

DUNSFOLD PARISH COUNCIL

Tel: 01483 200980
email: dunsfoldparishclerk@btconnect.com

Unit 3, The Orchard
Chiddingfold Road
Dunsfold
GU8 4PB

5th November 2022

NOTICE OF A PARISH COUNCIL MEETING

Councillors are hereby summoned to attend the meeting of Dunsfold Parish Council to be held in the Winn Hall at **7.30 pm on Thursday 10th November 2022.**

Members of the public are welcome to attend Parish Council meetings and are invited to put questions, relevant to the agenda, to the Council between 8.30 pm and 8.45 pm.

Celeste Lawrence - Clerk to the Council

AGENDA

1. APOLOGIES FOR ABSENCE

Recommendation: To receive apologies for absence.

2. DECLARATIONS OF INTERESTS

Recommendation: To receive any declarations of interest from members in respect of any item to be considered at the meeting and changes to members registered interests.

SUSPEND THE MEETING FOR THE COMMONS COMMITTEE MEETING TO TAKE PLACE

3. RATIFY COMMON COMMITTEE MEETING

Recommendation: The Chairman to report on the proceedings of the Commons Committee meeting held and members to resolve to adopt the recommendations.

4. PARISH COUNCIL MINUTES

Recommendation: To approve the Minutes of the meeting held on 13th October 2022 and the Extraordinary meeting held on 31st October 2022 as a correct record of decisions taken and the Chairman to sign the Minutes.

5. OUTSTANDING ITEMS FROM THE PREVIOUS PARISH COUNCIL MEETING MINUTES

Recommendation: To review any matters outstanding from the previous minutes and record progress.

6. PLANNING NOTIFICATIONS

Attached to agenda.

To receive notification of decisions made by Waverley Borough Council on recent planning applications.

7. PLANNING APPLICATIONS

Recommendation: To consider and AGREE responses to the following planning applications:

Millhanger, Chiddingfold Road, Dunsfold

Application under section 73 to vary condition 5 of wa/2019/1474 (condition requires approval of precommencement landscaping and tree planting scheme) new wording would require compliance with plans approved under this application.

High Billingshurst Farm, High Loxley Road, Loxhill

Application under section 73 to vary condition 13 of WA/2020/1646 (restricts events to 75 per calendar year) to allow 100 events per calendar year.

8. AGREE A DATE FOR NEXT YEARS FETE

Recommendation: To agree a date for the 2023 village fete and King's coronation celebrations.

9. CO-OPTION OF A PARISH COUNCILLOR

Recommendation: In the absence of a call for an election, to decide whether or not to co-opt a suitable parishioner to the council.

10. TW NUGENTS CLOSE LETTER

Circulated separately

Recommendation: To AGREE if the permission sought to access across the common to enable the construction of a new rising main and sewer as an upgrade to the infrastructure.

11. UK POWER NETWORKS WAYLEAVE AGREEMENT COMMON HOUSE, ALFOLD ROAD

Circulated separately

Recommendation: To AGREE if permission sought to make alterations to the electricity network.

12. COOMBURY COTTAGE PRE-APPLICATION CONSULTATION ON PROPOSED COMMON LAND WORKS

Letter attached to this agenda.

Recommendation: To consider a response with regards to works being proposed to Dunsfold Common in relation to a forthcoming outline planning application for up to 53 houses. Comments due by 11th November.

13. NEIGHBOURHOOD PLAN

Waverley's response attached to this agenda.

To note Waverley Borough Council's comments on the draft Plan.

14. WAVERLEY BOROUGH COUNCIL

To receive a report on matters from Waverley Borough Council

15. SURREY COUNTY COUNCIL

To receive a report on matters from Surrey County Council.

16. CORRESPONDENCE

Recommendation: To receive and consider any correspondence.

17. RECEIPTS AND PAYMENTS

Recommendation: To receive accounts for payment.

18. FUTURE AGENDAS

Recommendation: To receive items of business for information or inclusion on a future agenda.

19. PRESS AND PUBLIC

Exclusion of press and public in accordance with section 100A (2) and (4) of the LGA 1972 if required.

DUNSFOLD PARISH COUNCIL

Tel: 01483 200980

email: dunsfoldparishclerk@btconnect.com

4th November 2022

Unit 3, The Orchard

Chiddingfold Road

GU8 4PB

NOTICE OF A MEETING OF THE COMMONS COMMITTEE

Members of the Commons Committee are summoned to attend a meeting of the Commons Committee to be held at **7.30pm on Thursday 10th November 2022 in the Nugent Room of the Winn Hall, Dunsfold.**

Celeste Lawrence
Clerk to the Council

AGENDA

1. APOLOGIES FOR ABSENCE

Recommendation: To receive apologies for absence.

2. MINUTES

Recommendation: To receive for confirmation the Minutes of the Meeting held on 13th October 2022.

3. REVIEW OF ACTIONS FROM THE PREVIOUS MEETING MINUTES

Recommendation: To review any matters outstanding from the previous minutes and record progress.

4. REPORT FROM THE CHAIRMAN OF THE COMMONS STEERING GROUP

Recommendation: To receive a report from the Chairman of the Commons Steering Group.

5. S106 MONIES

Recommendation: To receive a report on tree works being done with the S106 monies.

6. WOODLAND AND POND MANAGEMENT PROGRAMME

Recommendation: To receive a report on the progress of the management plan.

7. COMMON AREA ISSUES

Recommendation: To consider any other issues relating to the Common area.

Notice from Waverley website:

"Technical issues with Planning system

Due to a technical issue, our planning system is currently not updating applications on our public planning register.

We are working to resolve this and will ensure all records are updated as soon as possible. If you need to check on an application, please contact our Customer Services Centre on 01483 523583 between 8.45am and 5.15pm (Monday to Thursday), 8.45am - 4.45pm (Friday).

We apologise for any inconvenience caused. "

WA/2019/1464 - 7 BURNT HILL PLAISTOW ROAD, GODALMING, GU8 4PG

Use of land as a residential gypsy caravan site for siting 12 static caravans and erection of amenity building.

Decision: Pending Appeal notice 3rd October

WA/2021/0119 - Ashdown, Chiddingfold Road, Dunsfold, GU8 4PB

Erection of two storey extension including alterations to chimney.

Decision: Refused (decision notice 2nd June, WBC website not updated)

WA/2021/02308 - Land South of Dunsfold Road and East of High Loxley Road, Godalming, GU8 4BW

Erection of cattle finishing unit.

Decision: Appeal

WA/2021/02581 - South Fork, Wrotham Hill, Dunsfold

Certificate of lawfulness under section 192 for the siting of a caravan for use ancillary to agriculture.

Decision: Pending

WA/2021/03164 - Wetwood Farm, Chiddingfold Road, Dunsfold, GU8 4PB

Demolition of existing buildings and construction of 12 dwellings with associated access parking and amenity areas (as amplified by ecological information submitted 04/01/2022 and archaeological assessment submitted 05/01/2022).

Decision: Pending

WA/2021/03081 - Land Centred Coordinates 500833 137030, The Green, Dunsfold

Outline application with all matters reserved except for access for erection of 5 dwellings and associated works including vehicle access.

Decision: Appeal

WA/2022/03255 - Land centred coordinates 501563 137208 High Loxley Road, Loxley

Erection of agricultural worker's dwelling and ancillary farm outbuilding.

Decision: Granted on 10th October with 14 conditions

WA/2022/01008 - Old Kennels Cottage, The Green, Dunsfold, GU8 4NB

Certificate of lawfulness under section 191 to confirm the lawfulness of the annexe extension and glazed link which connects it to the house the annexe and link were completed more than four years ago.

Decision: Pending

WA/2022/01127 - Willards Garden Cottage, The Common, Dunsfold, GU8 4LB

Erection of a dwelling following demolition of existing dwelling.

Decision: Pending

WA/2022/01496 - Ashdown, Chiddingfold Road, Dunsfold, GU8 4PB

Erection of ancillary outbuilding and demolition of existing buildings.

Decision: Pending

WA/2022/01395 - Ashdown, Chiddingfold Road, Dunsfold, GU8 4PB

Erection of fencing gates and piers.
Decision: Pending

WA/2022/01469 - HRM Polo, Burningfold Manor, Plaistow Road
Change of use of existing stables with associated internal and external alterations to provide 3 residential dwellings.
Decision: Pending

WA/2022/01654 - High Loxley Farm, Dunsfold Road, Loxhill, GU8 4BW
Listed building consent for the erection of stables and alterations following demolition of existing stables.
Decision: Pending

WA/2022/01653 - High Loxley Farm, Dunsfold Road, Loxhill, GU8 4BW
Erection of stables and alterations to access road following demolition of existing stables.
Decision: Pending

WA/2022/01781 - High Loxley Farm, Dunsfold Road, Loxhill, GU8 4BW
Listed building consent for alterations to an existing agricultural building to form ancillary residential accommodation for rural workers.
Decision: Pending

WA/2022/01780 - High Loxley Farm, Dunsfold Road, Loxhill, GU8 4BW
Alterations to an existing agricultural building to form ancillary residential accommodation for rural workers.
Decision: Pending

WA/2022/01825 - High Loxley Farm, Dunsfold Road, Loxhill, GU8 4BW
Erection of extensions and alterations to existing agricultural barn (west) to provide a residential dwelling (use classc3) following demolition of existing tractor barn; alterations to existing agricultural barn (east) to provide ancillary residential accommodation; erection of a detached outbuilding to provide garage and home office.
Decision: Pending

WA/2022/01824 - High Loxley Farm, Dunsfold Road, Loxhill, GU8 4BW
Listed building consent for erection of extensions and alterations to existing agricultural barn (west) to provide a residential dwelling (use classc3) following demolition of existing tractor barn; alterations to existing agricultural barn (east) to provide ancillary residential accommodation; erection of a detached outbuilding to provide garage and home office.
Decision: Pending

WA/2022/02197 - 2 New Inn Cottages, The Common, Dunsfold GU8 4LL
Erection of a single storey extension (revision of WA/2022/00925).
WA/2022/02196 - 2 New Inn Cottages, The Common, Dunsfold GU8 4LL
Listed building consent for erection of a single storey extension.
Decision: Pending

WA/2022/02153 - 2 King George V Cottages, The Green, Dunsfold GU8 4LY
Erection of extensions and alterations.
Decision: Pending

WA/2022/02146 - Millhanger, Chiddingfold Road, Dunsfold
Application under section 73 to vary condition 21 of WA/2019/1474 (sustainability development measures) to supersede with revised sustainability statement.
Decision: Pending

WA/2022/02373 - Wetwood Farm, Chiddingfold Road, Dunsfold, GU8 4PB
Erection of 12 dwellings and associated works including vehicular access parking and carports following

demolition of existing buildings and removal of hardstanding.

Decision: Pending

S52/2022/02266 - Land Centred Coordinates 500866 135914 Alfold Road, Dunsfold

Request to modify a section 52/106 legal agreement (wa/2017/1815) requires changes to the out of date mortgagee in possession clause and any associated clauses to be amended.

Note: The s106 Agreement and Nominations Agreement have been added to the Waverley website. Clerk to email officer to ask for the Deed of Variation to be published.

Decision: Pending

WA/2022/02476 - Wrotham Hill Cottage, Wrotham Hill, Dunsfold, GU8 4PA

Certificate of lawfulness under section 191 for use of roofspace of the garage building for the purposes of habitable accommodation.

Decision: Pending

PRA/2022/02487 - Land Adjacent to 1 Durfold Cottages, Fisher Lane, Dunsfold

General permitted development order 2015 schedule 2 part 6 -prior notification application for erection of a forestry hut.

Decision: Refuse not permitted development

NMA/2022/02479 - South View, The Green, Dunsfold, GU8 4LZ

Amendment to WA/2022/01098 - minor alteration to roof to create gable rather than a parapet on the rear elevation.

Decision: Pending

WA/2022/02373 - Wetwood Farm, Chiddingfold Road, Dunsfold, GU8 4PB

Erection of 12 dwellings and associated works including vehicular access parking and carports following demolition of existing buildings and removal of hardstanding.

Decision: Pending

Burnt Hill, 7 Plaistow Road, Dunsfold, GU8 4PG

Full notice circulated separately

An enforcement appeal against an Enforcement Notice dated 26/07/2022 issued by Waverley Borough Council has been lodged with the Planning Inspectorate, by Mrs Sally Ann Bibby.

The Enforcement Notice appeal reference is **APP/R3650/C/22/3305965**.

Decision: It was agreed that the Clerk email the Waverley enforcement team to offer DPC assistance as required.

Extraordinary meeting held 31st October. DPC to submit agreed comments



Waverley Borough Council
Council Offices, The Burys,
Godalming, Surrey
GU7 1HR
www.waverley.gov.uk

BY EMAIL ONLY

dunsfoldparishclerk@btconnect.com

Andrew Longley

Interim Planning Policy Manager

E-mail: planningpolicy@waverley.gov.uk

Direct line: 01483 523291

Date: 3rd October 2022

Dear Ms Lawrence,

Dunsfold Neighbourhood Plan Regulation 14 Consultation

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

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

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

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

Yours sincerely,

Andrew Longley

Interim Planning Policy Manager



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



CONSULTATION ON A FORTHCOMING COMMON LAND CONSENT APPLICATION

SUPPORTING STATEMENT

Application under Section 38 of the Commons Act 2006, as amended, for consent to construct works on common land (Dunsfold Common)

Site Address:

Land at Coombebury Cottage
Dunsfold Common Road
Dunsfold
Surrey
GU8 4NB

October 2022

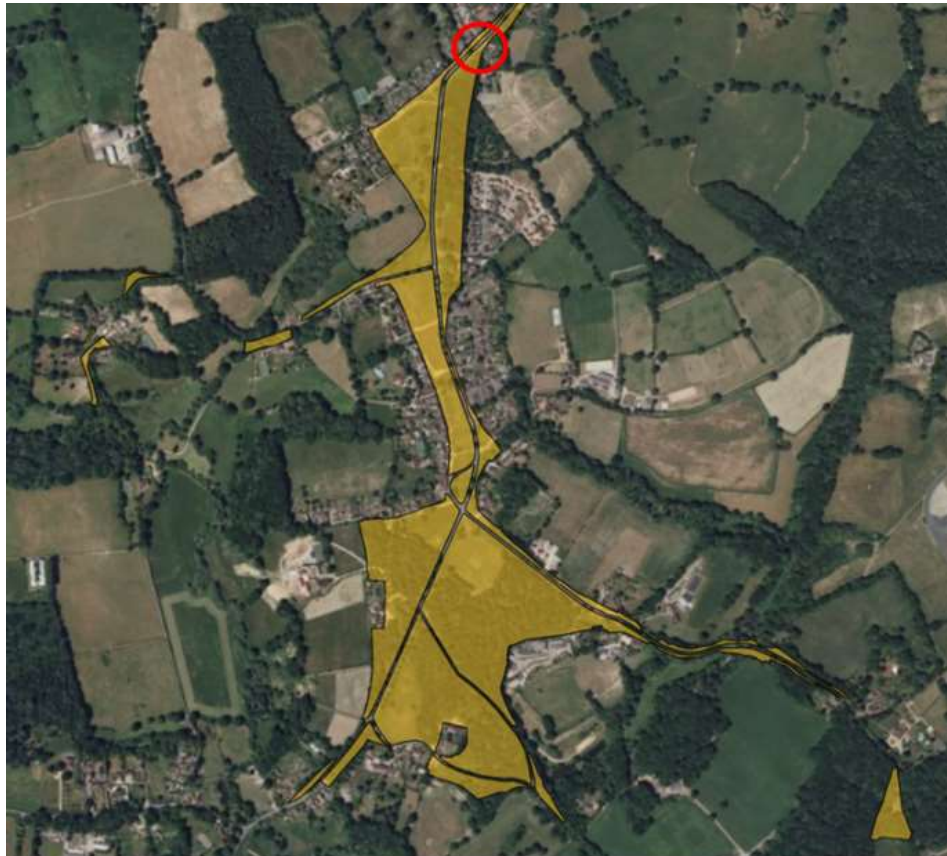
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1 INTRODUCTION

- 1.1 This Supporting Statement has been prepared to provide background information on the forthcoming application to be submitted under Section 38 of the Commons Act 2006, as amended, for works to land at Dunsfold Common, Dunsfold, Surrey.
- 1.2 The application will relate to an existing access, hereafter referred to as 'the site', located towards the northern end of the Registered Common Land which runs through Dunsfold village, before continuing further north. The Common Land is highlighted in yellow in **Figure 1.1** below, with the site circled in red.
- 1.3 This application will be submitted in tandem with an Outline Planning Application that will be submitted to Waverley Borough Council for approximately 53 residential dwellings, public open space, parking and landscaping on land at Coombebury Cottage. The proposed works are associated with the creation of an upgraded access into the site and the provision of footpaths either side of the access. Further details of the proposed development are provided within this report.

Figure 1.1 – Location of the Common Land (Source: Land App using Bing Imagery)



Application Documents

1.4 The following documentation will be submitted as part of the Common Land Consent application:

- Application Form and Health and Safety Questionnaire;
- Confirmation of Notification;
- Copy of the Commons Register;
- Two copies of an up-to-date map showing the works proposed;
- Supporting Statement; and
- Details of the proposed residential development, including detailed drawings for the proposed upgraded access.

Notification

1.5 This Supporting Statement has been prepared to inform an initial, private consultation on the proposal, prior to the submission of the Common Land application. Upon submission, the application will be advertised as required by legislation in the following ways:

- The application will be advertised at the main entrance to the site and will be displayed for a minimum of 28 days from date on which it is displayed.
- The application will be advertised in a local paper, such as Surrey Live or Get Surrey.
- The applicant will write to the following organisations to notify them of the submission:
 - Waverley Borough Council, as the registered owner of the land and the local planning authority;
 - Dunsfold Parish Council, as the Parish Council and also to ensure notification of all expected active Commoners living in the village;
 - Surrey County Council, as the Commons Registration Authority;
 - Natural England;
 - Historic England;
 - Open Spaces Society; and
 - Surrey County Council Archaeological Officer.
- Occupiers of all properties shown on the Commons Register as having rights of common attached to it.

2 SITE DESCRIPTION AND BACKGROUND

- 2.1 The application will relate to an area of land on the northern end of Dunsfold which comprises a residential access track leading to Coombebury Cottage, together with surrounding amenity grass and trees. The area registered as Common Land is bounded by Dunsfold Common Road to the west and the entrance gate to Coombebury Cottage marks the eastern boundary, as shown in **Figure 2.1** below.
- 2.2 The track is also a public footpath which runs eastwards towards High Loxley Road.

Figure 2.1 – Google Street View photograph of the existing access

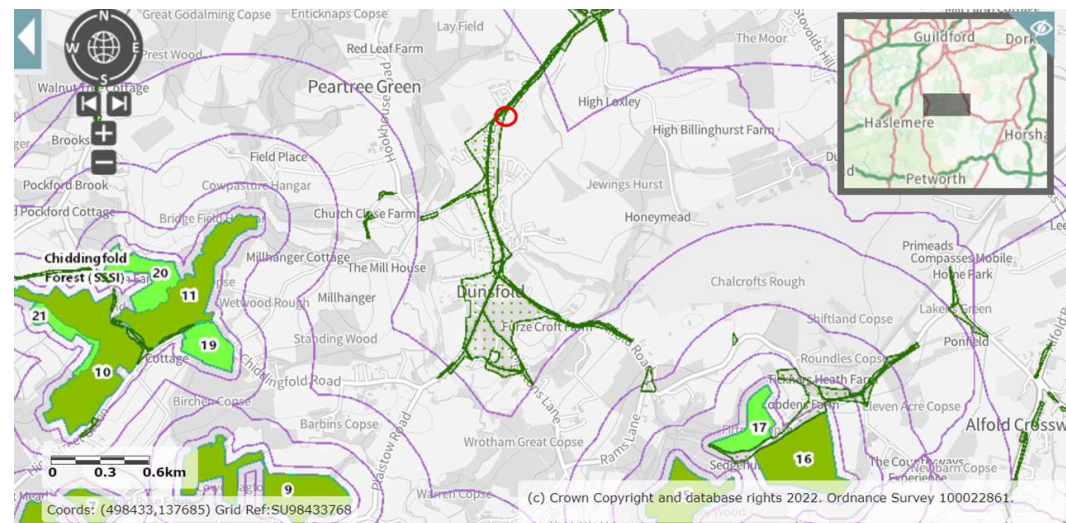


- 2.3 The existing driveway is comprised of at-grade concrete hardstanding with a grass strip either side and woodland beyond.
- 2.4 A Tree Survey has been undertaken which has identified a mix of tree species either side of the existing driveway, comprising English Oak, Ash, Pear and Western Red Cedar. The Ash tree has been infected with ash dieback disease and is recommended for removal. The Western Red Cedar identified as heavily suppressed, and its removal would benefit future growth of the healthier trees in the vicinity. All other trees are recommended for retention and their quality ranges from Category A to Category C. These findings have been reflected on the proposed plans.

Environmental Designations

- 2.5 The site is not located within or in close proximity to any national statutory environmental designations, as shown in **Figure 2.2** below. The nearest protected site is the Chiddingfold Forest SSSI which covers areas approximately 2.3km to the south east and 1.65km to the west. The site lies in the SSSI impact risk zone as shown in purple.

Figure 2.2 – Extract of the Natural England's MAGIC mapping software, showing statutory designations



- 2.6 The area of Common Land covering the site is identified by MAGIC as Woodpasture and Parkland BAP Priority Habitat which lies on the east and west sides of Dunsfold Common Road and Priority Habitat (Deciduous Woodland) on the east side, as shown in **Figure 2.3**.
- 2.7 The Waverley Local Planning Map shows the site as part of a wider Site of Nature Conservation Importance, as known as a 'local wildlife site', as shown in orange in **Figure 2.4**.

Figure 2.3 - Extract of the Natural England's MAGIC mapping software, showing nearby habitats



Figure 2.4 - Extract of the Waverley Planning Map



Heritage Designations

- 2.8 There are five listed buildings within the vicinity of the site, as shown in **Figure 2.5** below. There is also a Building of Local Merit located opposite the site entrance on Dunsfold Common Road, known as Dunsfold Grange, which is a non-designated heritage asset.
- 2.9 There are no Scheduled Monuments in the area and the site does not lie within an Area of High Archaeological Potential or County Site of Archaeological Importance.

Figure 2.5 – Nearby listed buildings (Base Map: Bing Imagery)



Planning History and Context

- 2.10 The application will be submitted in tandem with an outline planning application for the demolition of existing buildings and structures and the erection of approximately 53 residential dwellings (Use Class C3), together with associated access, parking, landscaping and the creation of public open space and play areas.
- 2.11 The proposed access will utilise the existing entrance and access track to Coombebury Cottage. Both will require upgrading in order to support the proposed development and to align with highway standards stipulated in the Department for Transport's Manual for Streets. The works required are set out in Section 4 of this report.
- 2.12 The table below sets out a number of other applications for this site.

REFERENCE	PROPOSAL	DECISION
HM/R11732	Site for agricultural dwelling for occupation in connection with Pound Farm.	Approved 17/01/1961
HM/R13844	Double garage and stable (sectional)	Approved 15/11/1963
WA/1993/0533	Application for a Certificate of Lawfulness for the continued occupation of dwelling without compliance with condition (ii) (agricultural occupancy) of HM/R 11732.	Approved 02/07/1993
WA/1998/0776	Alterations and extensions to existing chalet bungalow to provide a two storey dwelling.	Refused 17/07/1998
WA/1998/1970	Erection of extensions and alterations (revision of WA/1998/0776) (as amplified by letter dated 09/01/99).	Approved 04/02/1999
WA/2004/0132	Erection of outbuilding to provide garage, stables and garden room following demolition of exiting stables.	Withdrawn 18/03/2004
WA/2004/1266	Erection of replacement garage and stable/sheds following demolition of existing.	Approved 19/07/2004
NMA/2011/0075	Amendment to WA/2004/1266 to reduce the size of the stable building, relocation of openings on southern elevation and internal partitions.	Approved 14/07/2011
WA/2011/1533	Certificate of Lawfulness under Section 191 for the change of use of land for equestrian purposes and the erection of a sound school.	Approved 10/01/2012

3 LEGISLATIVE BACKGROUND

Commons Act 2006

- 3.1 Section 38 of the Commons Act 2006, as amended (hereafter referred to as “the Commons Act”), states that a person may not, except with the consent of the appropriate national authority, carry out any restricted works on land to which the section applies i.e. Common Land.
- 3.2 Section 38(2) states that “restricted works” comprise:
- Works which have the effect of preventing or impeding access to or over the land. This includes in particular the erection of fencing; the construction of buildings and other structures; and the digging of ditches and trenches and the building of embankments.
 - Works for the resurfacing of land. This includes the laying of concrete, tarmacadam, coated roadstone or similar material on the land (but not if they consist only of the repair of an existing surface of the land made of such material).
- 3.3 Section 38(6) sets out works that are not prohibited by this section:
- Works on any land where those works, or works of a description which includes those works, are carried out under a power conferred in relation to that particular land by or under any enactment.
 - Works on any land where the works are carried out under a power conferred by or under any enactment applying to common land.
 - Works authorised under a scheme under the Metropolitan Commons Act 1866 or the Commons Act 1899 without any requirement for any person to consent to the works;
 - Works for the installation of electronic communications apparatus for the purposes of an electronic communications code network.
- 3.4 The proposal will result in the resurfacing of Common Land to form a wider access road including pavements, and new sections of footpath either side of the access alongside Dunsfold Common Road. None of the exemptions in Section 38(6) will apply. Common Land Consent under Section 38 will therefore be required.
- 3.5 Section 39(1) states that in determining an application for consent under subsection (1) of section 38, the appropriate national authority shall have regard to—

- The interests of persons having rights in relation to, or occupying, the land (and in particular persons exercising rights of common over it).
- The interests of the neighbourhood.
- The public interest (clarified in Section 39(2) as including nature conservation, the conservation of the landscape, protection of public rights of access to any area of land, and the protection of archaeological remains and features of historic interest).
- Any other matter considered to be relevant.

3.6 Section 39(3) confirms that consent may be given in relation to all or part of the works, or subject to modifications and conditions as seen appropriate by the national authority.

DEFRA Common Land Consents Policy (2015)

3.7 The Common Land Consents Policy states that the Commons Act 2006 seeks to:

- Safeguard commons for current and future generations to enjoy;
- Ensure that the special qualities of common land, including its open and unenclosed nature, are properly protected; and
- Improve the contribution of common land to enhancing biodiversity and conserving wildlife.

3.8 It also seeks to ensure that any use of common land or green is consistent with its status so that works take place on common land only where they maintain or improve the condition of the common or where they confer some wider public benefit and are either temporary in duration or have no significant or lasting impact.

3.9 It also confirms in Paragraph 4.3 that the Secretary of State will wish to know what alternatives have been considered to the application proposal.

4 PROPOSED WORKS

- 4.1 As noted previously in this report, the proposed works are associated with a forthcoming outline planning application that will be submitted to Waverley Borough Council for the demolition of Coombebury Cottage and the erection of approximately 53 residential dwellings in the area identified in **Figure 4.1** below.
- 4.2 The applicant and their project team have worked hard to create a development that is in keeping with the village location. Traditional design features and materials would be used to reflect its semi-rural location.
- 4.3 The proposed works to the Common Land are necessary to provide access to the development that meets highways standards set out in Manual for Streets.

Figure 4.1 – Indicative Layout Plan



Location of the Proposed Works

- 4.4 The area of Common Land affected by the proposals extends to 300.5 sqm and stretches from Dunsfold Common Road to the boundary of Coombebury Cottage. It currently comprises an

existing concrete residential driveway with strips of amenity grass either side, and grass verge.

Figure 4.2 – Area of Common Land affected by the proposals (hatched black)



Description of the Proposed Works (Including Materials)

4.5 The works proposed to the existing common land area will involve:

- The removal of the existing concrete surfacing and the creation of a 5.5 metre, two-way access road composed of a permeable no-dig Cellweb sub-base with surfacing and kerbing.
- The creation of a 2m wide footway on the southern side of the access to provide a right of way into the new neighbourhood and to access the existing footpath which runs along the northern boundary of the site.
- The provision of an uncontrolled dropped-kerb tactile crossing point for the new connection to the public footpath, and a tactile crossing at the proposed access.
- The creation of a 2m wide new footway on the east side of Dunsfold Common Road connecting to the existing footway to the south and bus stop to the north.
- The creation of a defined access radius to facilitate turning onto Dunsfold Common Road.

- The removal of the existing entrance gate to Coombebury Cottage and partial removal of the boundary fence to accommodate the widened access.
- The removal of trees adjacent to the access. A full Tree Survey will be submitted with the application.

4.6 The works will be permanent.

4.7 None of the proposed works will reduce the area of Common Land.

4.8 No works as proposed and described in this report have been undertaken to date.

Protecting, Maintaining, and Improving the Common Land

4.9 From the outset, the design team has worked hard to draw up plans that would have as minimal impact on the Common Land as possible. This led to the development of three key objectives.

- **Objective 1** – To identify a method of construction that would ensure that the underlying root network of nearby trees is not impacted by the proposed works and ensures their ongoing health.
- **Objective 2** – To limit any tree and vegetation removal to those trees as far as possible.
- **Objective 3** – To protect and enhance the experience of the right of way and Common Land for active users.

4.10 These objectives are discussed in turn below.

Objective 1 – Access Construction

4.11 The existing access road has been chosen as the best option access for the site as it will minimise the area of new carriageway required and minimise the extent of works to the Common Land.

4.12 The proposed composition for the access - permeable no-dig Cellweb sub-base – is specially designed for use above trees and will ensure their long-term health. The design enables rainwater and oxygen to continue to penetrate below ground, providing vital nutrients to tree roots, and ensures that the weight of vehicles is laterally dissipated across the cells and not transferred to the soil below. The sub-base complies with relevant guidelines.

4.13 A case study example, sourced from the supplier, is provided at **Appendix A**.

4.14 The design approach can be compared to the existing driveway which is composed of concrete stretching some 40 metres through a wooded area. The proposed access will cover a greater

area of ground than the existing driveway, to meet highway standards, but there will be an overall reduction in impermeable surface. This means that the condition of the soil below is likely to be improved as a result of the works.

Objective 2 – Vegetation Removal

- 4.15 To mitigate any tree loss it is proposed to further enhance the quality of the Common Land as Priority Habitat and a local wildlife site through the provision of new planting along the side boundary and along the edges of the new access. Within the site, new planting would reinforce the boundary line in a location which is currently occupied by stabling facilities, mown garden land and a large area of hardstanding used as a driveway which will make limited contribution to the health of the common area. Enhancements could include native tree and shrub species and the introduction of bat, bird and hedgerow boxes, log piles and other habitat creation measures which would be informed by the ecological appraisal currently being prepared.

Objective 3 – User Experience

- 4.16 The upgrading of the access will not hinder the ability of local users to walk the public right of way and to access the Common Land further north and south. The main change is that the route would be more formalised and result in an increase in the number of vehicles going into and out of the site.
- 4.17 Mitigation is proposed to provide a tangible enhancement to the Common Land by offering an extended circular walking route leading from the Common Land area. The route extends around the edge of the development and includes ponds, biodiversity enhancement areas and play areas.
- 4.18 There is also the potential to offer a pathway through the southern boundary of the site to connect to the adjacent Gratton Chase development, and thus provide an off-route pedestrian route from the northern to southern part of the village.
- 4.19 Other compensatory measures have been identified through a review of Commons Committee minutes, in which a number of requirements have been identified. These could be funded as part of the proposed development, in collaboration with the Parish Council, Friends of Dunsfold Common and the Waverley Ranger. Examples might include funding for a continued woodland and pond management, funding for the board walk project and a new bin on the corner of the track. Specific measures will be identified during the public consultation event now underway and will be considered for inclusion within the formal Common Land application.

Consideration of Alternatives

- 4.20 The site is currently accessed via the entrance to Coombebury Cottage and it is therefore the only suitable location for the proposed works. There are no other access routes from the main road and nor was it possible to consider any other options without requiring significant tree removal and destruction of habitat.

5 ASSESSMENT

5.1 This section provides a response to each of the assessment criteria identified in Section 39 of the 2006 Act and the DEFRA Consents Policy (2015). These are as follows:

- The interests of persons having rights in relation to, or occupying, the land (and in particular persons exercising rights of common over it);
- The interests of the neighbourhood;
- The public interest, namely:
 - Nature conservation;
 - Conservation of the landscape;
 - Protection of public rights of access to any area of land; and
 - Protection of archaeological remains and features of historic interest.
- Any other matters considered to be relevant.

The interests of those occupying or having rights over the land

5.2 There are no rights of common registered for this particular part of the Common Land, other than the right to pass over the land with or without vehicles to access Coombebury Cottage, claimed in 1989. As Coombebury Cottage forms part of the application this right of access would become obsolete. As such there would be no interference with commoners occupying or having rights over this particular parcel of land as a result of this application.

The interests of the neighbourhood

5.3 The DEFRA Consents Policy confirms that the issues to be considered include whether the construction of the works means that local people will be prevented from using the common in the way they are used to and whether they would interfere with the future use and enjoyment of the land as a whole. It is also necessary to consider whether there are any positive benefits, such a replacement land, that would add to the neighbourhood.

5.4 Impacts in this context have been identified as construction phase impacts and operational phase impacts.

Temporary Impact: Construction Phase

- 5.5 It is acknowledged that there will be a temporary impact on the right of way during construction works, which will require a temporary diversion and a general impact on amenity on this part of the Common Land as a result of construction vehicles and construction works.
- 5.6 It is proposed to mitigate this impact by seeking a temporary diversion of the right of way. For users approaching from the south the path is likely to be diverted along the existing informal footpath that emerges on Dunsfold Common Road. The new section of pavement will be in place for people to continue their journey northwards towards the existing access. People approaching from the north will be diverted to Dunsfold Common Road.
- 5.7 It is also acknowledged that there will be an increase in larger vehicle movements, ie construction and delivery vehicles, along the access whilst the housing is built. This impact would unfortunately be unavoidable but it would be temporary – as with any new development - and would be managed through a Construction Management Plan prepared in compliance with the Considerate Contractors scheme.

Permanent Impact: Operational Phase

- 5.8 In the longer term, it is acknowledged that that there will be some impact on the character of the site through the upgrading of the access, which means that the route will no longer be domestic in nature and an increase in traffic movements will result.
- 5.9 However, it is considered that this impact can be mitigated, and the experience of the Common Land generally improved upon, through the provision of a new circular walking route leading from the Common Land.
- 5.10 The proposals include a pond close to the access which will provide an attractive 'turning' point, or destination to rest before making the return journey.
- 5.11 The circular route around the edge of the development will also provide an alternative walking route throughout the year, in particular during the wetter months when the Common Land can be more difficult to navigate.
- 5.12 The walking route would be approximately 650m long.
- 5.13 It is also proposed to provide a small bridge across the stream running through the Common Land. Currently users have to jump over this to continue northwards and as a result an informal path has been created over the years to avoid the stream. The informal path terminates on a verge by Dunsfold Common Road where it is necessary to cross over the road to continue along the footway. The bridge will enable users to continue northwards through the Common Land.

- 5.14 For those people still wishing to use the informal path, the proposed new section of footway between the site access and the existing footway on the east side of Dunsfold Common Road will provide the means to cross the road more safely.
- 5.15 For those people continuing northwards through the Common Land, recent amendments to the Highway Code means that when people are waiting to cross a junction, any vehicle looking to turn into the junction must give that person right of way. This means that it will be necessary for any vehicle turning into the development site to stop and wait for pedestrians to cross.

Public Interest

Nature Conservation

- 5.16 The site is identified as a local wildlife site and a Priority Habitat for deciduous woodland, wood pasture and parkland. To mitigate the impact of tree removal required, it is proposed to enhance the outside boundary of the designation with buffer planting and new planting within the designated area. As discussed previously in this report, the new planting would improve what is currently a sudden end to the designated area when the land becomes residential and equestrian in nature, with associated hardstanding and buildings.
- 5.17 Enhancements could include native tree and shrub species and the introduction of bat, bird and hedgerow boxes, log piles and other habitat creation measures which would be informed by the ecological appraisal currently being prepared.

Conservation of the Landscape

- 5.18 The proposal will have limited landscape impact due to the contained nature of the works within the wooded area. The main change will be the upgrading and formalisation of the access compared to what is currently domestic in character and this impact will be mitigated through the measures listed above.
- 5.19 The AONB boundary lies approximately 800m to the north of the site and due to this distance and scale of works proposed to the Common Land the proposal will have no impact on its setting.

Protection of public rights of access to any area of land

- 5.20 As set out above, there will be a temporary impact on the right of way over the existing driveway during construction which will require the route to be diverted temporarily through the informal footpath running through the adjacent woodland. The right of way will be re-established upon completion of the works.

Protection of archaeological remains and features of historic interest.

- 5.21 There is one nearby listed asset located near to the site - 1 and 2 Burdocks (Grade II listed) – and one Building of Local Merit opposite the entrance – Dunsfold Grange.
- 5.22 The National Planning Practice Guidance refers to the definition of setting as “the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”
- 5.23 Due to presence of trees and vegetation on the northern side of the access the listed property cannot be seen from the site. This vegetation will be retained as part of the proposal and therefore there will be no impact on the immediate setting of the property which is experienced from the front of the property and within its boundary.
- 5.24 The wider setting of both 1 and 2 Burdocks and Dunsfold Grange has overtime become residential in nature through the development of Griggs Meadow. The creation of an upgraded residential access within this context would not be out of keeping with the established character.
- 5.25 Furthermore, the existing views onto the Common Land from Dunsfold Grange are likely to include Coombebury Cottage, which would change as a result of the proposed development due to its replacement with a pond and open space. These changes would help to improve the sense of rurality.
- 5.26 The Surrey Historic Environment Record will be consulted with prior to the submission of the application to ensure that any archaeological records are identified and addressed as part of the application. A Built Heritage Report and Archaeological Assessment are being prepared.

6 SUMMARY

- 6.1 This pre-application submission is made to Dunsfold Parish Council, Waverley Borough Council, Surrey County Council and The Open Spaces Society in advance of an application to be submitted under Section 38 of the Commons Act 2006, as amended, for works to land at Dunsfold Common, Dunsfold, Surrey.
- 6.2 The works will involve the upgrading of an existing residential driveway into an access road into the proposed residential development on land at Coombebury Cottage. It will extend to 5.5m with a 2m pedestrian pavement immediately to the south. The existing concrete surfacing will be removed and a no-dig Cellweb sub-base with permeable surfacing and kerbing will be installed. This type of construction is suitable for use within wooded areas and will ensure the long term health of nearby trees.
- 6.3 This report provides a response to the key considerations assessed in an application for Common Land Consent, namely:
- The interests of persons having rights in relation to, or occupying, the land (and in particular persons exercising rights of common over it);
 - The interests of the neighbourhood;
 - The public interest, namely:
 - Nature conservation;
 - Conservation of the landscape;
 - Protection of public rights of access to any area of land; and
 - Protection of archaeological remains and features of historic interest.
- 6.4 It proposed to mitigate any identified impacts through the provision of a new circular route leading from the Common Land; new buffer planting along the boundary of the Common Land and other habitat enhancements in the designated area; the extension of the pavement along Dunsfold Common Road up to the bus stop to the north of the site access; and funding for other works required within the Common Land to be identified by Dunsfold Parish Council.
- 6.5 We would be grateful for your comments and recommendations on the proposal, ahead of the submission. We would also be grateful if this approach would be kept confidential at this stage


due to the sensitive information enclosed. Formal consultation with the other relevant parties will be undertaken in due course.

Appendix A – Cellweb Case Study

Case Study

Cellweb® TRP

Keats Way, Northamptonshire




Location:

New Development off Keats Way
Rushden
Northamptonshire
NN10 6EE

Project Description:

Overcoming Significant changes in levels within the RPA



Technical Requirements:

- 2.4m change in levels
- Curve Design
- Vegetated embankment face

Merchant:

Construction Lines

Consultant:

JPP Consulting Civil and Structural Engineers

Contractor:

South Midlands Homes


Overcoming significant changes in levels within the Root Protection Area

New Development off Keats Way, Rushden, Northampton

Introduction

Following the recommendations in Arboricultural Practice Note 12 and BS 5837 2005 and 2012, three dimensional cellular confinement systems have been widely used as a no dig solution in the construction of new hard surfaces within root protection areas (RPA's). The use of an open structured granular infill material offers vertical and lateral water permeation and enables continued gaseous diffusion between the rooting environment and the atmosphere. More often than not, the system is installed on relatively level sites, and there is a perception that the system is unsuitable for anything other than level terrain. In this case study we will look at how Cellweb®TRP has been used to overcome significant changes in levels within the RPA, while maintaining a healthy environment for tree roots.

Geosynthetics Limited were approached by JPP Consulting Civil and Structural Engineers regarding a new residential development on land off Keats Way, Rushden Northamptonshire. The area of land to be developed could only be accessed from Keats Way and a new access road would need to be constructed. The only feasible route for the new road would pass through the RPA of a large Beech tree. The Beech was considered to be of high amenity value and was to be retained within the new development, which meant that a 'no dig' tree root protection system would need to be used for the construction of the access road. Figure 1 shows the proposed route of the new access road passing through the RPA of the Beech, as out lined by the red circle. The blue hatched panels across the width of the access road denote panels of Cellweb®TRP.



Cellweb® TRP

Keats Way, Northamptonshire



Photo 1, shows the first layer of Cellweb®TRP being installed, with the retained Beech tree on the left. Minimal excavation was carried out on the far southern extremity of the RPA, at the entrance from Keats Way. This was carried out to create a flat surface to which 2.4m of Cellweb®TRP would need to abut. The Cellweb®TRP system is pegged out over the top of one layer of Treetex™ Geotextile. This acts as a separation layer, preventing the infill aggregate from migrating into the subgrade below. This also acts as a pollution control measure in accordance with BS 5837 2012.



Photo 2, shows the progression of the installation and the layering of the Cellweb®TRP. To the right in the photo and next to the tree we can see the beginnings of the formation of a Cellweb®TRP embankment. This batter is designed to have a gradient of one in three and is infilled with the same 4-20mm clean angular stone used to infill the rest of the system. The end cells of each layer of Cellweb®TRP are left empty and are later filled with topsoil and are planted to create a vegetated embankment.

Case Study

Cellweb® TRP

Keats Way,



Photos three and four below, show the completed access road and development eighteen months later. In photo three it can be seen that the Cellweb®TRP section of the new access road is surfaced using permeable blocks, allowing continued water permeation and gaseous exchange.

The remaining road outside of the RPA is constructed using a conventional subbase with an asphalt surface.

In photo four we can see the completed batter which passes around the main stem of the retained Beech, allowing enough space for the future incremental growth of the buttress roots. The end cells of each layer of Cellweb®TRP have been infilled with topsoil and are now planted to create an attractive vegetated bank.



Photo 3: Finished development



Photo 4: Close up of the finished development

Conclusion

It can be seen from this case study that with thoughtful design Cellweb®TRP can be utilised on far more challenging sites than previously thought. This is particularly poignant at a time where we see increasing demand for development land, which places ever increasing pressure on our national tree stock. The benefits of trees are becoming increasingly recognised and it is important that we utilise engineered solutions to enable us to retain healthy trees as part of future developments.

The Beech tree in this case study now forms part of an ongoing programme to assess the health and vitality of trees which are subject to the construction of Cellweb®TRP systems. More information on this programme is available by contacting Geosynthetics Tree Root Protection team on 01455 617139.

November 2022

Expenditure		
Mr & Mrs WG Goodall	Office rent	180.00
RJ Walker	KGV bollards and strimming	855.00
BT	Telephone and broadband	166.03
Sage Global Services	Payroll	8.40
HMRC	October tax and NI	29.39
Celeste Lawrence	October PAYE	911.35
Surrey Pension Fund	October payment	238.32
		2388.49
Income		