

MINUTES of Plaistow and Ifold Parish Council Extraordinary Meeting held on **Wednesday 28th September 2016**, in Kelsey Hall, Ifold.

Present: Sara Burrell (Chairman); Sallie Baker; Sophie Capsey; Vivien Forwood; Paul Jordan; Paul Reynolds; David Ribbens; Nick Whitehouse; Beverley Weddell (Clerk)

Thirty-seven members of the public were in attendance.

Apologies: Apologies had been received from Phil Colmer, Alan Dormon and Alan Pearson.

ACTION

C/16/104 **Declarations of Interest**

There were no declarations of interest pertaining to agenda items.

C/16/105 **Representations from Members of the Public**

Representations from Members of the Public regarding the Neighbourhood Plan were allowed when that item was discussed. There were no other representations.

C/16/106 **Neighbourhood Plan**

- a) Update: The Chairman reported following numerous consultations with members of the parish, the Neighbourhood Plan Steering Group had moved forward to complete a Pre-Submission Draft Neighbourhood Plan, incorporating the allocation of Land behind the Dairy, Plaistow, as the site to provide 11 dwellings to meet the CDC allocation for the parish of about 10 units.

The business of the meeting was suspended to allow representations from members of the public:

Residents expressed concerns about the proposed allocation of the Land behind the Dairy to provide 11 dwellings. Those concerns related to the impact on the Conservation Area, amenity of neighbouring properties, precedent for future development in Plaistow and traffic. Questions were also raised as to whether other potential sites in the parish had been properly considered.

Ifold residents commented on the large amount of windfall development that Ifold had seen in recent years, which was impacting adversely on the established character of the settlement and causing problems with infrastructure, including sewage capacity leading to flooding of sewage and surface water, and also that Ifold no longer has a shop.

Maggie Williams of Colin Smith Planning explained the reasons that the Ifold brownfield site and CDC allocated site had been discounted following the AECOM Site Assessment and their conclusion that the sites were unsustainable.

Questions were asked about the need for affordable housing in the parish and the Chairman advised that as of June this year there were four people on the housing list with a local

connection. Feedback from the consultations was that people want to see affordable housing in the parish. Affordable Housing can be in the form of low cost rental, shared ownership or discounted property for first-time buyers. She went on to explain that the Neighbourhood Plan was required to meet the identified housing need in the parish, including affordable housing, and that in order to secure affordable housing it was necessary to allocate one site for 11 dwellings as developments of 10 dwellings or fewer could pay a commuted sum to CDC to provide affordable housing elsewhere in the District.

In response to a question about whether the closure of the shop in Ifold was the reason Ifold was considered unsustainable, the Chairman explained the three stands of sustainability in the NPPF as being economic, social and environmental, and that the neighbourhood plan had to meet the sustainability criteria.

A resident asked how the proposed site behind the Dairy had come forward and it was explained that it had been suggested by a member of the public through a Call for sites at a recent consultation, which the steering group had followed up.

The Chairman pointed out that the housing allocation is just one element of the plan and that there are other aspects that provide benefit to the community.

The business of the meeting resumed.

- b) After full consideration, it was unanimously agreed that the Pre-Submission Draft Neighbourhood Plan and Site Map for the Land Behind the Dairy, Plaistow, as circulated, be approved for submission to CDC to carry out a Screening process to consult the Environment Agency, Historic England and Natural England as statutory consultees.

It had been resolved at the parish council meeting on 13th September that the site Land Opposite the Green, Plaistow, would be a reserve site in the event that Land behind the Dairy was unable to proceed following consultation with the statutory bodies, and this was confirmed. (This would enable the steering group to produce a replacement Draft plan incorporating the reserve site if necessary, however, that would be subject to approval by the parish council before the Screening process could go ahead.)

C/16/107 Recent planning decisions for information

PS/16/01622/DOM Open porch extension to front. Little Greenwood, The Drive, Ifold. **Permit**

PS/16/01627/PNO Prior notification of agricultural building. Swear Farm, Dunsfold Road, Plaistow. **Prior notification not required.**

PS/16/01543/PLD Demolition of existing conservatory and construction of rear and side extension. Oakwood House, Chalk Road, Ifold. **Permit**

PS/16/01331/DOM Conversion of loft space into habitable room and installation of roof windows. Chase House, The Drive, Ifold. **Permit**

PS/16/01305/DOM Proposed greenhouse. Chase House, The Drive, Ifold. **Permit**

PS/16/01267/DOM Extension and alterations to existing dormer. Catbells, Durfold Wood. **Permit**

PS/16/01314/TPA Treework. Chequer Tree House, Plaistow Road, Ifold. **Permit**

PS/16/02101/TPA Treework. Roughlands, Durfold Wood, Plaistow. **Permit**

PS/16/02006/DOM Single storey rear extension. The Martins, 6 Oakfield, Plaistow. **Permit**

PS/16/02703/TPA Treework. Wagtails, 11 The Close, Ifold. **Refuse**

PS/16/02524/TPA Treework. Chase House, The Drive, Ifold. **Permit**

PS/16/02357/ELD Change of use of former milking parlour to 2 no. dwellinghouses. The Annexe and Tipplers Retreat, Shillinglee. **Permit**

PS/16/02356/FUL Replacement of existing building with 3 no. 2 bedroom dwellings. Courtlands, The Drive, Ifold. **Permit**

PS/16/02293/DOM Alteration of existing rear window to French doors. Little Killy, The Drive, Ifold. **Permit**

C/16/106

Planning Applications

After full considerations of the following planning applications, the parish council resolved to comment as follows:

- a) PS/16/02841/FUL Proposed demolition of existing farm building and construction of a dairy unit with associated infrastructure, access and replacement of workers' accommodation. Crouchland Farm, Rickmans Lane, Plaistow. **Letter of objection appended.**

It was noted that Peter Curtis of Crouchland was invited to attend the meeting, but was unable to attend due to short notice. A request had been received from Mr Curtis for the meeting to be cancelled due to the lateness of the parish council's invitation for him to attend, however, it was noted that the parish council is not required to invite planning applicants to attend parish council meetings and that the agenda had been published on the website and village notice boards. A representative of Crouchland's PR company was in attendance.

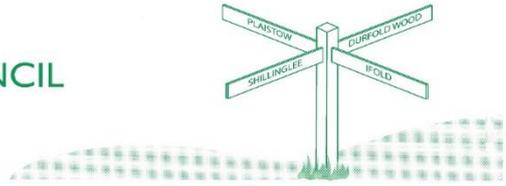
- b) PS/16/03032/DOM Extension and alterations to ground and first floor. Loxacres, Chalk Road, Ifold. **No objection.**
- c) PS/16/02808/FUL Variation of condition 2 of planning permission PS/15/01348/FUL To increase width of garage. Northwood, The Drive Ifold. **No objection.**
- d) Waverley Draft Local Plan Consultation. A draft letter of response had been circulated prior to the meeting and it was agreed that the Clerk and Mrs Capsey would finalise the letter for submission. **Letter of response appended.**

C/16/107

Next Meeting

Tuesday 18th October, 7.30pm, Full Council at Kelsey Hall

PLAISTOW AND IFOLD PARISH COUNCIL



7 October 2016

Ms Claire Coles
Planning Officer
Chichester District Council
East Pallant House
1 East Pallant
Chichester
PO19 1TY

Dear Ms Coles

Re: PS/16/02841/FUL Proposed demolition of existing farm building and construction of a dairy unit with associated infrastructure, access and replacement of workers' accommodation. Crouchland Farm, Rickmans Lane, Plaistow.

Plaistow and Ifold Parish Council objects to this application.

The scale and nature of the proposals are such that it is open to question whether this is industrial rather than agricultural development being proposed on this site. While 'dairy farming' falls within the meaning of 'agriculture', as set out in section 336 of the Town and Country Planning Act 1990, it is unlikely that the type of activity proposed in this application was in the minds of those who originally drafted the definition contained in the legislation.

The scale and mass of the proposed structure would have a major impact on the landscape and rural character of the area, being completely out of character with its surroundings. Of particular concern is the severe impact the proposed structure would have on the visual setting of the adjacent Grade II Listed Buildings. In particular Crouchlands Farmhouse, constructed by one of the foremost families, the Strudwicks, in the Parish of Plaistow and Kirdford. The deciduous tree belt is inadequate to protect the setting or to minimise the impact of the industrialised entrance created by this scheme.

The application includes for the construction of a 60m x 72m silage clamp. The parish council would request that the Council seeks the advice of its agricultural advisor to ensure that a silage clamp of such a size is required and justified for the farm use alone.

The parish council has concerns that 274.8m² of the proposed development is for B1(a) use. We do not agree that permission is required for B1 use in this case if the office space is incidental to the agricultural use; all farms have offices but we are unaware of any having separate B1 Use. Should the Council consider that permission for B1 Use is required, the parish council would request a condition requiring that it is limited to the incidental use of the agricultural facility.

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**Clerk: Mrs Beverley Weddell. Tel: 01483 200314.
Lock House Lodge, Knightons Lane, Dunsfold GU8 4NU
clerk@plaistowandifold.org.uk**

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No drawings or detailed information are provided relating to the proposed alteration and refurbishment of the existing farm buildings, which appears to be an integral part of the application. This information must be provided to enable full and proper consideration of the application.

Increase in HGV and other vehicle movements:

The Webbbaton Agricultural Needs Appraisal advised that 1300 animals will be housed on the farm, of which 550 will be in the 11500m² dairy building, which is the subject of the Transport Statement. However, the remaining 750 will be housed in the altered/refurbished farm buildings for which the Transport Statement appears to take no account. The new building and the altered/refurbished buildings will allow for an increase in the utilisation of the farm AD for which no statements or assessments have been prepared.

The Transport Statement fails to account for any vehicle movements associated with the 750 animals housed in the altered/refurbished farm buildings or the vehicle movements associated with the increased off farm digestate disposal generated by the increased utilisation of the farm AD resulting from the increase in farmyard muck, cow slurry, dirty water, parlour washings etc. from the full 1300 animals housed on the farm. A Transport Statement should be provided to account for all vehicle movements required by the farm activities in total not just the dairy element in isolation.

As stated above, the cumulative effects of the development must be considered with the current AD facility operation and the proposed enlarged AD facility, subject to Appeal. The parish council is concerned that the cumulative effect of this application would be a further significant increase in vehicle movements associated with the farm, in addition to those from the AD facility, including an increase in HGVs using local roads previously deemed by West Sussex Highway Authority to be unsuitable for such use and detrimental to highway safety. Tractors and trailers are a comparable weight and size to HGV lorries.

Impact on residential amenity:

The Noise Assessment considers the effect of the new dairy but takes no account of the other parts of the farm housing the 750 further animals or the farm AD into which the very considerable increased quantity of farmyard muck, cow slurry, dirty water, etc. is to be recycled for energy recovery. The application affects the operation of the whole farm as a unit and the Noise Assessment should take into account the whole farm and all its operations including the increased AD operation that would result from the increased dairy herd. Furthermore, the Noise Assessment fails to take account of noise associated with vehicle movements.

Likewise, the Odour Assessment only considers the effect of the new dairy, but takes no account of the other parts of the farm housing the 750 further animals, or the farm AD. The new dairy cannot be considered in isolation and the Odour Assessment should be a cumulative assessment of the farm as a whole unit.

Damage to the natural environment:

The parish council is concerned that the application would adversely impact on the protected and rare species including, inter alia, bats and owls. In addition, that the location of development would have a detrimental effect on the adjacent Ancient Woodland.

Waste disposal:

The parish council has been advised that technically there would be issues with the AD processing such large quantities of farmyard muck and cow slurry without the introduction of other feedstock types to allow the AD process to function correctly. This raises concerns that there would be a need to import feedstock contrary to the recent CLU decision.

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Agricultural Assessment:

The raison d'être for the application is to update a loss making dairy operation. It would therefore seem an appropriate planning matter to consider, as part of the agricultural appraisal, the business plan and financial viability of the application. It is customary for an application of this nature to be accompanied by a Business Plan, to justify proposals and ensure their validity. The parish council would request that a Business Plan be submitted.

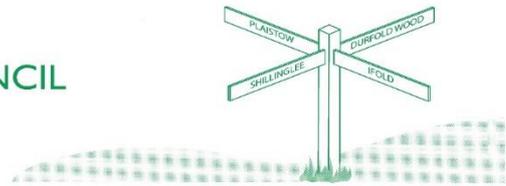
An application must be assessed on its own merits, however, the cumulative impact of developments must also be taken into account. The parish council is strongly of the opinion that this application is premature and should not be determined until the outcome of the pending appeals are known (APP/L3815/C/15/3133237; APP/L3815/C/15/3133236; APP/P3800/W/15/3134445.) Should the Planning Inspector determine that currently unlawful development on the site should be removed, it may be considered that the dairy unit and associated infrastructure that is the subject of this application would be more appropriately located within the existing farm yard. Furthermore, in the event that only the consented 2007, 2008 and 2011 equipment is permitted, there is insufficient capacity to manage the waste from the proposed increased dairy, in particular the storage of digestate for 5 months from the dairy scheme because there would be no digester 3, no large lagoon and no lagoon number 4. Therefore, Plaistow and Ifold Parish Council strongly requests the Council to refuse this application or refuse to determine the application until the outcome of the above appeals is known.

Plaistow and Ifold Parish Council realises that animal welfare is not a material consideration in planning terms, however, we acknowledge the objections to the application on these grounds from residents and we endorse the letter of objection submitted by Compassion in World Farming.

If the Council is minded to approve the application, the parish council would request conditions restricting the office space and worker's accommodation to be restricted to use incidental to the agricultural unit. We would also request that permitted development rights be removed.

Yours sincerely

Beverley Weddell
Clerk to Plaistow and Ifold Parish Council



1 October 2016

Planning Policy Team
Planning Services
Waverley Borough Council
The Burys
Godalming
GU7 1HR

Dear Sirs

RE: Pre-Submission Local Plan Part 1: Strategic Policies and Sites.

Plaistow and Ifold Parish Council has considered the Pre-Submission Local Plan Part 1 consultation document and comments as follows.

1. Comments by individual paragraphs

Paragraph 5.23: Plaistow and Ifold Parish Council considers that this is a subjective view based on assumptions. As the Council has stated elsewhere The inclusion of the site as a major allocation in the Plan is still subject to the provision of appropriate infrastructure to mitigate the impact of development, particularly improvements to the road network.

Paragraph 5.25: Plaistow and Ifold Parish Council comments that more importantly, what is not mentioned is that the Spatial Strategy does not distribute development evenly across the Borough than would be the case if it were to be distributed in proportion to housing need. Furthermore, the AECOM 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, therefore it does not indicate that distributing development disproportionately in the south east of the Borough is the most sustainable option.

Paragraph 6.2: Plaistow and Ifold Parish Council is encouraged that WBC has already identified a 5-year supply of deliverable sites. The parish council agrees that identifying a supply of specific developable sites for growth for years 6-10 is also essential, however, the parish council considers that the council is making too many assumptions in allocating Dunsfold Park at this time, having clearly stated in this document that any development at Dunsfold Park is subject to the inclusion of appropriate infrastructure to mitigate the impact of the development. Therefore, Plaistow and Ifold Parish Council considers that it would be irresponsible for WBC to move forward with a 19-year plan on the basis of allocating a site when it is not, as yet, known whether that site can deliver sustainable development. It states in this paragraph that the *NPPF outlines that Local Plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the framework*; Plaistow and Ifold Parish Council is of the opinion that the Council has failed to adequately consider NPPF Paragraph 14 which states *“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”* Examples are then

given including “those policies relating to sites protected under the Birds and Habitats Directives, and/or designated Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, designated heritage assets, locations at risk of flooding”. We can find no evidence to show that the Council has fully considered the adverse impacts that would arise from meeting the OAN, notwithstanding our comment in Paragraph 6.6 below.

Paragraph 6.6: Plaistow and Ifold Parish Council endorses the report carried out by NMSS for joint parish councils, which states that if the most recent ONS baseline figures are used the need for housing in Waverley is reduced to 400 +/- 30 dwellings per annum.

Paragraph 6.10: Given the parish council’s comments in 6.2 and 6.6 above, we request that the Council updates the SHMA and recalculates the OAN using the latest government statistics and removes Dunsfold Aerodrome (Policy SS7 from the Plan).

Paragraph 6.21: As previously stated, Plaistow and Ifold Parish Council considers that Dunsfold Aerodrome should not be allocated in this plan as it is not known whether infrastructure and transport issues can be satisfactorily addressed. Further, the Council has not justified its classification of Dunsfold Aerodrome as ‘Brownfield’, or what proportion of the site it considers ‘Brownfield’. At the time of the 2009 Appeal the Council claimed that PDL amounted to 22.5% of the site; in his conclusions, the Inspector recorded that there were conflicting views on PDL, that there was no dispute that the area containing the hangars and other buildings in the north constituted PDL, that the Rule 6 parties had maintained that this was the only PDL, but that his view was that the runways, taxi ways, perimeter road and interstitial grassed areas were also PDL. However, the Inspector made no conclusion as to the percentage of the site which amounted to PDL, therefore Plaistow and Ifold Parish Council considers there is no justification that PDL amounts to 82% of the site, particularly given that a portion of the site is designated Ancient Woodland and considerable EU supplements have been claimed by the owner as agricultural land.

POLICY ALH1: The Amount and Location of Housing: Plaistow and Ifold Parish Council queries why the Council is not proposing that the full number of LAA sites in Milford/Witley be allocated in the Plan when there is such a disproportionate allocation of sites in Cranleigh and when the location of Milford/Witley makes it more sustainable, particularly in transport terms.

Paragraph 7.5: The Allocation of 2600 at Dunsfold Aerodrome, which is in an extremely isolated location, flies in the face of NPPF Paragraph 34, notwithstanding Paragraph 29 that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. The NPPF does not state that it is acceptable to ignore maximising sustainable transport modes if a proposed site is in a rural isolated location.

Paragraph 7.9: Plaistow and Ifold Parish Council would welcome improvement projects that could utilise public rights of way to encourage users onto the ProW network, particularly routes that connect to this parish, however, the parish council does not consider it is realistic to expect the routes to be used for any means other than recreation, given the vast distances on very hilly terrain that would be required to access services in remote areas such as Dunsfold Aerodrome, therefore we do not consider that this proposal is relevant with regard to sustainable transport and only has relevance with regard to recreation.

Paragraph 7.10: Measures to manage traffic growth and tackle local congestion hotspots are fundamental to the success of this plan and the future of the borough. Without the certainty that suitable measures are possible, this plan is unsound.

Paragraph 7.17: Mention is made of the work carried out by Mott MacDonald, however, their conclusions do not appear to have been taken into account. The Stage 4 report states: For residents in a new Dunsfold development, internal trips to work are assumed to be made by walking and cycling. Therefore, encouraging sustainable travel modes would have to address external trips away from the site. 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. Farnham is considered to be the most sustainable location for provision of new homes given its current transport options and the potential to address local car trips by transferring them to other modes, followed by Cranleigh and then Dunsfold. It follows that Scenario 1 of the development scenarios (no development at Dunsfold Park) is considered the most sustainable.

Policy ST1: Sustainable Transport. Allocation of Dunsfold Park for 2600 houses goes against this policy “to ensure that development schemes are located where it is accessible by forms of travel other than the private car.” Dunsfold Park is not accessible by forms of travel other than the private car for the majority of people. To quote Mott MacDonald “it is difficult to see how increases in sustainable travel could be encouraged at the Dunsfold site.”

Policy RE1: Whilst the parish council recognises the need to protect land within the Green Belt, this should not be at the expense of Countryside beyond the Green Belt which should be given equal protection. This policy is a ‘watered down’ version of the Local Plan 2002 Policy C2 and as a consequence our countryside is being afforded less protection. Plaistow and Ifold Parish Council proposes that Policy RE1 be rewritten as the previous Policy C2 to state “In the Countryside Beyond the Green Belt and outside rural settlements, the countryside will be protected for its own sake. Building in the open countryside away from existing settlements will be strictly controlled.”

Policy RE3: Plaistow and Ifold Parish Council fully supports this policy. However, the allocation of Dunsfold Aerodrome for 2600 houses goes against this policy, particularly in respect of the harm to the view from Hascombe Hill in an area which is currently visible as open grassland, which would become a dense urban area with little or no tree protection. In addition, the impact of increased traffic on the rural network of country lanes that bisect the Surrey Hills AONB will destroy the character that makes these lanes and villages so special. In addition, this policy states that the same principles for protecting the AONB will apply in the Area of Great Landscape Value (AGLV), which will be retained for its own sake and a buffer to the AONB, until there is a review of the Surrey Hills AONB boundary. Plaistow and Ifold Parish Council fully supports this but notes that part of the Dunsfold Aerodrome allocated site is in an area designated AGLV, therefore goes against this policy on this point also.

Paragraph 18.1: As previously stated, the Council is making assumptions that development at Dunsfold Park can be mitigated in order to make it sustainable. Therefore, the proposed allocation of Dunsfold Park as a strategic site does not provide any certainty of delivery.

Paragraph 18.13: Plaistow and Ifold Parish Council agree with other parish councils who maintain that only 22.5% of the site is PDL, which was the view of the Council at the 2009 appeal inquiry. In justifying why the Council now considers that 82% of the site is PDL reference is made to Para 98 of the 2009 appeal decision. In fact, Para 98 refers to the applicant’s claim that 86% was PDL, it is not the Planning Inspector’s opinion. Furthermore, the Council has failed to take into account the rural and agricultural character of the majority of the site.

Paragraph 18.14: Plaistow and Ifold Parish Council would agree that much has changed with regard to government legislation since 2009, and notwithstanding any adjustment of congestion in respect of traffic, the increase in traffic density due to development will inevitably increase the danger of injury. There is no new infrastructure proposed and Dunsfold Park is still an isolated site. A desperation to find housing sites to meet a perceived housing need does not make the site any more sustainable than it was in 2009. Plaistow and Ifold Parish Council concludes the Council has paid little regard to the 2009 appeal decision and considers that Dunsfold Park is in an unsustainable location now as it was in 2009.

Paragraph 18.16 Plaistow and Ifold Parish Council strongly disagrees with the Council that Dunsfold Aerodrome can deliver sustainable development. Dunsfold Park is in a totally isolated location. As Mott McDonald concluded in their Part 4 Report for the Council *Given the location, walking to other work locations is unlikely as 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.* Plaistow and Ifold Parish Council considers that because of the isolated location of Dunsfold Park, the need to travel cannot be minimised and the use of sustainable transport modes is not viable, a major development at this site flies in the face of the policies in the NPPF. Therefore, allocation of this site forming such a major element of the Plan renders the Plan unsound. Furthermore, notwithstanding the harmful impacts that would arise out of major development in this unsustainable location, the benefits must also be questioned. The majority of the housing need in Waverley derives from the west of the borough, mainly in Farnham, therefore to provide such a large proportion of the required homes in the east of the borough cannot be considered sustainable on social grounds, particularly given the poor east-west road and rail connections in Waverley. The AECOM Sustainability Appraisal states that *there is some uncertainty in respect of 'Community and wellbeing' (is the site too isolated?)*. Plaistow and Ifold Parish Council considers that it would be irresponsible to allocate such a large number of homes to be built in this rural and isolated location whilst there remains any uncertainty in respect of community and wellbeing.

Paragraph 18.19: B8 use, which attracts a considerable amount of HGV traffic, is not suitable in this isolated rural area. Given that Table 10.1 Balance of Need/Supply for Employment Floorspace in 2033 projects a surplus of B8 floorspace of 57,102sqm, Plaistow and Ifold Parish Council fails to see a justification for allocating an additional 26,000sqm of B class floorspace at Dunsfold Aerodrome, when it is acknowledged that a high proportion of this would be for B8 use. Indeed, there is a projected surplus across the B use classes of 81,817sqm when development at Dunsfold Aerodrome is taken into account. Given that existing small business units in Ifold have been left empty for a number of years despite extensive marketing and that units at Alfold Business Centre have been given permission to convert to residential use after providing evidence that the B1/2 Use Class is not viable, Plaistow and Ifold Parish Council questions why the Council is planning for an increase of B class employment floorspace in this area of the borough.

Paragraph 18.21: Plaistow and Ifold Parish Council has seen no evidence that a package of highway infrastructure and sustainable transport measures can be delivered in conjunction with the development of a new settlement at Dunsfold Aerodrome. The mitigation measures proposed by DAL in their current application for 1800 homes are judged to be inadequate by Vision Transport in a review of the latest transport assessment submitted by DAL. The review, commissioned by joint parish councils, concludes *"the proposals fail to meet national, regional and local policies in respect to sustainable development and transport. In the most basic sense it is concluded that the development proposals are in the wrong location and cannot be made accessible by the sustainable mitigation measures that are proposed. The development proposals will be 'car dependent' and based on the evidence set out within the replacement Vectos Transport Assessment will be likely to result in 'severe' impact on the wider highway network both in terms of capacity, congestion and road safety."*

Paragraph 18.22: As stated by Mott MacDonald in their Part 4 report for the Council, *given the location, it is difficult to see how increases in sustainable travel could be encouraged at the Dunsfold site.* It cannot be guaranteed that improvements to bus routes can be sustained in the long-term. Additional and improved cycle paths are welcomed, however, taking into account the terrain and distances, these will be used primarily for recreation than for commuting and access to essential services.

Paragraph 18.25: Plaistow and Ifold Parish Council is particularly concerned about the lack of facilities, including primary school places, in the early phases of development. **It is essential that necessary facilities such as schools and medical services are in place prior to homes being occupied.**

Paragraph 18.26: Plaistow and Ifold Parish Council considers that until it is known how or whether the impacts of the development on local infrastructure and services, including at Cranleigh, can be addressed, that such a major isolated development cannot justifiably and reliably form such a major part of the Local Plan.

Policy SS7: New settlement at Dunsfold Aerodrome: Plaistow and Ifold Parish Council strongly objects to a New settlement at Dunsfold Aerodrome.

Dunsfold Aerodrome is in an unsustainable location. This was the view of Waverley Borough Council when the previous application for 2601 houses was refused in 2008, a decision upheld by the Planning Inspector and Secretary of State at the 2009 appeal. This was also the view of the Government when the application for the site as an eco-town was refused.

It is recognised by planners that a new settlement of up to 2600 dwellings in a remote rural location is too small to have the necessary self-containment to be a sustainable community.

There is no major infrastructure proposed to address problems caused by the isolation of the site, such as new road or rail links. Plaistow and Ifold Parish is already suffering the damaging impacts of increased HGV traffic on rural lanes that were never designed to take this sort of traffic.

The site provides affordable housing where it is not needed. It is agreed that houses need to be built to help young people get on the housing ladder, however, it is wrong to dump these houses in the middle of nowhere with inadequate facilities. Plaistow and Ifold Parish Council has grave concerns about the social implications of providing such a large amount of affordable housing where residents will have no existing local connection.

The residual cumulative impacts of a new settlement at Dunsfold Aerodrome and the proposed additional housing in Cranleigh and the neighbouring villages would be severe on transport grounds.

Paragraph 19.2: Plaistow and Ifold Parish Council is of the opinion that the Council will find it very difficult to resist inappropriate development on strategic sites allocated in this plan, but we also acknowledge that it is vital to have a Local Plan in place to protect the Borough from inappropriate development and unwanted development being given planning permission at Appeal, therefore we would strongly request that the Council reviews the SHMA taking into account the most recent ONS baseline figures as recommended in the NMSS report, which would enable the Council to remove Dunsfold Aerodrome, which would appear to be the most uncertain site in terms of sustainability and viability, from this plan. Alternatively, we would request a Local Plan that covers a shorter period, so that the Council allocates only those sites that it can be certain can be delivered sustainably.

2. Plaistow and Ifold Parish Council considers the Local Plan Part 1 unsound for the following reasons:

The plan is not justified:

- being based on an out-of-date SHMA and OAN
- being based on allocating 45% of development in the east of the borough when the evidence shows that 57% of housing need originates from the west of the borough
- ignoring own evidence that casts doubt over the sustainability of a key strategic site^{1,2}
- failing to adequately explore all options to distribute housing sustainably around the Borough
- lacking evidence that other sustainable spatial strategy options have been considered, with consultants only being employed to consider options that include Dunsfold Aerodrome
- following a flawed consultation in 2014. The Making Waves consultation was developer-led, having three out of four possible scenarios based on significant

- development at Dunsfold Aerodrome based on assumptions that development at DA could be sustainable despite the conclusions of the 2009 Appeal and Secretary of State's ruling that Dunsfold Aerodrome is located in an unsustainable location and invited a 'NIMBY' response whereby the most populated areas of the Borough 'voted' for the options that would least affect them
- providing a substantial surplus of B Use Class floorspace
- containing inconsistencies in that the allocated sites do not meet the plan's key policies, particularly in relation to Dunsfold Aerodrome

The plan is not effective:

- relying on one strategic site to deliver a significant proportion of the perceived housing target, despite being in an unsustainable location
- delivering housing in parts of the Borough where there is not the greatest housing need
- failure to maximise opportunities to enhance and protect the unique rural character of Waverley that makes it special
- failure to demonstrate how practically and financially measures can be put in place to mitigate against the cumulative impacts of development on transport
- failure to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion

The plan is not consistent with policies in the NPPF:

- Paragraph 14. Waverley's Objectively Assessed Need is out of date and should be reviewed. There is no evidence that the adverse impact of development at Dunsfold Aerodrome has been adequately considered, furthermore, Plaistow and Ifold Parish Council considers that the benefits of development at the aerodrome are limited as housing would be delivered where it is not needed. Therefore, the parish council is of the opinion that the impacts of meeting a perceived OAN would significantly and demonstrably outweigh the benefits and as such development should be restricted.
- Paragraph 34. Plans 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. Allocating a strategic site at Dunsfold Aerodrome, which is an isolated and rural location, where residents will be car dependent and where there is no realistic opportunity for sustainable travel cannot comply.
- Paragraph 35. No high quality public transport facilities exist near the proposed new settlement at Dunsfold Aerodrome and none are planned, therefore the plan cannot comply.
- Paragraph 54. The allocation of strategic sites in this plan does not reflect local needs, particularly for affordable housing.
- Paragraph 55. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside. The proposed new settlement at Dunsfold Aerodrome goes completely against this paragraph.
- Paragraph 84. Sustainable patterns of development are not promoted in this plan, and development is channelled away from urban areas towards unsustainable greenfield sites beyond the Green Belt. The proposals mean that countryside beyond the Green Belt is sacrificed to preserve the Green Belt itself resulting in a plan that fails to provide sustainable development.

3. Plaistow and Ifold Parish Council recommends the following changes to the Pre-Submission Draft Local Plan Part 1:

- a)** The housing target on which the Plan is based should be modified by;
 - i) Updating the SHMA and recalculating the OAN using latest government statistics.
 - ii) Removing any backlog in housing supply for the years 2013-2017 from the housing needs assessment.
 - iii) Revising the Housing Trajectory in accordance with i) and ii) above.

- b)** The Spatial Strategy should be revised to remove Dunsfold Aerodrome as a Strategic Site (Policy SS7) and to;
 - i) Adjust the housing allocation to sites that are spread around the Borough proportionately and equitably in terms of local need; for example, by utilising smaller brownfield sites for housing rather than reserving them for industrial use that is surplus to the requirements identified in the Plan.
 - ii) Review other small sites for housing rejected by the Land Availability Assessment (LAA) for possible inclusion in the Plan and prioritising sites that are accessible to railway stations and trunk roads.
 - iii) Develop more fully researched, funded and programmed IDP.
 - iv) Consider that the OAN cannot be fully delivered in a sustainable manner.

Plaistow and Ifold Parish Council endorses in principle the responses submitted by Surrey Hills AONB, CPRE and the Protect Our Waverley Campaign.

Yours faithfully

Beverley Weddell
Clerk to Plaistow and Ifold Parish Council