
Waverley Borough Council Local Plan Part 1: Strategic Policies and Sites

Id-3 Matters and Issues for Examination

Response on Behalf of
Protect Our Waverley Campaign (Powcampaign Ltd)

and

Joint Parish Councils of Alfold, Bramley, Busbridge, Chiddingfold, Dunsfold,
Hambleton, Hascombe, Loxwood, Plaistow and Ifold, Shalford and Wonersh.

May 2017

**WAVERLEY BOROUGH COUNCIL LOCAL PLAN PART 1: STRATEGIC
POLICIES AND SITES**

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PROTECT OUR WAVERLEY CAMPAIGN (POWCAMPAIGN LTD)**

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CHIDDINGFOLD, DUNSFOLD, HAMBLEDON, HASCOMBE, LOXWOOD,
PLAISTOW AND IFOLD, SHALFORD AND WONERSH.**

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MATTER 1: CALCULATION OF THE OBJECTIVELY ASSESSED NEED FOR HOUSING (OAN)

Question 1.1

The OAN in the Plan appears to be based on older household projection figures. I have read the alternative OAN calculations submitted by Neil McDonald, NLP and others. It is necessary to understand whether later figures should influence the OAN. What should be the starting point for the calculation of the OAN?

- 1.1.1 We note the submissions made to the Council which indicate that the 2014-based projections represent a more appropriate starting point. Clearly the Inspector will need to reach a view on the starting point for the OAN taking into account the available evidence and Planning Practice Guidance. It is only once the starting point is correctly established that due consideration can be given to whether the housing needs can be met in full through sustainable development, taking into account the borough's characteristics and constraints (including the potential to review the extent of the Green Belt).
- 1.1.2 If the Inspector finds that the housing requirement should be reduced, this obviously has implications for the proposed spatial strategy including the justification for Dunsfold Aerodrome to be allocated for development.

Note: we do not provide responses to questions 1.2, 1.3, 1.4, 1.5, 2.1 or 2.2

MATTER 3: HOUSING TRAJECTORY

Question 3.1

Is the housing delivery trajectory at Appendix C of the Plan a reasonable estimate of delivery over the plan period 2013-32, having regard to the likely contribution of the strategic sites, especially Dunsfold Aerodrome?

- 3.1.1 The trajectory demonstrates the reliance of the Local Plan on the delivery of housing at Dunsfold Aerodrome, particularly in the later plan period. There are substantial risks to the borough's land supply associated with relying so heavily on a large single and complex site for meeting such a significant proportion of the borough's future housing requirements. This is particularly the case in the period post 2026, by which time all other 'strategic' allocations are expected to be completed, although even from 2022 the site is anticipated by the Council to deliver 47% of the overall supply. In our opinion, this is unrealistic even assuming outline consent being granted in 2017/18 and reserved matters approval in 2018/19.
- 3.1.2 Dunsfold Aerodrome is a complex site with significant infrastructure anticipated to be required at an early stage in the development process including utilities/drainage and highway improvements. These will inevitably cause delays to the commencement of development and build out rates, along with associated cashflow implications. Furthermore, whilst there is a resolution from the Council to permit a hybrid application for Dunsfold Aerodrome for 1800 dwellings (subject to negotiating and agreeing a Section 106 agreement), this has been called-in by the Secretary of State for determination. This process will have implications for the commencement of development from that previously anticipated.
- 3.1.3 We note from the Dunsfold Aerodrome Delivery Assessment of November 2016 that the expected 8 years of supply of 257 dwellings per annum from Dunsfold Aerodrome between 2022 and 2030 is close to an 'appropriate upper ceiling' and that 'such high levels of output are almost always regarded as challenging for the development industry to achieve' (see paragraph 5.4). To rely on such high delivery rates on a single site for 8 consecutive years appears to be overly ambitious with consequential impacts on the realistic housing land supply position for the Borough during this period.
- 3.1.4 In response to this challenge, the Council could allocate additional land for development elsewhere in the borough to provide greater confidence in delivering a 5-year housing land supply. Alternatively, the Council should reconsider the spatial strategy of the Plan to explore alternative ways of delivering housing to meet the identified needs i.e. omit Dunsfold Aerodrome from the spatial strategy.

Question 3.2

What are the key infrastructure improvements required to deliver the required amount of housing and other development? Are there any significant infrastructure delivery issues (transport, water, sewerage etc.) that might affect delivery of the Plan's proposals or progress with the housing trajectory?

- 3.2.1 The Council's Infrastructure Delivery Plan (IDP) indicates the following key infrastructure matters which they consider to be specifically needed to be addressed to deliver the proposed strategic allocation at Dunsfold Aerodrome:
- i. Bus services to be provided and secured in perpetuity from the outset to influence travel patterns
 - ii. Gas and electricity supply needs to be reinforced
 - iii. Major water supply resource transfer scheme from Guildford which would take several years to plan and implement (potentially in excess of 4 years). Such a project does not currently appear in the Thames Water Water Resource Management Plan. The IDP goes on to note that Thames Water is working directly with the site promoter's in order to understand the impact of providing new infrastructure which is currently unfunded by the price review process
 - iv. Sewage treatment – the IDP notes that the most significant impact on the treatment and network capacity will arise from Dunsfold Aerodrome. It goes on to note that the developers are proposing to deal with the development's foul water flows by using on-site water treatment. This is a complex issue that will be time-consuming and costly to address. We question the ability to deliver/occupy houses if no solution is provided in the early years of the plan period
 - v. Possible need for a new household recycling centre on-site
 - vi. New two form entry primary school and funding for two form expansion of Glebelands Secondary School
 - vii. A new primary care facility that may need to be expanded.
- 3.2.2 The Environment Agency objected to the planning application at Dunsfold Aerodrome in accordance with Paragraph 109 of the NPPF, and related PPG, on the grounds that it may have a significant adverse impact on water quality. The applicant has so far been unable to demonstrate that the proposed on-site sewage treatment works is feasible in providing a sewage discharge that is acceptable under the Water Frameworks Directive. After the Council resolved to grant planning permission (now called-in by the SoS), the Environment Agency has written to the applicant stating that their Operation Instruction provides guidance on lack of capacity in the public sewers and explains that lack of capacity is not a reason to grant a permit for a new discharge. Long term and detailed engagements will be required between the applicant and the sewerage undertaker to establish many factors including, but not limited to, the cost of connection and the phasing of development. We note that the under-capacity in the area has already delayed developments permitted in Alfold and Cranleigh.
- 3.2.3 The Infrastructure Delivery Schedule contained within the IDP lists further details of the infrastructure anticipated to be required. The extent, costs (both identified and unidentified) and funding gaps for infrastructure identified for Dunsfold Aerodrome are considerable. This is likely to impact on cashflow and early viability of the proposals. These matters reinforce the concerns about the ability of Dunsfold Aerodrome to deliver according to the trajectory set out by the Council and emphasise the need to reconsider the spatial strategy.

MATTER 4: FIVE YEAR HOUSING LAND SUPPLY

Question 4.1

Is the Council's 5-year housing land supply calculation reliable? What are the potential uncertainties around commitments, windfalls and rates of delivery on allocated sites? Will the plan's strategic allocations and policies, together with allocations from neighbourhood plans and any future site allocations plan, ensure that sufficient sites are available for a 5-year supply of deliverable land to be maintained into the future?

- 4.1.1 As discussed in our response to question 3.1 above, we have significant concerns about the reliance on Dunsfold Aerodrome as the sole strategic allocation in the later years of the Plan. Such a strategy would be unlikely to ensure that there are sufficient sites in the future to deliver, and maintain, a 5-year supply of deliverable land. An alternative spatial strategy, with a more diverse mix of site sizes in different locations & contributing towards the borough's land supply should be considered in this regard which is not reliant on a complex new settlement in an unsustainable location such as Dunsfold Aerodrome.

Question 4.2

Should the Plan's policies contain any flexibility measures to ensure a continued 5-year supply? (For example, expressing the housing requirement as a minimum and allocating additional sites for contingency purposes, or allowing for small-scale development outside but abutting settlement boundaries where major policy constraints are absent.)

- 4.2.2 We have highlighted above our concerns about the limited mix of sites relied upon in the Plan. We contend that there is a need for a new spatial strategy which delivers a variety of sites to provide a five-year land supply across the plan period.

MATTER 5: SPATIAL STRATEGY

Question 5.1

Paragraph 3.2 of the Plan states that most of the new development will be located in and around the main settlements of Farnham, Godalming, Haslemere and Cranleigh which have the best available access to jobs, services, housing, community facilities and so on. How can the Dunsfold Aerodrome allocation be justified against this spatial strategy?

- 5.1.1 Notwithstanding the concerns of the Secretary of State in their 2009 decision, it is our view that the Council has been unreasonably pre-disposed to the development of Dunsfold Aerodrome from the outset. They have placed undue weight on the site's potential status as 'previously developed land' and its availability. At the same time the Council has downplayed its inherently unsustainable location in the open countryside some distance from existing settlements, facilities, and services with inevitable concerns about overall deliverability and infrastructure requirements. This is reflected in the absence of any meaningful appraisal of reasonable alternative spatial strategies in the Sustainability Appraisal. Given the Council's position in 2009 of resistance to the principle of development on Dunsfold Aerodrome, and the concurring view of both the Planning Inspector and the Secretary of State, the failure to consider reasonable alternatives is particularly damning.
- 5.1.2 In specific response to the question posed, it is our view that the spatial vision for the borough as articulated in paragraph 3.2 of the Local Plan will clearly not be delivered by the proposed spatial strategy. The reasons for which are outlined below.
- 5.1.2 Paragraph 5.25 of the Local Plan would appear to try and justify the spatial strategy on the basis of a combination of the borough's constraints (including Green Belt & AONB) and the availability of Dunsfold Aerodrome. Further attention is drawn to the accompanying Sustainability Appraisal where it is claimed that "a range of alternative spatial strategies were tested". Given that all but one of the seven alternative strategies tested included significant development at Dunsfold Aerodrome, we disagree with this contention.
- 5.1.3 If development were to be distributed in relation to where the housing need predominantly arises (or indeed is focussed on settlements with good accessibility), the spatial strategy would be substantially different. The failure to have considered spatial strategies with increased development focused at, or near, to main settlements and/or areas of high accessibility is not justified. The Council has failed to adequately identify and consider reasonable alternatives, including new communities elsewhere within the borough, which are not reliant on the unsustainable location of Dunsfold Aerodrome.
- 5.1.4 Furthermore, we note that the accompanying Sustainability Appraisal concludes that development at Dunsfold Aerodrome is only the most sustainable option if a low priority is given to economy, transport and housing criteria. It is therefore assumed that in pursuing this option, the Council is not prioritising either economic, transport or housing sustainability objectives.

- 5.1.5 In our view, the appraisal of sites within the Land Availability Assessment (LAA) is flawed, including the unjustified discounting of some sites from further consideration, the lack of explanation as to why Dunsfold Aerodrome is identified as being suitable of further appraisal compared to other discounted sites and the absence of any pro-active identification of sites by the Council themselves. The Council's response on pages 2 to 4 to the Inspector's initial questions and comments (WBC-LP1-2 Responses to Inspector's Initial Questions) further emphasises the concerns we have with the process.
- 5.1.6 In particular, the LAA and the SA assume that a site's brownfield characteristics automatically make it a more sustainable option than greenfield land. This assumption serves to give Dunsfold Aerodrome an infallible advantage in these assessments against other new settlement promotions, as well as greenfield sites adjacent to existing settlements. For example, the LAA rejects over 200 sites using a range of reasons that could equally be levelled against Dunsfold Aerodrome, including:
- i. Further than 100m from settlement
 - ii. Impact on landscape
 - iii. Not well related to the settlement boundary
 - iv. Adverse impact on nature conservation interests
 - v. Impact on the Surrey Hills Area of Outstanding Natural Beauty
 - vi. Isolated location
 - vii. Detrimental visual impact
- 5.1.7 These sites that the LAA rejects do not appear to form part of the reasonable alternatives that are then assessed in the SA. Consequently, there are several sites that promoters have submitted to the Council that are available for development, yet have been arbitrarily rejected from the LAA. The reasons given in Appendix 1b of the LAA are not detailed, and simply as referenced above. There is, for example, no opportunity to understand what landscape impact warranted the discounting of one site and if this was supported by any evidence. Notwithstanding the 'brownfield' argument of Dunsfold Aerodrome, it is impossible to understand why Dunsfold Aerodrome was considered suitable for further assessment while others were not.

Question 5.2

To what extent does the apportionment of housing in Policy ALH1 reflect the needs of the settlements themselves?

- 5.2.1 The housing distribution strategy proposes 26% of growth at a new settlement (as shown in table 5.2 below). The Council has not considered the need of a new settlement and the role this would play in meeting the wider housing needs of the borough. We are not convinced by the evidence before us that a new settlement at Dunsfold Aerodrome could best meet the needs of existing towns and villages in Waverley over and above other locations.
- 5.2.2 In principle, a new settlement will require a significant number of those in housing needs in these existing communities to relocate. This will remove these households from their support network, and may necessitate growing families to move a child out of their current school to meet their housing needs. This impact becomes more severe, in principle, when considering those in affordable housing need. These households are more likely to be unable to afford to run a car or pay for daily public transport, and more likely to be dependent on their existing

support networks. A new settlement could essentially sever those in affordable need from an essential support network.

- 5.2.3 As set out in our response to matter 3.2, there are outstanding questions regarding the uncertainty of delivery of community infrastructure at the proposed development at Dunsfold Aerodrome. This compounds the potential social and environmental effects of the proposals, as residents at Dunsfold Aerodrome are required to travel to nearby towns and villages to access their support networks and community facilities.
- 5.2.4 We recognise the role that new settlements can have in providing for housing needs. However, the impacts of doing so at the expense of growth at existing communities have not been fully explored. Paragraph 52 of the NPPF states new settlements, following garden city principles, can sometimes be the best solution for delivering new homes. It goes on to state that Councils should work with the support of their communities to consider whether this would be the best way of achieving sustainable development.
- 5.2.5 Before determining the future location of such households most in need (in particular more vulnerable households), the Council must provide robust evidence to demonstrate that the financial and social burdens placed upon such households is acceptable in housing policy terms. For example, housing rents reduced to cover additional costs of travel (car/bus) to support networks, employment etc.
- 5.2.6 In summary, we consider that the decision to pursue the principle of a new settlement has yet to be justified, including the limited evidence available to consider the social effects on existing communities in the borough.

Table 5.2: Proposed housing distribution across the borough in relation to past completions, current population size and identified affordable housing need					
Settlement	Population	Identified affordable housing need (per annum)	Proposed spatial distribution		Housing completions 01-13 ¹
			In LP	Of which already committed (i.e. LP has v. little influence) ²	
Godalming	22,000 (18%)	62 (20%)	1,240 (13%)	1,047 (84%)	505 (18%)
Farnham	39,000 (32%)	111 (35%)	2,330 (24%)	1,234 (53%)	930 (33%)
Haslemere	17,000 (14%)	25 (8%)	830 (8%)	552 (67%)	584 (21%)
Cranleigh	11,000 (9%)	33 (11%)	1,520 (15%)	901 (59.3%)	249 (9%)
Rest of Borough	32,000 (26%)	83 (26%)	Dunsfold 2,600 (26%)	0 (0%)	532 (19%)
			Other	572 (42.7%)	

			1,341 (14%)		
Waverley	121,000	314	9,861	4,306 (44%)	2800

Question 5.3

Does the apportionment of development in the Plan have proper regard to the quality and capacity of the road network, and the quality and capacity of public transport? What are the principal transport improvements and projects that are required for the implementation of the Plan?

- 5.3.1 Paragraph 34 of the NPPF is clear that development that generates significant movements should be located where the need to travel will be minimised and use of sustainable transport modes can be maximised, albeit that other policies of NPPF also need to be taken into account.
- 5.3.2 There are comparatively very good road and public transport connections in the north and west of the borough, with significantly poorer accessibility in the south and east of the borough (where Dunsfold Aerodrome is located). The spatial strategy proposes significant quantum of development in the areas which are most poorly served by road and public transport with inadequate mitigation. Reasonable alternative spatial strategies, which consider the scope to focus development in areas of high accessibility, have not been duly appraised and considered by the Council.
- 5.3.3 With specific regard to Dunsfold Aerodrome, evidence prepared by Mott MacDonald on behalf of the Council and forming part of the evidence base for the LP makes it clear that the site performs extremely poorly in transport terms (see Table 7.1 here: http://www.waverley.gov.uk/download/downloads/id/5180/mott_macdonald_transport_assessment_stage_4_june_2016.pdf).
- 5.3.4 The key mitigation will clearly be the new access to the site direct from the A281. Much is also made of the supposed mitigation to ease the traffic flow through Bramley, but we have doubts concerning the efficacy of this.

Question 5.4

As Farnham is the largest town, with a good range of shops and services, excellent access to the national road network and good rail and other public transport links, why hasn't more housing land been allocated there in the interests of a sound sustainable development strategy?

- 5.4.1 We share the Inspector's concerns that the potential for Farnham (or other settlements / locations) to deliver significant housing provision within the plan period has not been duly considered. We recognise that the provision of Suitable Alternative Natural Green Space (SANG) to mitigate the impact on Thames Basin Heath SPA may be required and that part of Farnham is affected by Green Belt & AONB. However, this does not negate the negligible efforts that the Council have taken to adequately test the potential of this area and consider the benefits arising compared to the harm.

Question 5.5

Will the Plan provision for Farnham fall significantly short of identified need, for both market housing and affordable housing?

- 5.5.1 The Strategic Housing Market Assessment (SHMA) indicates that the net affordable housing need arising from Farnham is 111 households per annum, representing 35% of net affordable housing need (314 dwellings). There does not appear to be any specific numbers of new homes identified for open market housing in Farnham itself.
- 5.5.2 We note that Farnham is the major town within the borough, accommodating some 39,000 residents. According to our analysis of completions (see table 5.2 above), Farnham accommodated 33% of overall housing supply in period 2001-2013.
- 5.5.3 The proposed delivery of only 2,330 dwellings (24% of overall supply) in the plan period is likely to fall significantly below that needed in Farnham. For instance, the projected affordable housing needs alone in Farnham are 2,109 dwellings over the plan period (19 years x 111 affordable homes per annum). The implications of failing to meet this need in (or near to) Farnham have not been considered by the Council.

Question 5.6

Having regard to the spatial strategy, why hasn't more housing been allocated to Godalming and Haslemere?

- 5.6.1 As set out in table 5.2 above, both Godalming and Haslemere accommodated a greater percentage of overall housing numbers during the period 2001-2013 than that now proposed in this Plan. Whilst we acknowledge that both settlements are restricted by Green Belt and AONB, we are not convinced that the Council has demonstrated that potential sites within and adjoining these settlements have been fully considered given the facilities and services available in these locations and their comparatively good public transport and road links. In our view, there is a need to properly assess the needs of all settlements / communities and plan accordingly.

Question 5.7

Is Cranleigh, which is a considerably smaller town, a suitable location for the volume of growth proposed?

- 5.7.1 As set out in responses above, there is a need for a comprehensive assessment based on needs and potential development sites. When this evidence is available, all reasonable alternatives for growth locations can be assessed through the SA.

Question 5.8

Does the Plan strike the right balance in its apportionment of development to the other settlements?

- 5.8.1 As set out in responses above, there is a need for a comprehensive assessment based on needs and available sites. When this evidence is available, all reasonable alternatives for growth locations can be assessed through the SA.

Question 5.9

If the Plan had to accommodate a greater housing requirement, for example through a higher OAN or the accommodation of unmet need, what would be the implications in terms of the spatial strategy?

- 5.9.1 For reasons as set out in our responses above, we contend that a revisit of the proposed spatial strategy is already required including the consideration given to existing designations. The Plan, as prepared, doesn't meet the vision set out for its spatial strategy. There is a need to revisit the proposed allocations therein.
- 5.9.2 A greater housing requirement would obviously also require a comprehensive revisit of the strategy, but would not necessarily require Dunsfold Aerodrome to be delivered to meet this requirement given the potential alternative locations that are likely to arise from a robust review.

Note: we do not provide responses to questions 6.1 or 6.2

MATTER 7: GREEN BELT

Question 7.1

Some sites identified for release by the Green Belt Review have not been released in the Plan. What are the reasons for this?

- 7.1.1 We have a wider concern about the appropriateness of the Green Belt review in taking into account the NPPF in balancing due consideration of the release of land in the Green Belt to deliver a sustainable pattern of development that seeks to minimise the need to travel and maximise the use of sustainable transport modes.

Question 7.2

Some areas of land are marked for potential release from the Green Belt but boundaries are not shown. Whilst acknowledging that in some cases detailed boundaries might be left for subsequent plans, has the Plan deferred too many such sites to Part 2? Does this approach provide enough certainty for local people and landowners? Does it act as an unnecessary impediment to timely housing delivery and can these sites be relied upon to contribute towards future housing delivery?

- 7.2.1 In our view, insufficient consideration has been given to the potential release of wider tracts of land within the Green Belt in order to enable sustainable patterns of development within the borough. Furthermore, the deferment of consideration of the potential release of sites already identified by the Council to Part 2 of the Local Plan reinforces our concerns that the Council are reliant on a spatial strategy that is predisposed toward Dunsfold Aerodrome that will not maintain an adequate supply of housing across the plan period that meets local needs.

Question 7.3

Is the Plan sound in its choice of sites to be removed from the Green Belt?

- **Land south east of Binscombe, Godalming**
- **Land between Aaron's Hill and Halfway Lane, Godalming**
- **Chiddingfold**
- **Elstead**
- **Milford and Witley**

- 7.3.1 We remain unconvinced that the review of the Green Belt is sufficient in identifying potential sites for release with regard to the provisions of the NPPF, including paragraph 84.

MATTER 8: THE NATURAL ENVIRONMENT

Question 8.1

Is the approach towards the different SPAs sound, having regard to mitigation proposals? What are the implications of the spatial strategy for nationally / internationally important habitats? Has the Council considered the implications of the Wealden High Court judgment of 20 March 2017?

- 8.1.1 The HRA includes a consideration of 'in-combination' effects, focussed purely on those designated sites within the borough. This assessment notes that where these designated sites overlap with other authorities, for example the Thames Basin Heaths SPA, there is uncertainty regarding the number of homes being planned for. With regard to the Thames Basin Heaths, the HRA inappropriately uses the South East Plan housing targets for these areas to establish a minimum threshold for development in these authorities (Paragraph 5.7.15). We consider that this should be updated to reflect the most recent OAN for these authorities, as this should be the starting point for each Council in establishing a housing target for their plans.
- 8.1.2 Furthermore, the HRA does not include an "in combination" assessment of some designated sites that lie outside of the borough, but are screened into the assessment "*primarily because they lie within the distance over which visitors from Waverley Borough are likely to make recreational day visits*" and "*some sites may also be vulnerable to effects of development within Waverley that may act on a wider spatial scale (e.g. regional traffic movements, demands on water catchments).*" (Paragraph 1.3.4)
- 8.1.3 We are concerned that the proposed strategy for the plan, particularly its reliance on the isolated site at Dunsfold Aerodrome will cause such traffic movements that impact on these designated sites beyond the borough. There appears to be no assessment of these potential impacts through the HRA.

Question 8.2

What is the timetable for the review of the AONB boundary? Is the retention of the AGLV unnecessary duplication, and what are the implications of retaining this designation for the delivery of sustainable development?

- 8.2.1 No response.

Question 8.3

What would the effect of the spatial strategy be on the AONB, both visually and in terms of movement? (See also 9.8)

- 8.3.1. As we have referenced in our response to questions 5.2 and 9.1 to 9.5, the proposed development at Dunsfold Aerodrome will likely create significant additional traffic movement on the local road network. The Surrey Hills AONB Board in response to the submission plan, consider this "*would spoil the relative tranquillity and the character of several ill-suited country lanes within the Surrey Hills AONB. The nature of such a large development would also adversely impact upon the setting of the AONB.*" (Page 2, AONB Board response to Reg 19 consultation). The AONB board goes on to state that of all the proposals in the plan, "*this proposed development would cause the greatest harm to the adjoining AONB*".

- 8.3.2 Chapter 11 of the NPPF states how the planning system should contribute to and enhance the natural environment. It should protect and enhance valued landscapes (Paragraph 109), and local plans should allocate land with the least environmental amenity value (Paragraph 110). Although the aerodrome itself may have limited amenity value, as stated by the AONB Board, its relatively open nature contributes to the setting on the AONB. The site is also visible from a number of important viewpoints within the AONB, including Hascombe Hill. Consequently, the site does have an amenity value in relation to the AONB, which receives the 'highest status of protection in relation to landscape and scenic beauty' (Paragraph 115).
- 8.3.3. While the NPPF does include policies which encourage the effective use of brownfield land, it also states that this should not be of high environmental value. The Dunsfold Aerodrome proposals are likely to have an adverse impact on the setting of the AONB, and lead to increased traffic movements through this tranquil area. The site clearly has environmental value. The partial brownfield nature of this site needs to be balanced against the potential environmental impacts, specifically on the AONB since it receives the 'highest status of protection'.
- 8.3.4 As mentioned throughout our representations, the opportunity to achieve the benefits of a new settlement have not been appropriately considered against reasonable alternative locations (including new settlements in locations other than Dunsfold), as required by the Environmental Assessment of Plans and Programmes Regulations (2004). Consequently, the decision makers have not been informed of what, if any, alternatives exist for achieving the same potential benefits of Dunsfold Aerodrome, without causing as much harm to the landscape.

MATTER 9: DUNSFOLD AERODROME

Question 9.1

What is the realistic volume of car trips that can be expected from the site, given the probability of car-based movements for commuting and shopping trips and the potential for car movements for educational trips (there being no proposed secondary school)?

- 9.1.1 The 'Scenarios for Housing Growth Transport Assessment' prepared by Mott McDonald on behalf of Waverley Borough Council (WBC), as part of the evidence base for the Local Plan, states that with 1,800 houses, along with other proposed uses, at Dunsfold Aerodrome the scheme (plus 119 houses within nearby villages) would generate 941 external two-way vehicle trips in the morning peak hour and 1110 external two-way vehicle trips during the evening peak hour. In comparison, the Transport Assessment prepared by Vectos supporting the current planning application at Dunsfold Aerodrome states that the proposed 1,800 houses, along with other proposed uses, would result in 891 external two-way vehicle trips during the morning peak hour and 969 external two-way vehicle trips during the evening peak hour. The Mott McDonald report also considers the scenario of 2,600 houses at Dunsfold Aerodrome and states that this, plus 119 houses within nearby villages, would generate 1,261 external two-way vehicle trips during the morning peak hour and 1,501 external two-way vehicle trips during the evening peak hour.
- 9.1.2 The assessments rely entirely on assumptions in relation to the expected trip rates, mode share and trip internalisation in order to estimate the level of vehicle trips associated with the scenarios considered. We are of the view that the actual figure could be significantly higher than that presented in the current assessments.

Question 9.2

On which communities will the main environmental effects of additional traffic movement from Dunsfold Aerodrome fall, having regard to the above?

- 9.2.1 The Mott McDonald Scenarios for Housing Growth Transport Assessment details the expected routing of vehicle trips associated with the Dunsfold Aerodrome site. The analysis indicates that the communities at which the main environmental effects as a result of increases in traffic are the communities along the A281 corridor both north and south the site and the communities along the B2130 route and unclassified lanes to and from the A3 and the railways stations.
- 9.2.2 The assessment indicates that the 1,800 house scenario would result in 279 two-way vehicle trips during the morning peak hour and 329 two-way vehicle trips during the evening peak hour routing north along the A281 through the villages of Bramley and Shalford, towards Guildford. For the 2,600 house scenario, this would result in 368 two-way vehicle trips during the morning peak hour and 439 two-way vehicle trips during the evening peak hour routing through the villages of Bramley and Shalford.
- 9.2.3 For the communities along the A281 corridor south of the site, the assessment states that the 1,800 house scenario would result in 182 two-way vehicle trips during the morning peak hour and 250 two-way vehicle trips during the evening peak hour routing through the villages of Alfold, Bucks Green and Clemsfold towards Horsham. For the 2,600 house scenario, this would result in 241 two-way vehicle trips during the morning peak hour and 337 two-way vehicle trips during the evening peak hour routing through the villages of Alfold, Bucks Green and Clemsfold.

- 9.2.4. For the communities along the B2130/Marwick Lane corridor, the assessment indicates that the 1,800 house scenario would result in 167 two-way vehicle trips during the morning peak hour and 211 two-way vehicle trips during the evening peak hour routing through the villages of Hascombe, Hydestile, Enton and Milford towards the A3. For the 2,600 house scenario, this would result in 225 two-way vehicle trips during the morning peak hour and 287 two-way vehicle trips during the evening peak hour routing through the villages of Hascombe, Hydestile, Enton and Milford.
- 9.2.5 It is highlighted that for the majority of communities affected the increase in vehicle trips will route through the centre of villags, resulting in potentially significant impacts including vehicle queuing and delay, severance, road safety andharm to air quality.
- 9.2.6 In additional to the overall vehicle trips, the allocation would result in a significant increase in HGV traffic associated with Dunsfold Aerodrome. Not only would the housing generate HGV traffic, but so would the associated expansion of the business park, especially with B8 space. As with all traffic estimates, the assumptions determine the results and are therefore key. HGV traffic will typically occur outside peak periods in order to avoid congestion and vehicle delay. The Technical Note 'HGVs associated with the Dunsfold Development' prepared by Mott McDonald indicates that the site would generate an additional 182 daily HGV movements, of which only 12 would occur during the morning peak hour and 5 during the evening peak hour. In contrast, The Transport Assessment prepared by Vectos in relation to the current Dunsfold Aerodrome planning application indicates that the development would generate an additional 26 HGV trips during the morning peak hour and 16 HGV trips during the evening peak hour. The Vectos assessment does not provide detail of the likely HGV trips throughout the day. In addition, analysis undertaken by POW, using the Applicant's own data, indicates that the likely HGV trip generation of the site could be significantly greater than that presented in the current assessments.
- 9.2.7 The routing of HGVs that have been considered in the Mott McDonald Technical Note indicates that, in addition to utilising key corridors such as the A281, HGVs are likely to utilise local east-west routes including the B2130 and Markwick Lane towards the A3. The Mott McDonald Technical Note considers the suitability of these routes to accommodate increases in HGV traffic. It concludes that the geometry and conditions of routes via the B2130, Markwick Lane and High Street Green are not suitable for HGVs and this has contributed to the number of accidents that has occurred over recent years. To this extent, the likely increases in HGV traffic, in particular on local routes, will have potentially significant impacts on the communities along the routes including impacts on local amenity, severance and highway safety.

Question 9.3

What are the implications for the road network, including:

- **the A3**
- **the A281 and other routes into Guildford**
- **the character of roads in the countryside, AONB and AGLV**
- **roads in other districts?**

- 9.3.1. The allocation of the Dunsfold Aerodrome site has the potential to have a severe impact on the highway network, in particular the A281 towards Guildford. Based on the assessment provided, the site is expected to generate a significant number of vehicle trips. However, as previously advised, it is highlighted that this relies on significant assumptions in relation to the expected trip rates, mode

share and trip internalisation in order to estimate the level of vehicle trips associated with the development scenarios. We are of the view that the actual figure could be significantly higher than that presented in the current assessments.

- 9.3.2 In addition, the site would result in increases in vehicle traffic, in particular HGVs, on the east-west roads within the vicinity of the site. These are country lanes, often narrow, that pass through local villages. Increase in HGV and vehicular traffic will have potentially significant effects on the character of the routes with potential impacts on local amenity, severance and highway safety.

Question 9.4

In terms of transport, what is the timing of the “package of measures” in the Infrastructure Delivery Plan” (including any outside the Borough) and should this be in the Local Plan?

- 9.4.1 The Infrastructure Delivery Plan identifies that the allocation of the Dunsfold Aerodrome site would require a significant package of highway infrastructure and mitigation measures which will need to be delivered by 2032. The package of measures includes traffic capacity mitigation along the A281 corridor, an HGV management plan and a significant bus network to serve the site and key destinations including Guildford, Godalming and Cranleigh which will need to be secured in perpetuity.
- 9.4.2 In the event that the Inspector was minded to support the allocation of Dunsfold Aerodrome, in order to mitigate the impacts the Local Plan would need to secure appropriate highway infrastructure including that identified in the Infrastructure Delivery Plan. For key transport infrastructure, such as the bus network, the Infrastructure Delivery Plan does not provide detail of the expected cost or timing of delivering the necessary bus routes to serve the site in perpetuity. The lack of detail of the cost and timing implications of delivering the bus network required to serve the site in perpetuity, questions the long term viability of the site.

Question 9.5

What degree of:

- **environmental mitigation**
- **traffic mitigation**

could realistically be expected from these measures?

- 9.5.1 The site at Dunsfold Aerodrome should be expected to fully mitigate any environmental or traffic impacts associated with the allocation of the site. In addition, in accordance with the requirements of the NPPF, mitigation should be provided to ensure that the site is sustainable and provides people with a real choice in how they travel, such that the use of sustainable transport modes can be maximised.
- 9.5.2 The ‘Scenarios for Housing Growth Transport Assessment – Stage 4’ report prepared by Mott McDonald for WBC considers the transport sustainability matters associated with the proposed housing growth areas. The report considers the existing sustainable transport provision, including public transport provision, in the vicinity of the Dunsfold Aerodrome site and opportunities for improvements to sustainable travel and public transport at the site. The report concludes that *“Given the location, walking to other work locations is unlikely*

and there is low potential for a frequent bus service to major employment centres to be viable in the long term. Therefore, it is difficult to see how increases in sustainable travel could be encouraged at the Dunsfold site." In addition the report concludes that at Dunsfold Aerodrome it will be "*Difficult for new bus services to remain viable.*" We also note the concerns raised in the Surrey Council Council's Highway objection to the planning application for development at Dunsfold Aerodrome which stated that there is little that can reasonably be introduced in this location, which is cost effective, as well as environmentally sustainable. No evidence has been produced that the proposed bus services will deliver these two fundamental credentials, and the present undertaking to fund them for perpetuity, is likely to be the subject of a serious challenge if over time, as suspected, little use is made of them.

- 9.5.3 The Local Plan indicates the provision of new bus services to serve the Dunsfold Aerodrome site to seek to mitigate the lack of access to sustainable modes of travel at the site and these services will need to be secured in perpetuity. No detail is provided as to how appropriate bus services can be secured in perpetuity and, given that WBC's own study concludes that new bus services at Dunsfold Aerodrome are unlikely to remain viable, it is considered unrealistic and unviable that bus services can be provided in perpetuity to serve the site. The implications of the failure to secure bus services to serve site in perpetuity would result in a reliance of private car use, resulting in unsustainable development and a severe impact on the highway network local to the site.

Question 9.6

What key non-highway infrastructure measures are required on or outside the site, what are the risks to delivery and the implications for the trajectory from the site? (see also question 3.2)

- 9.6.1 As noted in answer to Question 3.2, the proposals for a new settlement at Dunsfold Aerodrome are associated with a significant quantum of associated infrastructure, both social / community and physical, all of which is critical in order to address the likely impacts of development as well as to provide for a measure of sustainability. In other words, due to the isolated nature of Dunsfold Aerodrome, a significant amount of social and physical infrastructure is needed to even attempt to create a sustainable new settlement. Even then, the extent and range of infrastructure provision is insufficient to create a truly sustainable community, for example there is no secondary school; the quantum of development is likely to be insufficient to support the local shops and services etc. Paragraph 17 (Core Principles) of the NPPF is very clear that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. In this regard, it is questioned as to whether the package of community facilities and infrastructure proposed for Dunsfold Aerodrome will either be sufficient to make the development sustainable, or whether such facilities can be sustained by the quantum of development proposed.
- 9.6.2 Notwithstanding the above, even with the extent of infrastructure identified in the IDP, there is likely to be a significant financial burden upon the development, a significant proportion being required up-front or at the very early stages of the development process. Delaying such infrastructure provision could result in residents and occupiers not having the necessary infrastructure in place for some time.

9.6.3 As a consequence of this inevitable financial burden, there is a risk of delay to the development by virtue of the cashflow implications (cost ahead of development) and the delay (or worse the avoidance) to this much needed infrastructure. Any such delay will undermine the housing trajectory even further.

9.6.4 In this regard:

- I. the proposed bus service will need to be provided in advance of occupations and from thereon in perpetuity;
- II. the new two form entry primary school will need to be provided at a very early stage in the development, requiring design, consent and delivery;
- III. funding for a two form expansion of Glebelands Secondary school (which will require a feasibility assessment followed by its design, consent and delivery), all of which will need to be provided at an early stage;
- IV. the works to the sewage drainage system will potentially need to be completed prior to any occupations. The IDP notes that the most significant impact on the treatment and network capacity across the Borough will arise from Dunsfold Aerodrome. It goes on to note that the developers are proposing to deal with the development's foul water flows by using on-site water treatment. This will require a significant design, assessment, consent and delivery process;
- V. the major water supply resource transfer scheme required from Guildford is likely to take some years to plan and deliver (potentially in excess of 4 years). Indeed, such a project does not currently appear in the WRMP. The IDP notes that Thames Water is working directly with the site promoter's in order to understand the impact of providing new infrastructure which is currently remains unfunded. Consequently, there remains much uncertainty over the ability to secure this without causing delay to the housing delivery or even the more fundamental implications on commercial viability;
- VI. the new health centre will need to be designed as a modular primary care facility with potential for expansion; and NHS England will have to agree to fund the staffing .

9.6.5 The Infrastructure Delivery Schedule contained within the IDP lists further details of the infrastructure anticipated to be required. The extent, costs (both identified and unidentified) and funding gaps for infrastructure identified for Dunsfold Aerodrome are notable. These matters reinforce the concerns about the ability of Dunsfold Aerodrome to deliver according to the housing trajectory set out by the Council.

9.6.6 Therefore, the Council must be satisfied (through robust evidence) that the overall viability and cashflow constraints do not render the proposed development undeliverable, or that the necessary community infrastructure is delayed / pushed back, creating as a consequence both an even less sustainable community in the early years and strain upon existing infrastructure.

Question 9.7

What justification is there for regarding this site as mostly "previously developed land" given that the majority of the site is open and grassed?

9.7.1 We note that the Borough Council previously considered the site to be approximately 22.5% previously developed land. Whilst it is recognised that the 2009 Inspector's findings suggested that the quantum of previously development land was likely to higher than 22.5% (evidence of Paul Falconer to 2009 Inquiry - reproduced on p95 of POW's Comments on the Planning

application dated 7th October 2016), there would not appear to be any evidence to justify the claims that extent of previously developed land constitutes approximately 82% of the land.

- 9.7.2 It is noted that a portion of the site is designated as Ancient Woodland and considerable financial subsidies have been claimed by the owner for the site's use as agricultural land. It could also be argued that a significant proportion of the site has blended back into the countryside and in accordance with the NPPF, would therefore not constitute previously developed land.
- 9.7.3 Nevertheless, even if it was considered that the site constituted predominantly previously developed land, this does not obviate the inherently unsustainable location of Dunsfold Aerodrome for significant development. The approach taken by WBC in placing significant weight on the re-use of PDL at the expense of more sustainable greenfield locations closer to main settlements is not justified. The NPPF (paragraphs 17 and 111) states that Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Clearly, this should not be considered in isolation and the NPPF needs to be considered and read as a whole. In this regard, paragraph 34 of the NPPF states that Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- 9.7.4 Essentially, the NPPF places the presumption in favour of sustainable development at its "heart" (paragraph 14), actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling, and focusing significant development in locations which are or can be made sustainable (paragraph 17).
- 9.7.5 In this regard, the weight to be attached to previously developed land should not outweigh sustainable development principles. It therefore follows that an unsustainable location and development is not made sustainable or in accordance with the NPPF simply because it is previously developed land.

Question 9.8

What will be the effect on the setting of the AONB, particularly important panoramas from viewpoints within the AONB?

- 9.8.1 Please see our response to question 8.3.

Question 9.9

Would the range of employment and retail and social facilities proposed for the site allow for an adequate degree of self-sufficiency or would the scale of development be inadequate to support a critical mass of facilities?

- 9.9.1 We draw attention to the Chase and Partners' report to WBC which reviews the Retail Impact Assessment accompanying the planning application for Dunsfold

Aerodrome. This notes: "*residents in the area of Dunsfold are more likely to continue to use existing, larger centres – particularly Cranleigh – for their day to day shopping and service needs rather than the comparatively small local centre being proposed*".

- 9.9.2 Given the site's remote location, we concur with the above findings. Given our response to question 3.2, regarding the early delivery of infrastructure on site, it is likely that residents will use these existing facilities remote from Dunsfold Aerodrome (e.g. at Cranleigh), hence creating a habitual reliance on other service centres. We note that unlike the bus service, there is no offer or guarantee of these facilities being provided in perpetuity.
- 9.9.3 With regard to employment provision within the site, we note that emphasis is placed upon the site being the largest employment site within the Borough. We also note the claim that the site is an attractive employment site at present. Nevertheless, far greater concentrations of employment are found within the main settlements. POW's close examination of the Applicant's figures suggest that the claimed increase in employment is overstated, especially given the reliance on B8 space that provides relatively little employment. Furthermore, the redevelopment of the site for residential uses and the removal of the airfield function etc, may well limit the attractiveness of this employment site to future investors. In our view, there are more attractive locations for employment provision closer to good transport links and service / population centres. Therefore there is no guarantee that the levels of employment proposed for this site will be delivered / retained in the future.

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