<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the SEA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
Part 1	What has plan-making / SEA involved up to this point?		<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
Part 2	What are the SEA findings at this current stage?		<ul style="list-style-type: none"> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>
Part 3	What happens next?		<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>

**Table AA-2: Questions answered by this Environmental Report, in-line with regulatory requirements**

<b><u>Schedule 2</u></b>	<b><u>Interpretation of Schedule 2</u></b>	
<b><i>The report must include...</i></b>	<b><i>The report must include...</i></b>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'baseline'?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

**Table AA-3: 'Checklist' of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.**

Regulatory requirement	Discussion of how requirement is met
<b>Schedule 2 of the regulations lists the information to be provided within the SA Report</b>	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What is the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The 'SEA framework' – the outcome of scoping – is presented within Chapter 3 ('What is the scope of the SEA?'). More detailed messages, established through a context and baseline review are also presented in Appendix B of this Environmental Report.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The SEA framework is presented within Chapter 3 ('What is the scope of the SEA'). Also, Appendix B presents key messages from the context review.</p> <p>With regards to explaining "<i>how...considerations have been taken into account</i>", Chapter 7 explains the Steering Group's 'reasons for supporting the preferred approach', i.e., explains how/ why the preferred approach is justified in light of alternatives appraisal.</p>
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	<p>Chapter 6 presents alternatives appraisal findings (in relation to housing growth, which is a 'stand-out' plan policy area).</p> <p>Chapters 9 presents an appraisal of the plan.</p> <p>With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g., timescale.</p>
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	<p>Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options.</p> <p>Also, Chapter 7 explains the Parish Council's 'reasons for selecting the preferred option' (in-light of alternatives assessment).</p>

Regulatory requirement	Discussion of how requirement is met
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.
<b>The SA Report must be published alongside the Draft Plan, in accordance with the following regulations</b>	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	At the current time, this Environmental Report is published alongside the 'pre-submission' version of the Dunsfold Neighbourhood Plan, with a view to informing Regulation 14 consultation.
<b>The SA must be taken into account, alongside consultation responses, when finalising the plan.</b>	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	Assessment findings presented within this Environmental Report, and consultation responses received, have been fed back to the Steering Group and have informed plan finalisation.

