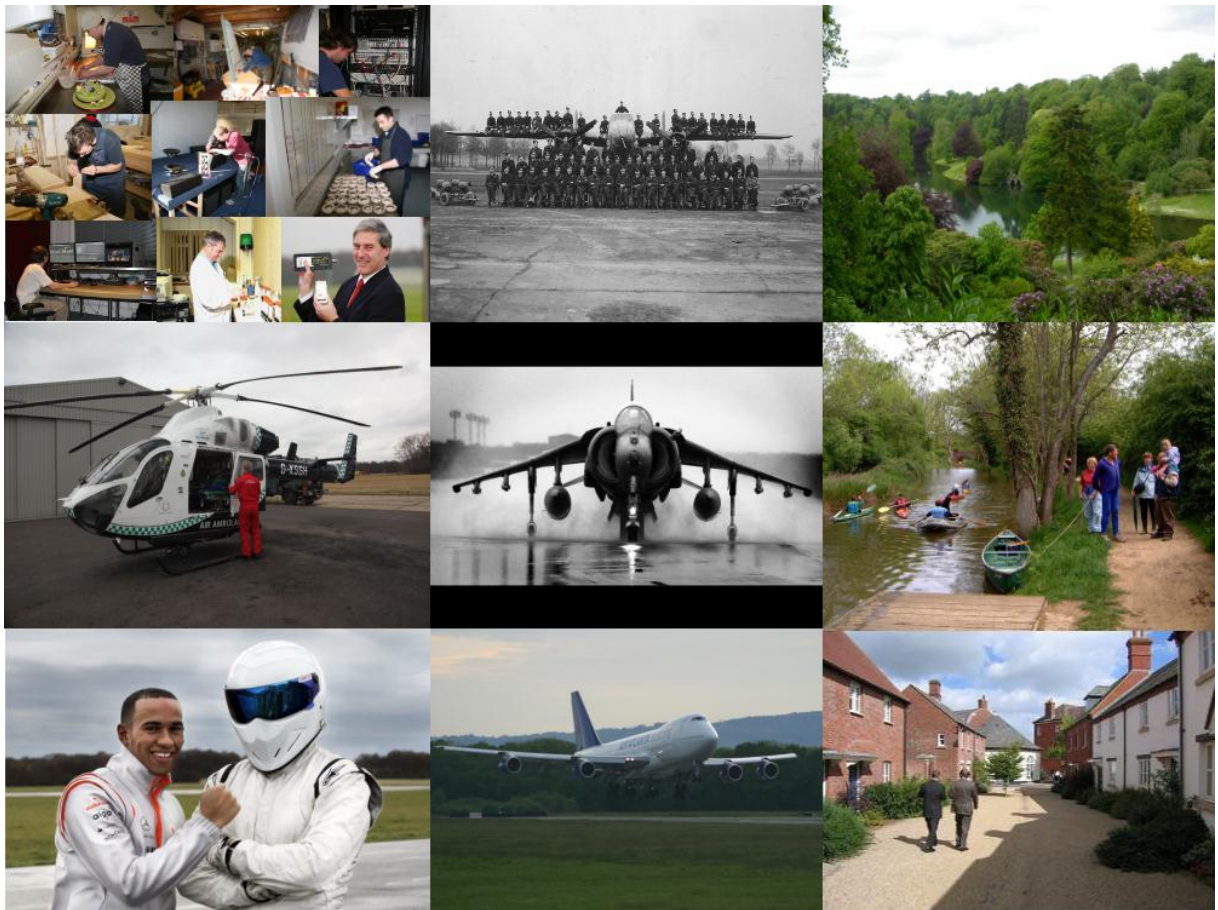


The Future for DUNSFOLD AERODROME?



By Lord Matthew Taylor

SEPTEMBER 2012



Dunsfold Aerodrome

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SUMMARY

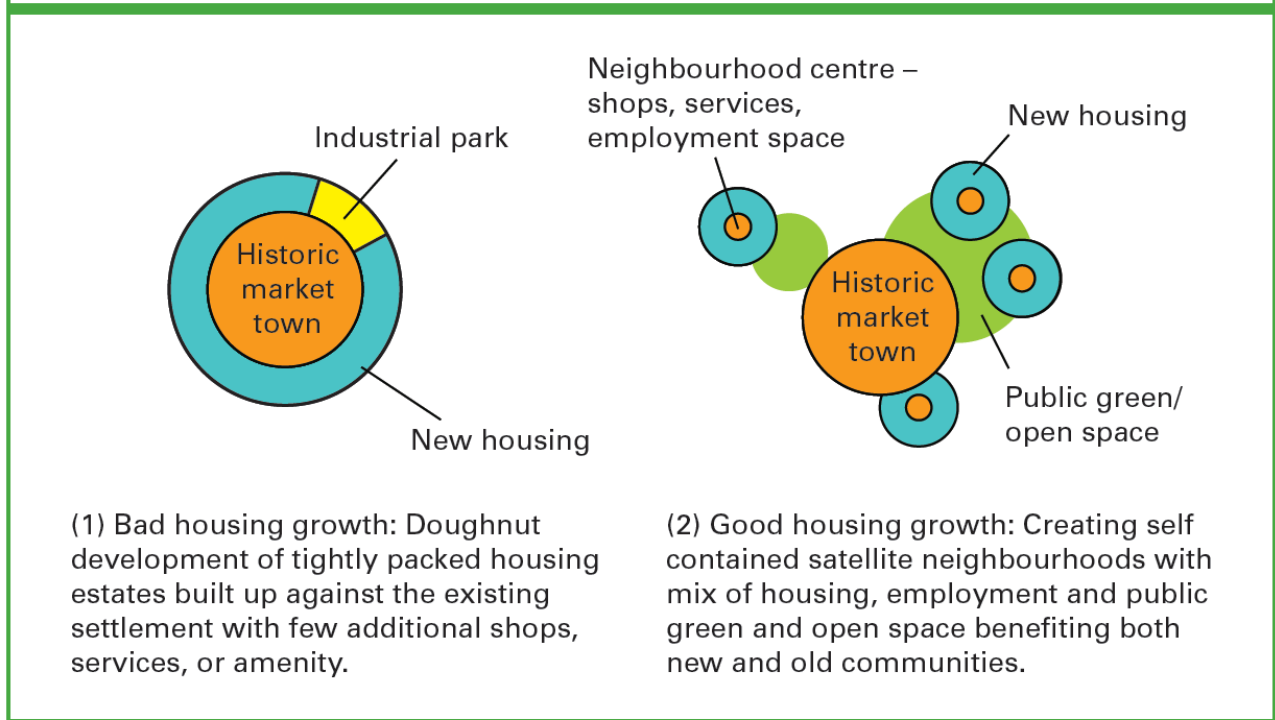
1. Built by the Royal Canadian Air Force, Dunsfold Aerodrome has been in aviation use since 1942. From 1946 to 1951 it was occupied by Skyways, an air-charter company. It was then taken over by Hawker Aircraft Limited, later British Aerospace, who gained in 1951 permanent planning permission for the manufacture, repair and flight-testing of aircraft.
2. The present owners acquired the site in 2002, after British Aerospace (BAe) vacated it with the loss of 1100 jobs. Before that BAe, Waverley Borough Council (WBC), Surrey County Council (SCC) and Surrey Economic Partnership had jointly commissioned WS Atkins to review options for the future of the site. Their report concluded that (given the priority was *'maintaining the status quo'* - presumably to protect the existing skilled staff and the economic benefits to the community) two options were potentially viable: continued aerospace and aviation-related activities, and/or high quality employment orientated to growth and technology (leveraging the existing workforce's skills base). The third viable option *'from a commercial, economic and environmental point of view'*, once BAe had closed the site, would be *'an imaginative and balanced mix of residential, employment and recreational activities and community support, at sufficient critical mass to become self-reliant in sustainability terms'*.
3. In the event, the closure took place prior to the Aerodrome's purchase by Dunsfold Park Ltd (DPL). They have subsequently generated replacement employment at the site amounting to some 700 jobs through leasing and letting premises to 100 businesses both in the complex of commercial buildings, and through various aviation related and other uses of the runway complex. The latter, however, have been through arrangements of a short term nature as DPL has refused approaches that involved longer term aviation investments, pursuing instead the objective of a mixed-use 'eco-village' replacing the Aerodrome, similar to the WS Atkins Option 3.
4. Over the first five years (2002-7) of their ownership, various preliminary discussions took place between DPL and WBC over possible future development of the site. In 2003 WBC established the first Special Interest Group (SIG) to inform its approach, but this work was aborted in 2004 when the 2004 Planning Act substantially changed national planning policy.
5. In 2007 WBC was told (pre-inquiry) by the Inspector that its then draft Core Strategy, responding to the 2004 Act, was likely to be found unsound, and the Council therefore withdrew it. WBC started the process of revising the draft, but with no Core Strategy likely to be in place for some years DPL decided against delaying their plans until it was completed. They submitted to WBC in 2008 their outline application for a new settlement. This would have comprised 2,601 residential units, (of which 910 were to be affordable homes for rent or part ownership at below market rates), shops, cafe, pub to meet local needs, and a variety of services including a primary school, health, social and leisure facilities, with around 350 acres of publicly accessible lakes and parkland. The existing 45,000 sq metres of business space would have grown to 60,000 sq metres.

6. The design team summarised their vision as follows:
- Create a new concept in rural living and an inspiring place to work
 - Provide different types and sizes of homes for local residents, including affordable homes in a compact settlement
 - Provide an excellent range of community facilities and local amenities
 - Incorporate innovative environmental techniques to minimise waste consumption and provide green energy
 - Create new public transport links, as well as walking and cycling connections to surrounding villages
 - Expand the existing business park to generate new employment for local people
 - Provide public access to large areas of landscaped parkland and lakes
 - Promote local agriculture and forestry
 - Celebrate the aviation history of Dunsfold Aerodrome by developing an aviation museum
 - Improve the quality of life in the Cranfold community ('Cranfold' references the cluster of some 13 villages surrounding the Aerodrome)
7. The application was refused by WBC, a decision supported by the appeal Inspector and upheld by the Secretary of State in September 2009. WBC had argued against the proposal on a number of grounds, but a significant number of those arguments (summarised for WBC in the closing statement by Timothy Mould QC) were firmly rejected by both the Inspector and the Secretary of State. Amongst the arguments presented by Mr Mould for WBC but rejected in the appeal conclusions were:
- i That the superlatives used by those supporting the scheme were *'hyperbolic'*: The Inspector concluded the excellent sustainability of the scheme *'would compare favourably with other leading schemes both in the UK and abroad'*. The Secretary of State gave considerable weight to the fact that it was (and remains) the only development scheme ever supported by national Friends of the Earth.
 - ii That the proposal would have *'a significant and negative impact on a view from the Surrey Hills AONB'*: The Secretary of State in complete contrast concluded the development would have *'less visual impact'* than the existing Aerodrome.
 - iii That the large number of affordable homes proposed provided *'no justification'* for making an exception to the local and regional policies regarding spatial strategy: The Secretary of State on the contrary gave them *'substantial weight'* given the *'severe shortage of affordable housing in Waverley'*, and the *'social and economic consequences of failing to deal with them'*.
 - iv That there was *'no justification'* for prioritising letting the affordable housing to those working on the site on sustainability grounds: On the contrary, the Inspector described DPL's proposed lettings policy as *'entirely reasonable'*, and the Secretary of State agreed that they accorded with both the aims of the scheme and with the South East Plan.

- v That *'there is no need and no case'* for the scheme to meet Waverley's housing requirements under the South East Plan and national policy:
In contrast the Secretary of State concluded that 'in regard to the Inspector's comments that the Council faced a challenge in deciding how to accommodate the residual SEP housing requirement for Waverley to 2026 ...the appeal proposal has many advantages'.

8. Timothy Mould QC also argued in his closing statement on behalf of WBC that my own then recently published 'Taylor Review' of rural planning policy (an independent review for the last Government) did not support the scheme. Specifically, that my "hub and spoke" recommendation for meeting housing needs around existing rural communities *"envisages a form of mini urban extension"* and that *"clearly the appeal site cannot achieve that kind of symbiotic relationship with Cranleigh, for the simple reason that it is too far distant and separated by a major County road – the A28"*
9. In fact however, I argued at paragraph 23 of the Taylor Review specifically against the kind of edge of community developments WBC now propose: *"New estates may be on the edge of town, but historically the road layouts of new developments invariably encourage car use rather than cycling or walking, especially if there are no services or employment to walk or cycle to."* Rather I proposed that (paragraph 25) *"By putting together the value unlocked by thousands of new homes, and planning it as a community with a sense of place, it is possible to deliver the infrastructure, the shops, pubs, cafes, schools, health centres, leisure facilities, multifunctional green spaces, business premises and mixed housing, that makes a community"*.

Figure 2.2: New housing growth for market towns



10. Further, Figure 2.2 on Page 63 of the Taylor Review clearly illustrates these new 'satellite' communities are proposed to be separated by green space from the related existing community which nonetheless provides the higher level services. This is very much the proposed relationship between the DPL scheme and Cranleigh, in contrast to WBC's current proposals for Greenfield releases adjacent to Cranleigh and Farnham. In fact, my text stated: *"(1) Bad Housing growth: Doughnut development of tightly packed housing estates build up against the existing settlement with few additional shops, services or amenity. (2) Good housing growth: Creating self-contained satellite neighbourhoods with mix of housing, employment and public green and open space benefitting both new and old communities."* It was therefore clearly reasonable for DPL to argue the Taylor Review (which the Government had just endorsed) in principle supports the kind of scheme they proposed, and DPL could reasonably add today that the Review was also critical of the type of Greenfield development WBC now appear to propose around Cranleigh and Farnham.
11. The single fundamental issue on which the Inspector and the Secretary of State agreed with WBC's objections to the proposal, and therefore refused the appeal, was the traffic generation from the proposed development, and it was this that led to the dismissal of the appeal.
12. This refusal on transport grounds (the site is described by the Secretary of State as *'not a sustainable location'*) is however subjected to a fundamental caveat:

The Inspector stated (and the Secretary of State agreed): *"Despite its disadvantageous location relative to the surrounding transport infrastructure, the appeal site has many advantages. When seen in the context of other options the appeal proposals may well prove to be the best solution for meeting the SEP housing requirement. However, those other options have yet to be explored. The SEP had not even been approved at the time of the Inquiry and the Council does not as yet have an adopted Core Strategy. The superiority of the appeal proposals cannot be assumed. A decision to allow the Eco-Village to proceed at this stage, prior to the formulation of the LDF, would be premature and would effectively pre-empt the proper consideration of alternatives as part of the development planning process."*
13. In short, the rejection of the appeal did not in either the Inspector's or the Secretary of State's opinions rule out the scheme being supported in future if it proved to be the best option for meeting WBC's housing requirements when compared to the alternatives. This comparative assessment would be appropriately carried out in the process of developing the Local Development Framework, not in determining this application in isolation.
14. Since the appeal several key matters have changed, which in my opinion should have prompted (together with the appeal recommendation above) a ground up re-evaluation by WBC of the suitability of the site for mixed-use re-development, Planning Policy has been substantially reformed. The previous Planning Policy Statements have been replaced by the single National Planning Policy Framework (NPPF), rooted in a presumption in favour of sustainable development and the requirement to meet evidenced housing need. The Government has also announced its intention to abolish regional plans (including the South East Plan (SEP)), although this has been delayed by EU requirements for detailed environmental impact

assessments. WBC's long delayed Core Strategy is now in final draft and is expected to be subject to an Examination in Public (EiP) next year.

15. However, WBC has not been able to agree an alternative long-term strategy for the site with the owners, and WBC's position regarding Dunsfold Aerodrome appeared to DPL to be almost entirely predicated on the South East Plan and the appeal outcome. As the proposals for the new WBC Core Strategy emerged, it became clear to DPL that the Borough Council would continue to oppose any mixed-use (combining business and residential) development at the Aerodrome. In April 2012 I was therefore commissioned by Dunsfold Park Ltd to conduct an independent review to advise them on what options they might now or in the future realistically be able to pursue regarding the future use and development of the Aerodrome site. WBC has also reconstituted (since I was commissioned) a Dunsfold Park Special Interest Group (SIG), with terms of reference "To investigate an appropriate role for Dunsfold Aerodrome in the new development framework for Waverley."
16. Taking the WS Atkins report and the appeal Inspector's report as a starting point, and in the context of the NPPF and the draft Local Plan, I have examined the likelihood of DPL being able to progress a mixed development replacing the Aerodrome (and if so, with what scale and key design elements, and with what mitigations, to address the objective of high quality sustainable development to meet local needs and the requirements of the NPPF); and secondly if this option is ruled out, what alternative development of the Aerodrome would be most viable for DPL or any future owner of the Aerodrome.
17. I also sought to engage with key stakeholders in the community, Councils and interested parties in reaching an understanding of the difficult choices facing the community regarding the future of the Aerodrome site, and what may be the preferences of the local stakeholders. The list of those I met is in Appendix 2 at the back of this report.

Key conclusions summarised

18. Since the appeal, matters have moved considerably both nationally and locally:
 - i The introduction of the NPPF introduced a presumption in favour of sustainable development, a requirement to meet evidenced housing need, a requirement to consider stand-alone 'garden city' type developments as a possible way to meet local housing need, a requirement not to turn down development proposals purely on transportation grounds unless they cause 'severe' impacts, and retained a requirement to prioritise 'brownfield' development over Greenfield development.
 - ii The planning status of Dunsfold Aerodrome is accepted to include permanent permission for aviation uses (the "erection, repair and flight testing of aircraft", unrestricted in terms of flight numbers, times and associated road traffic movements), with the current temporary restrictions on flight times and numbers ending no later than 2018. The site is now agreed to be almost entirely (86%) previously developed ('brownfield') land. WBC was arguing it

was a primarily Greenfield site when the South East Plan (SEP) panel rejected the suggestion of a mixed-use development at the site of 2,500 homes, and it was a matter of contention when WBC rejected the application and opposed it at appeal.

- iii Waverley's draft Core Strategy requires substantial Greenfield releases around Cranleigh and Farnham precisely because WBC still continues to reject the option of housing on the previously developed Dunsfold Aerodrome site. These Greenfield releases relate to WBC concluding it has to find space for around 1,000 homes, more than it can accommodate within the existing settlements. Yet the NPPF says *"Allocations of land for development should prefer land of lesser environmental value"*, and that they should *"encourage the effective use of land by reusing land that has been previously developed ('brownfield' land), provided that it is not of high environmental value"*.
- iv WBC's Core Strategy proposes, even with the Greenfield releases, just 230 homes per annum compared to the SEP requirement of 250 pa and the evidenced need (in the Strategic Housing Market Assessment) of 706 homes per annum. Yet the NPPF requires that Local Plans should, over the whole of the plan period, 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, including identifying key sites which are critical to the delivery of the housing strategy over the plan period"*.
- v The 'urban renaissance' model which the South East Plan adopts, focusing development on larger urban centres with a full range of services, is in a number of respects no longer accepted best practice. In particular, it is now understood that edge of town estate developments are not necessarily well connected to the services in the town and can increase car use and congestion, whilst mixed-use developments, including new communities, may provide a better option. This point featured in the 2008 Taylor Review, and consideration of such alternatives is now required by the NPPF: *"The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development"*.
- vi It is now accepted that in many areas, road congestion is an unavoidable element of economic growth and necessary development, and may need to be managed rather than avoided. Hence the NPPF states *"Development should only be prevented or refused on transport grounds where the impacts of development are severe"*.
- vii More recently, WBC argue in their draft Core Strategy that Whitehill/Bordon eco-town and the Aldershot Urban Extension both may absorb part of Waverley's unmet housing need. However, the Duty to Cooperate documentation shows both those Councils rejecting this proposition. It is also not clear from the documents that the Duty to Cooperate has led to any

meaningful dialogue to resolve issues, which is what the NPPF actually requires. Meanwhile, the successful legal challenge to the SEP to release land for 2,000 homes north east of Guildford has left a substantial 'black hole' regarding the SEP housing provision on the border of Waverley, exacerbated by plans for the Slyfield Urban Extension being put on hold.

19. On all these grounds, DPL should seek to present the options outlined in this report (below) for the future of Dunsfold Aerodrome, including the case for a mixed-use development scheme of some sort for the Aerodrome site, to the newly established WBC Dunsfold Aerodrome SIG. With its broad terms of reference and the recently improved relationship between DPL and WBC there is, hopefully, an opportunity for a genuine engagement in a fundamental re-appraisal of the future of the site. Similarly, if WBC continues with its present strategy, there is a strong case for DPL to challenge the draft Core Strategy at the EiP.
20. One option for such a scheme is a proposal for a mixed-use scheme based on that submitted in 2008, but updated to address the garden city design principles required by the NPPF, and the possibility of better relieving traffic impacts on the A281 – perhaps through a park and ride bus scheme catering to Cranleigh and Horsham-Guildford traffic as well as the new development. This would potentially relieve congestion at Bramley in particular, and without it even if a Dunsfold Aerodrome mixed development does not occur, other developments are likely to drive increasing congestion there.
21. The second option is a new smaller mixed development 'garden village' scheme (1,000-1,250 homes). This would certainly have less impact on the A281, and remove the need for Greenfield development to meet WBC's proposed housing target. The viability of delivering the full transport mitigation and other sustainability benefits of the larger scheme would need to be tested.

Option One: An updated proposal based on the 2008 application

22. A scheme on broadly the original scale, but updated regarding transport mitigation to ensure the transport impacts are not severe (subject to comparative impact assessment of WBC's alternative proposals), and to conform to the Government's preferred 'garden city' principles, has clear potential benefits:
 - i. Aviation and automotive uses would cease, solving the noise and disturbance issues permanently.
 - ii Site access onto the A281 could be improved, removing the current impacts of traffic movements on/off site on the surrounding residential properties.
 - iii This scale of development would still impact on the A281 but, as the appeal Inspector concluded, alternative development elsewhere in WBC will also have transport congestion impacts and less capacity to support innovative mitigation.

- iv Rising traffic levels on the A281 and resulting congestion, notably at Bramley, could be further mitigated by adding a high quality park & ride facility on land owned by DPL, facilitated by the frequent public transport financially underpinned by the previous proposals.
- v No need for substantive release of Greenfield sites in Waverley (and potentially the Green Belt around Guildford).
- vi WBC gains a strong role in the master-planning, design, and mitigation, in contrast to its weak position in relation to controlling aviation related growth after 2018.
- vii WBC (and potentially Guildford) address their evidenced housing need more effectively, strengthening their hand in fending off unwanted speculative development proposals elsewhere in the community.
- viii A national exemplar eco-community is created, including opportunities to create and grow a centre of excellence for environmental businesses.
- ix Housing onsite for employees creating genuine live-work opportunities, with affordable homes prioritised for those living and working on the site and the immediate surrounding communities.

Option Two: Develop a smaller 'garden village' scheme of 1,000-1,250 homes

- 23. Given the fact that WBC has recently revised its draft Core Strategy to accommodate a larger number of homes to bring it (nearly) in line with the SEP, it has identified a shortfall of around 1,000 homes over the plan period. To address this, WBC is currently proposing to release Greenfield sites.
- 24. These Greenfield release proposals contradict the NPPF (which prioritises 'brownfield' releases), and have sparked considerable local opposition, especially in Farnham, even before specific sites have been identified. The failure to identify specific sites and the stalled nature of some of the existing proposed development sites (including the significant East Street site), also raises a question mark over the deliverability of the WBC proposals.
- 25. In this context the possibility of a smaller mixed development 'garden village' scheme (1,000-1,250 homes) has considerable attraction.
 - i Aviation and automotive uses would cease, solving the noise and disturbance issues permanently.
 - ii Site access onto the A281 could be improved, removing the current impacts of traffic movements on/off site on the surrounding residential properties.

- iii This scale of development would impact much less on the A281 and, as the appeal Inspector concluded, alternative development elsewhere in WBC will also have transport congestion impacts and less capacity to support innovative mitigation, including the proposed developments at Cranleigh.
 - iv Rising traffic levels on the A281 and resulting congestion, notably at Bramley could be further mitigated by adding a high quality park & ride facility on land owned by DPL, facilitated by the frequent public transport financially underpinned by the previous proposals.
 - v No need for substantive release of Greenfield sites in Waverley (and potentially the Green Belt around Guildford).
 - vi WBC gains a strong role in the master-planning, design, and mitigation, in contrast to its weak position in relation to controlling aviation related growth after 2018.
 - vii WBC (and potentially Guildford) address housing need more effectively, strengthening their hand in fending off unwanted speculative development proposals elsewhere in the community.
 - viii A national exemplar eco-community is created, including opportunities to create and grow a centre of excellence for environmental businesses.
 - ix Housing onsite for employees creating genuine live-work opportunities, with affordable homes prioritised for those living and working on the site and the immediately surrounding communities.
26. My recommendation is that both these options are discussed with the WBC SIG in order to promote an alternative approach to the spatial strategy currently proposed by WBC. Viability of the smaller scheme in particular would need to be tested in detail in relation to funding the transport and services suggested.
27. In the absence of agreement with WBC, the analysis and options could be presented to the Inspector at the EiP into the draft WBC Core Strategy. Depending on the outcome regarding the Core Strategy, there may also be an opportunity to submit an application for either of the approaches above on the basis of the presumption in favour of sustainable development. Any housing numbers set for Waverley are likely to be a minimum given the substantial levels of unmet housing need both in the Borough and the immediately surrounding communities – notably Guildford.

If mixed-use development is ruled out, grow the existing business

28. If the opportunities for DPL to pursue a mixed-use development at Dunsfold Aerodrome are exhausted or appear to have no achievable outcomes, DPL (or its successor) will need to realise the site's alternative economic and business potential. The WS Atkins report (which uniquely examines all the options for Dunsfold Aerodrome), concludes that aviation is the site's most valuable unique selling point. Despite policy CS10 suggesting otherwise, it is (as URS suggest in WBC's sustainability

appraisal) unlikely that WBC has the powers it describes to exercise significant control over aviation related development. Moreover, the NPPF states, **“When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation”**. Taken together, all these factors mean it is very difficult to see how WBC could resist the growth of aviation at the Aerodrome unless it is closed to allow a mixed-use redevelopment. And DPL show convincing evidence of the potential aviation demand.

29. Therefore, the best option for DPL as a business if mixed-use is ruled out (which is what WBC’s draft Core Strategy proposes) is to grow the aviation business alongside upgrading the other business offers. What that means however is:
- i No improvement, and very likely a worsening of, the ‘nuisance’ issues to local communities of the Aerodrome uses (air traffic and automotive). WBC’s own environmental appraisal doubts WBC can control this.
 - ii Substantial Greenfield development in Waverley Borough (notably at Cranleigh and Farnham), that could instead be better accommodated on this ‘brownfield’ site.
 - iii Cranleigh faces the worst of both worlds – increased aviation impacts **and** Greenfield development - sufficient to increase congestion on the narrow link roads from Cranleigh to the A281, particularly on those alternative routes such as Shamley Green, Wonerish, Shalford etc.
 - iv Even if WBC’s housing numbers are agreed at 230 or 250 pa, this will likely be expressed as a minimum. Moreover some of the schemes WBC is relying on have long been stalled and are therefore of questionable viability (notably the Farnham East Street scheme). Without the clearly deliverable housing Dunsfold Aerodrome could offer, it will be much harder for WBC to defend against ad hoc speculative housing development applications across Waverley.
 - v Dunsfold Aerodrome itself could still win a revised application at appeal if the Waverley housing figure is expressed as a minimum, proposed as a sustainable development addressing WBC’s evidenced unmet housing need. This is all especially true if other schemes on which WBC rely, such as East Street, remain stalled.
 - vi Should the Inspector require WBC to increase the housing numbers above 250 in light of the evidenced need (or, as has happened elsewhere, require the figures to be updated in a short period) then the Borough Council may need to consider very much larger Greenfield releases unless Dunsfold Aerodrome is ruled back in.

30. I believe there is considerable local support for re-examining WBC's policy stance in relation to the future of Dunsfold Aerodrome, and the comparative impacts of WBC's wider housing and spatial plan. In any event, I conclude a much more thorough and up-to-date review of the options for the future of the site is necessary.
31. In particular, before adopting policy CS10, WBC should be pressed to obtain a detailed reappraisal of the relative merits of a mixed-use development at Dunsfold Aerodrome compared to the WBC proposed Greenfield releases, that does not simply presume (as the draft Core Strategy and the URS appraisal both do) that Greenfield releases on the edge of Cranleigh and Farnham are more sustainable than a development at Dunsfold Aerodrome. This should be combined with an updated review of all the possible options for the Aerodrome similar to the WS Atkins report. The Alan Stratford and Associates Report (April 2011) regarding aviation is contested by DPL on a range of detailed points, including that it misinterpreted the CAA status of the Aerodrome and its route constraints. It would be sensible to resolve this by WBC and DPL jointly commissioning an appraisal of the commercial opportunities and constraints.
32. At the least, before WBC adopt policy CS10 it should be candid with the public regarding its ability to control aviation related development and the associated noise and nuisance, given that its own environmental appraisal casts doubt on its ability to achieve these elements of draft policy CS10.
33. As things stand, on the evidence presented, I conclude that permanently closing off the option of a mixed-use development leaves the most viable option for DPL (or an alternative future owner) the active pursuit of aviation growth. DPL is armed with a permanent unrestricted (re times and numbers) aviation planning permission and various permitted development rights. As the sustainability report suggests, I believe WBC will have very few powers, in practice, to curtail aviation related development here. I also conclude that such aviation development would clearly not be the best solution for the surrounding communities, but will likely be the best commercial option for DPL or any future owner of the site.
34. The views in this report are mine alone (and from the start I made it clear to those I met I would not be directly quoting our discussions, so that they could speak as freely as possible). I am very grateful indeed that the overwhelming majority of those I approached were willing to spend time with me discussing openly their thoughts and concerns about the future of the Aerodrome, the site, and the impacts and issues facing the surrounding communities. This has allowed me to be as informed as possible of the cross section of opinions locally, about the options that might be considered to meet local concerns regarding both the existing uses and any development proposed.
35. The review has been conducted at the request of Dunsfold Park Ltd, to inform their decisions on what avenues to pursue. Given the decision by WBC to establish a new SIG to consider the future role of the site, I hope my report may also help inform their deliberations.

Conclusion

36. Waverley Borough Council's current draft Core Strategy proposals involve a lose-lose scenario: Greenfield developments around Farnham and Cranleigh, plus likely growth of aviation use of the Aerodrome which the Council would have little or no power to control. A well-planned garden village would, in contrast, provide a win-win-win for the community: a permanent end to the aviation and automotive noise and nuisance issues; an exemplar garden-village mixed use development which actually enhances the landscape, public realm and biodiversity rather than edge of town Greenfield developments; and a clearly deliverable (and therefore defensible) housing strategy meeting pressing and evidenced housing needs in Waverley. As the Inspector for the 2008 appeal suggested it might, I believe that a proper assessment of the net sustainability of this development compared to the draft Waverley Core Strategy could prove to be the best and most sustainable solution for meeting the housing requirement, the requirements of the NPPF, and most importantly to deliver the homes, jobs and facilities so many local people desperately need.



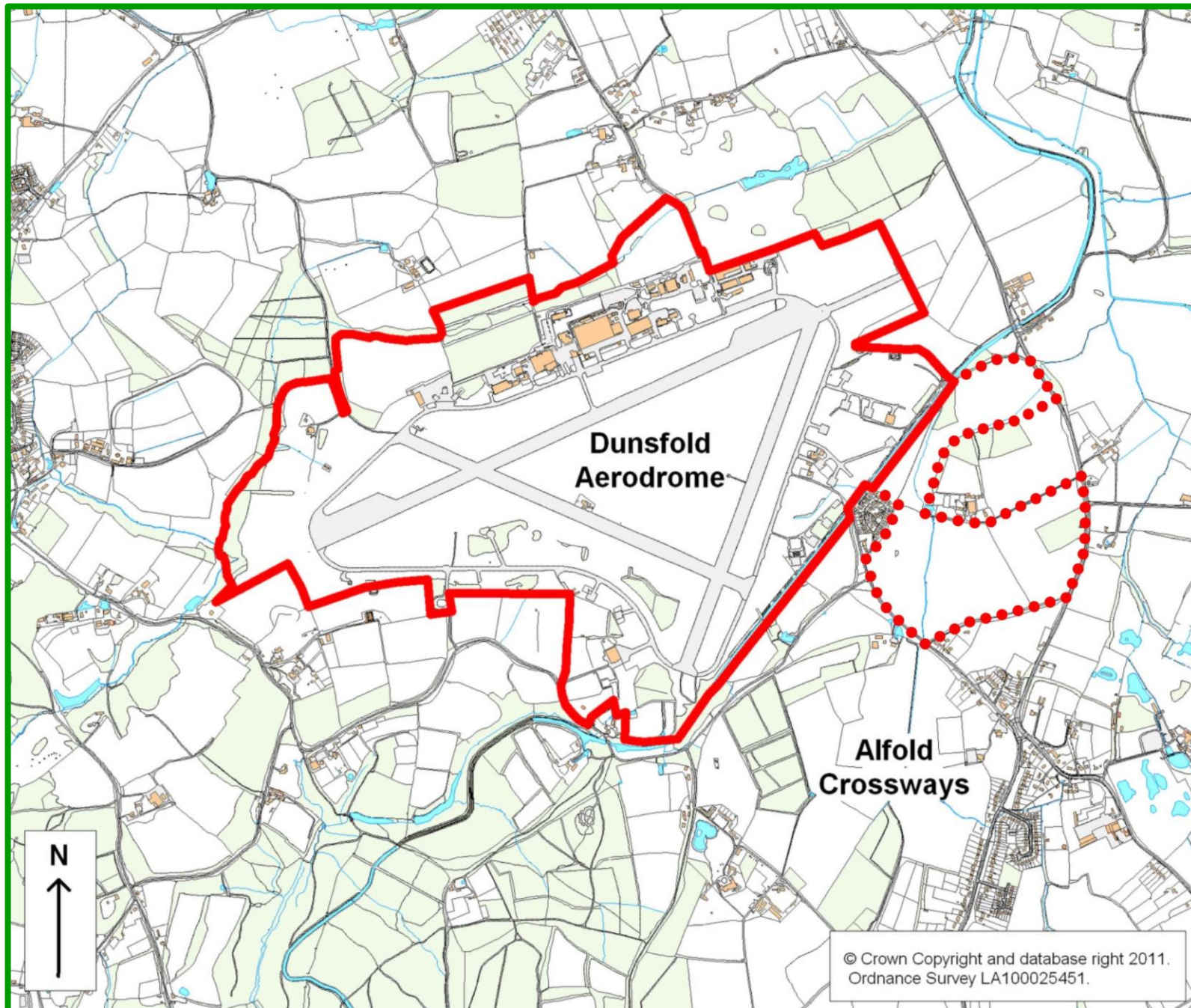
Matthew Taylor

September 2012

About Lord Taylor

37. Lord Taylor conducted a Government Review, commissioned by the last PM, into how to reform the planning system to better address the challenges of rural housing and sustainable rural economic development (*The Taylor Review, 2008*). That review was accepted by Government (47 of 48 recommendations) and widely supported (CPRE, Country Landowners, ACRE, Local Government Association, Royal Institute of Chartered Surveyors, NFU, National Association of Local Councils, planning bodies like TCPA and RTPI, etc. – as well as by all three main political parties).
38. The Taylor Review informed the development of both Conservative and Liberal Democrat planning policy before the last General Election, and thence the NPPF, which is now in place and will determine the Waverley Core Strategy.
39. The wide support for the Taylor Review led to the above organisations forming a 'Rural Coalition' comprising national organisations concerned with rural sustainable development and planning, for which he was asked to be the founding Chairman. It is now a key 'sounding board' for policy development at the Government departments most concerned about rural development – principally DEFRA, but also CLG. After the last General Election the Rural Coalition published a joint document '*The Rural Challenge*' (2010) that has informed the Government's recently published Rural Policy paper.
40. Today Lord Taylor chairs the National Housing Federation (the Housing Association national body) which amongst other things has been running for two years a rural housing initiative.
41. Lord Taylor also chairs the Partnership Board delivering the St Austell Eco-Communities (one of the three eco-towns that originally went forward, though as it is split across three sites the main development is similar in size and concept to that previously proposed at Dunsfold Aerodrome). It also has a similar locational relationship to the market town of St.Austell, as Dunsfold Aerodrome has to Cranleigh. The partnership takes pride in a wide community involvement and support. Lord Taylor was previously a rural (Cornish) MP for that community for 23 years, prior to standing down in 2010 and subsequently entering the House of Lords.
42. He continues to advise government and others on national planning and housing policy.





PART 1

ANALYSIS OF THE PLANNING POSITION TO DATE

Dunsfold Aerodrome History

43. A large site of 248 hectares, Dunsfold Aerodrome comprises three runways, extensive hard standing and aircraft dispersal areas, perimeter tracks and approximately 45,000sqm of industrial buildings housing a variety of businesses.
44. Built in 1942, Dunsfold Aerodrome was constructed for the Royal Canadian Air Force in the Second World War. It has been in continuous aviation use ever since. From 1946 to 1951 it was occupied by Skyways, an air-charter company. It was then taken over by Hawker Aircraft, later British Aerospace (BAe), for the development, flight testing, manufacture and repair of aircraft (latterly for development, manufacture and repair of both the Hawk and the Harrier).
45. It was granted permanent planning permission on 13 April 1951 for the “erection, repair and flight testing of aircraft”. There is no longer any requirement, should that use cease, to remove the buildings and return the site to agricultural use, nor is the aviation use restricted to a particular user.
46. BAe announced in 1999 that it no longer needed the facility (at its peak, BAe employed 1,400 people at Dunsfold Aerodrome), and following their withdrawal in 2000 with the loss of highly skilled jobs, the Aerodrome was purchased by The Rutland Group in 2002, who formed the airfield operating company Dunsfold Park Ltd (DPL).
47. For many years, all concerned believed the 1951 planning permission to have been temporary. However, all are now agreed that it was and is a permanent permission, since it contains no condition or other restrictions limiting its duration, aircraft movements, or on vehicle movements associated with the aviation use etc. Because of the mistaken earlier belief however, a number of later ‘continuing use’ permissions were sought and obtained, which - unlike the underlying permanent permission - do place limits on air movements. As a result, the permissions contain a number of restrictions: only aircraft with an unladen weight of 70 metric tonnes or less may use the Aerodrome, and aircraft movements are limited to 5,000 in any one calendar year (of which no more than 2,500 are to be associated with aircraft repair, assembly and flight testing; and 2,500 with the movement of staff and customers of occupiers of the site). There are also restrictions on the times of aircraft movements and the duration of running of engines on the ground. There are no restrictions on aircraft noise levels.
48. The most recent temporary permissions, granted in 2008, included 24 conditions, one of them setting an ‘expiry date’ of 30 April 2018. From that date the position reverts to that of the unrestricted April 1951 permission for “Erection, repair and flight testing of aircraft at Dunsfold Aerodrome”. The only condition imposed then was: “No variations from the deposited plans and particulars will be permitted unless previously authorised by the Hambledon Rural District Council.” The only plan submitted in 1951 was a site plan drawn around the wider Aerodrome boundaries.

49. DPL is currently pursuing a High Court case arguing that the 1951 unrestricted permanent permission cannot be limited (as a matter of law) by the more recent temporary permissions, but that is disputed by Waverley Borough Council (WBC); the case will be heard next year. To be clear, the issue at question is whether the unrestricted aircraft movements permitted in 1951 applies now, or not until 2018 when the current limitations cease in any event. There is no longer any dispute regarding the fact that the 1951 permission will apply by 2018 at the latest.
50. Although previously disputed, as the WBC Core Strategy Draft states, the Council now accepts “86% of the site is Previously Developed Land” (ie ‘brownfield’). Previously, at the time of the development of the South East Plan (SEP), the site was considered largely ‘Greenfield’ undeveloped land, a view WBC also argued at the appeal into the eco-village application. The now acknowledged previously developed status of almost the whole site materially changes the context regarding potential development of the site.
51. There are General Permitted Development Orders (GPDO) permitted development rights for buildings to be erected (eg hangars, manufacturing facilities, associated offices etc). WBC accepts that there are particular CAA permitted development rights for aviation related activities. Though WBC and the owners differ on how broadly these rights may be drawn, substantial buildings for aviation uses (hangars, aircraft related manufacturing and repair facilities, and associated offices) could be erected at broadly the owner’s discretion.
52. Thus, both operationally and in terms of development of associated facilities, in practice WBC has very limited powers as a planning authority to plan, control or direct certain aviation related activity on the site. WBC does not acknowledge this limited authority in its proposed draft Core Strategy policy CS10 for Dunsfold Aerodrome, but the environmental appraisal commissioned from URS by WBC highlights the fact that it may not be able to apply the constraints the policy proposes on noise, disturbance, and aviation movements. In short, by 2018 WBC cannot control aviation usage falling within the 1951 consent or most aviation related built development, though it can influence substantively different uses from that originally permitted (eg commercial passenger aviation).
53. Dunsfold Aerodrome is situated in open countryside characterised by woodland and agricultural land and is within an area that the Waverley Local Plan designates as “Countryside beyond the Green Belt”. Two small parts of the site are within an Area of Great Landscape Value and there are two small Sites of Nature Conservation Interest – as designated by the Local Plan – in the northern part of the site. The boundary of the Surrey Hills AONB lies less than a mile to the north. The site is bounded to the South East by the Wey and Arun Canal.
54. Planning permission exists for the change of use of some of the existing buildings from aviation related uses (essentially the main complex of buildings on the northern edge) and temporary planning permission granted for various other uses. These temporary permissions are subject to restrictions on vehicle movements, but again the restrictions do not apply to the underlying 1951 permission. The site now houses some 100 tenants and licensees, employing more than 700 people, across a broad range of industrial, commercial, distribution and storage uses. There is also filming

and police driver training, various ‘track’ events for automotive activities such as the BBC’s Top Gear programme, and McLaren regularly use it for vehicle testing and driver training. All these are in addition to the aviation uses, and a number of them (principally those related to track activities and vehicle testing) are associated with a history of noise related complaints from the immediate neighbours.

55. Currently there are two principal entrances to the site, one at the southern end of Stovolds Hill, providing access to the B2130 and the A281 north, while the other is at Compasses Bridge, giving access to the A281 south at Alfold Crossways. However, DPL’s own land would allow a direct access onto the A281 if the site is developed. There are scattered residential properties and two large gypsy sites to the north of the site and a mobile home park to the south. The resulting traffic movements on the access roads give rise to complaints from the residents there. There is also an on-going history of concern across a wider area (notably within Cranleigh and the smaller surrounding villages) about the noise of air movements associated with the site, and a still greater level of concern that this may increase in future if the Aerodrome activities are expanded. A ‘Dunsfold Airport Action Group’ has formed to press against increased airfield activities.

KEY POINTS 1

- A large site of 248 hectares - 86% of the site is Previously Developed Land (ie ‘Brownfield’).
- The underlying permission allows unrestricted flight and aviation related traffic movements.
- Permanent planning permission exists for the “erection, repair and flight testing of aircraft”.
- GPDO permitted development rights exist for aviation related activities.
- Noise issues related to aviation and automotive related uses, and traffic on access roads.
- Site now has more than 100 occupiers employing over 700 people.

WS Atkins Impact Study of the Closure of BAe Dunsfold (Jan 2000)

56. When BAe announced their intention to vacate Dunsfold Aerodrome, this threatened substantial local employment impacts and raised the question of future use of the site.
57. WS Atkins was commissioned jointly by BAe, WBC, Surrey County Council and Surrey Economic Partnership to assess the options and opportunities for the Aerodrome site. The planning permissions regarding the use of the airfield (which were then believed to be temporary, requiring a return to agricultural use when the BAe activities cease), did not constrain the terms of their review. The remit was to develop a plan to minimise the impact on the local community and the economy of the BAe closure. The review considered all possible options for the future of the site, and the detailed analysis provides a benchmark in understanding its potential.

58. WS Atkins urged the early adoption of a “clearly defined strategy for the future of the site, because a “do nothing” or “wait and see” approach to its future could well have undesirable consequences that would be difficult to unravel in the longer term.”
59. WS Atkins summarise the options as follows:

Employment Re-Use And Development Options

i ***Replacement of Aerospace and Aviation Related activities.***

They cited evidence of demand from foreign owned companies for large scale activities such as simulated flight training, manufacturing of flight simulation equipment, and aircraft maintenance operations. Additionally, recent nearby developments (Farnborough and Fairoaks) suggested a cluster of smaller operations, including manufacturing of aircraft components, a range of aircraft servicing operations, air taxis and other small scale private aviation activities could be attracted around core activities of this kind.

ii ***R&D and High tech Manufacturing Activities.***

Whilst West Surrey is attractive to knowledge based activities, most such businesses would seek to retain their ties with the university at Surrey Research Park. Dunsfold Aerodrome would only be attractive to those requiring a secluded and controlled operating environment.

iii ***Headquarters and Customer Support Office Activities.***

Dunsfold Aerodrome would not prove attractive to major office users (other than those above). Speculative development of a campus style office park was “dubious” due to lack of a suitable labour catchment, limited choice of public transport and unacceptable distance from major roads and motorways. Without proven demand, funding would be problematic. There might be interest in a highly specialised international call centre due to the land area available.

iv ***General Manufacturing and Industrial Services.***

Despite an identified shortage of industrial buildings in West Surrey, they concluded Dunsfold Aerodrome lies too far from major roads and major markets, and there would be a shortage of available workers and no adjacent facilities for staff.

v ***Leisure and Recreational activities.***

Leisure and tourism uses would be unlikely to be viable except within a self-sustaining mixture of other mainstream development activity on the site. A hotel/conferencing facility might work as part of a mixed-use development.

vi ***Institutional activities.***

Health/social care would be suited to the attractive, secluded environment away from urban areas. A University Campus was unlikely away from a town centre. Other institutional uses that require a remote location with security, such as prisons, or highly sensitive research activities, might also be attracted – but probably locally unacceptable.

- vii **Development of Start-up and Expansion Business Units.**
Such a development might be attracted but would be “highly dubious” as a stand-alone use, being better suited as a component of a larger (eg mixed-use) development.
- viii **Agriculture.**
Viable agricultural use as a single use option was unlikely, though might well be viable on a smaller scale as part of a mixture of activity.

Feasibility of Housing Development

- 60. Unsurprisingly, WS Atkins saw housing development as commercially attractive given Dunsfold Aerodrome lies in one of the most sought after areas of the country.
- 61. In policy terms, they comment that housing provision would ease labour market pressures, particularly if this were to include an element of social housing, and might cross-subsidise desirable activities such as sports and recreation which might not succeed commercially on a stand alone basis on the site. The site might also offer an alternative to developing Greenfield sites elsewhere in the area (as is now proposed in the Waverley draft Local Plan). The support and infrastructure requirements would, however, have to be taken into account, as would the then County Structure Plan preferring housing development in urban areas.
- 62. WS Atkins emphasised that
 - i *“It would not be acceptable for the entire site to be developed for housing, because, in isolation, this would create excessive demands on the surrounding environment and would not be a sustainable form of development. However, if housing were to be considered as a realistic re-use of part of the site, it is conceivable that this could be justified as part of a mixed-use development, oriented to establishing a combination of activities that would make such a development self sufficient and reducing the need to travel, mitigating adverse environmental impacts which might otherwise ensue. This would require a sustainable critical mass of activity which provides a workable stand alone economy and social structure which is inter-dependent, achieved by creating a community with a compatible balance of employment development (eg small business units or a tele-cottaging support), an appropriate mix of housing, including affordable homes, copious areas of open space, a range of recreation activities and necessary community support facilities. For this to be achieved a development of 1,000 or more housing units would be needed to create a sustainable demand for the range of support and infrastructure needed to make a new settlement sustainable.*
 - ii ***“The benefits of creating a sustainable planned community, promoted as a best practice model, exemplary in national and international terms, might well justify a planning decision in favour of residential development in a mixed-use setting”.***

- iii *“The question would be how to achieve control over the style of development. This could however, be addressed by securing the land through public funds or promoting a development in partnership with the current owner, then mounting a competition to select a suitably imaginative development consortium, and tying in minimum standards for the content, mix and style of the scheme by way of a development agreement.”*

WS Atkins impact appraisal of these options

63. The economic, environmental and social impacts of these options were:

- i Aerospace and aviation-related uses were likely to be both desirable and acceptable where these did not involve excessive traffic or aircraft movements creating incremental noise levels (ie mirroring the then still current BAe operations).
- ii Low density development of high quality knowledge based industrial uses, involving low volume but high value products would be unlikely to create adverse environmental impacts, and provide the basis for a stronger and sustainable sub-regional economy. This was more likely to succeed by way of a small number of owner-occupier establishments rather than speculative development.
- iii Major office or industrial development was considered unlikely from a commercial point of view and would be likely to create a number of undesirable environmental impacts, as well as causing overheating of the local labour market.
- iv The development of small business accommodation would be desirable from an economic point of view and would have minimal environmental impact. It would only be feasible as part of a larger scale mix of uses.
- v Reversion to agricultural use would have low impact from an economic or environmental point of view. It would permanently remove an area of employment land.
- vi The development of leisure, recreation and tourism activity would be beneficial but the commercial viability without cross-subsidisation from other more financially attractive forms of development would be questionable.
- vii Housing development as a single use on the site would permanently remove employment development potential and at a given scale would lead to increased traffic levels.
- viii Certain institutional uses, in particular health care, could meet a ready demand and create limited numbers of jobs without excessive environmental impact. Other institutional uses could have adverse social impacts or create concerns about personal well being and the image of the area, which could affect residential property values.

- ix **A mixed-use development comprised of a balance of housing, employment, recreational and community support infrastructure, would be viable in commercial terms, preserve employment opportunities but at a more acceptable scale, help provide more of a balanced community through the provision of affordable housing and enable a desirable range of local amenities to be cross-funded through development.**

WS Atkins conclusions re feasible re-use and redevelopment options

64. The following conclusions were drawn.

- i *“Feasible options, from both a commercial, economic and environmental point of view would centre around the following options.*
- *Aerospace and aviation-related activities, with no or limited incremental impact on noise.*
 - *High quality employment activities oriented to growth and technology, developed at low density.*
 - *An imaginative and balanced mix of residential, employment and recreational activities and community support, at sufficient critical mass to become self-sufficient in sustainability terms.”*

65. Commenting on these options, they added:

- i *“Of these, in the period up to the closure of the site, the first option should be considered the priority, and to a more limited degree the second, given the overall aim of maintaining the status quo.*
- ii *“Beyond this, if the third option is chosen, it would be essential for clear guidelines to be established in order to achieve the exemplary, sustainable, balanced and high quality mix of activity that would be necessary to justify a mixed-use development on the site.*
- iii *“The choice of leaving the site vacant for a protracted period of time, with a vague policy for re-use and re-development, in order to leave options open, is not considered a prudent one, in view of the adverse activities which may well find a home on the site, albeit temporarily. A permanent solution to the redevelopment and re-use question will be necessary.*
- iv *“Furthermore if these options are to be realised, it will be necessary to test them in sequence in the market, appraise their suitability, and where potentially acceptable, to define the planning policy and framework which would make them workable. For this to be realistically achieved, a development strategy for the site, setting out the acceptable development options, together with a supporting infrastructure plan, would need to be defined.”*

66. The commentary makes clear maintaining continued aviation related employment or similar technology related employment was preferred because of *“the overall aim of maintaining the status quo”*. Presumably (though not explicit) this was because it was carried out prior to BAe closing their facility, so the employment impact on the highly skilled staff was uppermost - the remit being to develop a plan to minimise the impact on the local community and the economy. That said, the final recommendation is to test all three options in the market.
67. Whilst WBC’s latest draft Core Strategy *“supports the continuation and expansion of employment activity at Dunsfold Park”*, the owners continue to advocate a mixed-use redevelopment and therefore continue to offer only short term leases to aviation related businesses, albeit successfully attracting a large range of employers.
68. The risks W S Atkins highlight of not having a *“clearly defined strategy for the future of the site”* have in part been mitigated by the site’s single ownership by Dunsfold Park Ltd (so the site remains a single entity, and positively managed), and the lost employment has been replaced by the tenancy of more than 100 occupiers (over 700 staff). However, the short term leases offered whilst DPL seek long term permissions for a mixed-use scheme mean that the quality and long term nature of this business use has been limited, and no long term investment possible in the aviation potential. The result is that the Aerodrome’s commercial potential is by no means being realised. However, a number of uses are impacting on surrounding residents (eg automotive uses, air movements) which might have been resolved by longer term agreement on the use of the site. Were a mixed-use development agreed that required the closure of the Aerodrome, the noise and disturbance issues would be permanently resolved.

KEY POINTS 2

“Feasible options, from both a commercial, economic and environmental point of view would centre around the following options.

- *Aerospace and aviation-related activities, with no or limited incremental impact on noise.*
- *High quality employment activities oriented to growth and technology, developed at low density.*
- *An imaginative and balanced mix of residential, employment and recreational activities and community support, at sufficient critical mass to become self-sufficient in sustainability terms.”*

The South East Plan

69. The possibility of a mixed-use development of around 2,500 homes and 2,000 jobs was presented by Dunsfold Park Ltd to the Examination in Public (EiP) into the South East Plan, as part of making a wider case for the South East Plan to consider incorporating new communities of this sort as a possible solution to the housing needs and development pressures. Whilst no detailed account of their assessment is published, the Inspector came down against recommending it:
- i ***“Dunsfold Park - 26.86 The case for strategic-scale development at Dunsfold Park was made at EiP. This was broadly described as a proposal for a sustainable development of a cluster of rural settlements, including large-scale mixed-use development on the Dunsfold Aerodrome site and new transport links to Cranleigh. Live-work units, a substantial element of affordable housing provision for local people and accommodation for over-50s are amongst the components that would, it was argued, provide a sustainable solution to housing requirements in this part of the region and make best use of a major brownfield site. We share the view of a number of participants that elements of the proposal are innovative and worthy of application more generally. Nonetheless, in our view the proposal for about 2,500 dwellings and 2,000 jobs at Dunsfold Park would seriously unbalance the regional strategy and it would be likely to remain unsustainable. The area is relatively remote from service centres, public transport accessibility and the local road network would not be capable of being improved to an appropriate level, and it would be difficult to secure the level of self-containment that might overcome these disadvantages. Accordingly, we would not recommend the scale of development proposed at this location.”***
70. It is important to note that when this assessment was made, the Dunsfold Aerodrome site was considered by WBC almost entirely Greenfield, and the long term aviation planning status based on the 1951 permission was not established either. Nor had the application and appeal taken place, in which the Inspector concluded that the proposal when assessed against other options for delivering Waverley’s SEP housing requirement might well prove the best option. Nor of course was the NPPF in place, with its requirement to consider larger scale integrated developments on garden city principles as a possible way to meet housing needs and the need for sustainable development.

KEY POINTS 3

- The RSS EiP panel did look at an outline suggestion for development at Dunsfold Park of 2,500 dwellings, and rejected it.
- However, at that time the site was considered largely Greenfield, and without a permanent aviation permission. It also reflected a regional strategy that the Government plans to abolish, and which at the local level hinged on a growth strategy for Guildford which was successfully appealed against. Its conclusions cannot therefore be assumed to apply in the present circumstances, especially given the subsequent advice (see next section) of the appeal Inspector (and the Secretary of State) that ‘When seen in the context of other options the (DPLs) appeal proposals may well prove to be the best solution for meeting the SEP housing requirement’.

Dunsfold Park's application for a mixed-use development and closure of the airfield (2008)

71. Dunsfold Park Ltd made a formal planning application for a mixed-use development "creating a balanced and integrated community" in early 2008, which was refused, and then taken unsuccessfully to appeal.
72. The essence of the proposals was described as being *"to create a balanced community, building on the employment potential of the inherited land, buildings and infrastructure. Jobs, expected to number some 2,000 on completion of the development, will be matched by 2,601 homes, of which 910 will be affordable. A village centre, containing local shops, primary school, a special needs school, primary health care, an ecumenical church, a multi-purpose community centre, health club, hotel and aviation museum, will be located at the heart of the community, readily accessible on foot to residents and employees."*
73. The industrial space was to be progressively upgraded, expanded and diversified over the 10 year development period to provide for the expansion of existing firms, for the development of business in environmental and other emerging technologies, for the relocation of local firms and to encourage business synergies on the site.
74. Access within the village was designed to favour walking, the inner core of the village providing only limited access for vehicles.
75. The supply of energy and heat from an on-site combined heat and power plant would have been fuelled from a renewable source: local woodland produce. This, plus water saving measures and the capture of rainwater for non-potable uses, would have enabled the village to achieve Level 6 of the Code for Sustainable Homes in relation to energy and water. The village would be served by Sustainable Urban Drainage. 80% of the output of the on-site treatment of domestic waste was to be recovered including recycling.
76. About 42% of the site would be developed, the rest of the site - approximately 58% - being largely devoted to a new country park open to the public, extensive areas for nature conservation, landscaped screening and recreational areas.
77. In addition to mixed-use and other measures to reduce the need to travel, the proposals included an ambitious Transport Strategy, including a cordon charge on vehicles leaving the village and personal and public transport fuelled by electricity or bio-fuels.
78. Given the subsequent issues around transport, it is worth elaborating on the transport proposals designed to manage demand for travel and promote alternatives to the car. The nature of the mixed-use scheme was to minimise the need to travel by car for services (with local shop, pub, primary school etc) or jobs. Priority in the allocation of housing would go to those working on the site and in the local area and home-working would be encouraged. The Master Plan was designed to maximise accessibility on foot within the village through a compact layout (all homes and workplaces within 650m of the village centre) and a safe and attractive environment

for pedestrians, with limited access for vehicles in the inner residential area and the village centre.

79. The Transport Strategy then addressed the remaining demand for travel by a twin approach of deterrents to the use of cars and the promotion of environmentally friendly alternatives. First a cordon charge levied on vehicles leaving the village. Second, a workplace parking levy.
80. The net proceeds of both charges would be available to support alternative forms of transport, together with the benefit of some of the commercial property on site. The long term funding of the transport mitigation measures was in this way permanently secured. New frequent bus services would connect Dunsfold Park to the main centres for shopping, employment, leisure, and transport connections: Cranleigh, Guildford, Horsham and Godalming. Scheduled services would be complemented by demand responsive services for destinations or times with lower flows. The buses would also link the main parts of Dunsfold Park itself, facilitating internal movement (no home more than 300m from a stop). The buses were to be electric, or bio-fuel powered. For the residual number of trips that require individual transport residents were to be encouraged to use car clubs or purchase electric vehicles.
81. Pedestrian and cycle routes within the village would also connect to external routes to Cranleigh and nearby villages, facilitating walking and cycling. Improved bus services and the additional range of jobs at Dunsfold Park would also reduce the need to travel overall and by car for residents of the wider 'Cranfold' area. The transport measures were expected to reduce car trips by 39% overall for Dunsfold Park residents (72% for trips to Cranleigh) and to reduce car trips by employees travelling to Dunsfold Park by 20% overall (48% of trips originating in Cranleigh).
82. The exemplary quality of the proposed scheme won the support of Friends of the Earth nationally – to this day the only development scheme they have ever supported. The Master Plan also won the prestigious Francis Tibbalds Award for the best potential new development in the UK.

KEY POINTS 4

- 2,000 jobs matched by 2,601 homes, of which 910 affordable
- A village centre - local shops, primary school, primary health care, community centre
- Transport Strategy, including a cordon charge, funding high frequency public transport
- 42% developed, the rest of the site largely country park open to the public
- Closure of the airfield
- This is the only scheme in the country to have been positively endorsed by Friends of the Earth

The Refusal of Dunsfold Park's application

83. The application was turned down by WBC in 2008, and the appeal refused in 2009.
84. The Inspector's report addresses the issues raised by WBC and other objectors about the eco-village proposal in his conclusions. The Inspector's conclusions were endorsed by the Secretary of State in his determination letter. The Inspector's report and the Secretary of State's letter give a good benchmark for the issues that arise in the development of the site for mixed-use at large scale (in this application, 2,600 homes and a substantial increase in business space). Albeit this would now fall in the context of the new National Planning Policy Framework, they clarify what are, and what are not, the difficulties and advantages in bringing forward a similarly scaled and exemplary mixed-use scheme at this location.
85. In doing so, they lay to rest a number of concerns raised by WBC and other objectors to a mixed-use redevelopment of the site of the sort proposed – with broad commendation for many exemplary aspects of the proposals. However, the appeal failed on **one** key negative, transport impacts, primarily relating to the increased congestion on the A281. Additionally, it was regarded as 'premature' in that it should be considered within Waverley's LDF. In the latter regard, the criticism of the site as 'inherently unsustainable' in transport terms is however subject to a crucial caveat - the possibility that the proposal '*may well*' be the best option for addressing WBC's housing requirement when compared to other possible sites in the local plan process.

Positives

86. **No increase in noise:** Noting the existing activities have substantial noise impacts, including aviation and the testing of high performance cars, the appeal Inspector concluded the extra development would *not* impact much on existing traffic noise and would anyway be *offset* by the existing noisy activities ceasing.
- **The Secretary of State also concluded that the development "*would not affect the tranquillity of the area*".**
87. **A positive impact on views:** Concern was expressed by WBC and others about the impact on views from the Surrey Hills AONB. The Inspector concluded the development would have **less** visual impact on views from the AONB than the existing Aerodrome; the more muted colours and textures of materials in the village, plus the landscaping, would **better** blend the development into the surrounding countryside and *increase* the visual attractiveness of the site.
- **Like the Inspector the Secretary of State did not accept that the site in its present state makes a positive contribution to the appearance of the landscape around it. With regard to the views from the Surrey Hills AONB, the Secretary of State agreed with the Inspector that "*the proposed Eco-Village would result in the development having less visual impact on views from the AONB than the existing Aerodrome*".**

88. **Better public access:** The Inspector concluded the improved public access could only be of *benefit* to the wider community, through creating the country park and other publicly accessible open spaces within the village, and restoring path and cycle links that were broken when the airfield was created.
- The Secretary of State also considered that the improved public access to the site *“could only be a benefit to the wider community”*.
89. **The proposal’s excellent sustainability:** The Inspector described the evidence that the development would achieve a very high overall level of sustainability and a low carbon lifestyle as ‘*compelling*’, and ‘*well in excess of what is normally expected in new development and would compare favourably with other leading schemes both in the UK and abroad*’.
- Excluding the transport issues (see below) the Secretary of State, also noted the *“very high overall level of sustainability and the low carbon lifestyle which the development would achieve”*.
90. **An alternative to developing Greenfield sites elsewhere:** At the time of the Inquiry the South East Plan required at least 4138 new houses in Waverley by 2026. The Inspector stated it was ‘*clear that the Council faces a challenge in deciding how to accommodate these without relaxing policy constraints on Greenfield development. In that context the appeal proposal has many advantages. It would accommodate a large proportion of the houses needed over the life of the SEP on previously developed land with limited visual impact, without the loss of valuable agricultural land and in an area that currently has the lowest grade of protection*’. In fact, these words were prophetic – the current Waverley draft plan proposes releasing Greenfield land for 942 new homes.
- In regard to the Inspector's comments that the Council faced a challenge in deciding how to accommodate the residual SEP housing requirement for Waverley to 2026 the Secretary of State agreed that, within this context, the appeal proposal had many advantages.
91. **Meeting affordable housing needs:** The Inspector noted the severe shortage of affordable housing in Waverley, with annual completions coming ‘*nowhere near*’ the numbers needed, the situation deteriorating, and by that point around 1,500 people on WBC’s housing needs register wished to live in Dunsfold, Alfold or Cranleigh. During the Inquiry attention was drawn to the severe social and economic consequences of the failure to deal with the problem. In that context he believed the affordable homes offered in the scheme were a *material consideration* – but only if the overall scheme was otherwise acceptable. However, for the reasons given below, he considered that this was *“not a suitable site for housing development, at least in the context of the current proposals”*.
- In regard to the severe shortage of affordable housing in Waverley, and to the evidence about the social and economic consequences of the failure to deal with the problem, the Secretary of State accorded substantial weight to the affordable housing offered.

92. **Appropriate allocation of affordable housing:** The Inspector described claims that the proposed affordable housing would fail to meet the needs of those in housing need as *“plainly wrong”*. The Council’s objection was based on the fact that the affordable housing would be allocated not on the basis of the Council’s lettings criteria, but to give priority to those in housing need who already live or work near to Dunsfold Park or are seeking to do so. In the Inspector’s view of the nature of the development and, in particular, its objective of reducing carbon footprint and the need to travel, this was *“entirely reasonable”*, and in any case given the scale of local need and Waverley’s inability to meet it, the benefits would outweigh any concerns about allocation.
- **The Secretary of State agreed that the proposed method of allocating affordable housing within the appeal scheme is consistent both with the aims and objectives of the development, and with the SEP**
93. **Beneficial impact on social and economic problems of the Cranleigh area:** Having noted *“the way that emerging Government policy suggests that the past emphasis on concentrating new development on existing towns for reasons of sustainability may be changing and that freestanding rural settlements and urban extensions are coming to be seen as complementary”*, the Inspector commented that it *“is apparent from the evidence put forward at the Inquiry that there are considerable economic and social problems in the Cranleigh area and that the eco-village would be of very great assistance in helping to overcome them”*. However, he didn’t see this as overriding given the SEP had only just been approved by the Secretary of State and therefore had to be regarded as taking account of the then current Government thinking.
- **The Secretary of State agreed with the Inspector that the Eco-Village would be of very great assistance in helping to overcome the considerable economic and social problems in the Cranleigh area. However, he also agreed with the Inspector that this was not an overriding factor given that the SEP had only just been approved.**
94. **Thorough habitat surveys:** The Inspector concluded the habitat surveys carried out by Dunsfold Park Ltd seemed to have been very thorough and noted they had satisfied the requirements of English Nature and WBC.
- **The Secretary of State agreed with the Inspector that the habitat surveys seemed very thorough and satisfied the requirements of English Nature and WBC.**

Negatives

96. **The transport impacts:** The Inspector summarised the existing situation in these terms:
- i *“The site is in an isolated rural location and the road network around it consists primarily of narrow country lanes. There is severe congestion on the A281, the main trunk road in the area, and in some of the villages. The site is not served by public transport. Traffic generated by the existing commercial uses on the site includes HGV movements as well as commuter traffic. In so far as the existing situation is concerned, therefore, the site is not in a sustainable location. Moreover, little can be done to improve the existing infrastructure beyond minor alterations to road junctions.”*
97. The proposal sought to address this situation by making the village as self-contained as possible, with a series of measures designed to minimise the use of motor transport. Nevertheless, DPL’s own figures still concluded there could be 12,000 daily additional vehicle movements (the Inspector saw no reason to doubt this figure gave a reasonable impression of the scale of additional traffic likely to be generated by the development).
98. Furthermore, whilst he accepted that there was a high probability that the proposed traffic mitigation measures would be effective, he commented that keeping the movements down to 12,000 would rely on these measures, so the consequences of their failure would be very severe given the scale of the development and the inherently unsustainable location of the site. That said, in so far as alternative modes of transport are concerned, he confirmed the proposals would benefit the wider area as well as residents of the eco-village by introducing a high quality bus service, but that the Aerodrome was too far from Cranleigh for walking/cycling links to provide a viable alternative to the car (it is not, incidentally, clear why he thought a 1.8km dedicated cycle link was too great a distance for cycling).
99. Allowing that if the appeal were to fail there was a reasonable prospect that aviation, commercial and industrial uses would intensify (increasing the amount of traffic in any event), the additional daily vehicular movements resulting from the proposed eco-village (2,600 homes plus expanded business premises) *“would put severe and unacceptable pressure on an overstretched road network in which there is only limited scope for improvement.”*
100. He summarised in this way: *“I consider that the scheme would be of great value as an example of the part that low carbon built development can play in combating climate change. I see no reason to doubt that it would be seen as a development of national and international importance in that respect. Notwithstanding the reduced reliance on the private car, however, the development would still generate a considerable amount of additional road traffic. In that respect it would not be compatible with the existing transportation infrastructure of the area and would not be sustainable in transportation terms. Because of the unacceptable impact that the scheme would have on traffic congestion and its consequent impact on surrounding communities I*

do not accept that this is a consideration that is outweighed by the other advantages of the scheme.”

101. However, it is important to note that the Inspector also observed that the 5,000 new houses to be built in Waverley over the 20-year period of the SEP would have *“a major impact on traffic wherever they are placed”*. Noting the SEP and the development plan sought to focus new development on existing urban areas, he said: *“Whether or not this could be achieved in Waverley with a similar or smaller impact on traffic generation remains a matter of conjecture pending formulation of the LDF, preparation of which is still at an early stage.”* In other words, in due course in the development of the LDF the Inspector believed WBC should consider the traffic impacts of possible delivery of the housing elsewhere in the Borough, against those of development at Dunsfold Aerodrome. In that context, the Inspector held open the possibility that Dunsfold Aerodrome might, in the course of the development of the Waverley Core Strategy, well prove to provide the best option, but this could not be assessed in isolation.
- i **The Secretary of State agreed with the Inspector that, in so far as the existing situation was concerned, the site is not in a sustainable location and little can be done to improve the existing infrastructure beyond minor alterations to road junctions. He had regard to the fact that the proposals sought to make the village as self-contained as possible, and included a package of other measures designed to ensure that the scheme would minimise the use of motor transport. Like the Inspector, he accepted that the estimate of 12,000 daily additional movements gives a reasonable impression of the scale of additional traffic likely to be generated by the development.**
 - ii **The Secretary of State agreed with the Inspector that aviation, commercial and industrial uses would likely intensify if the appeal were to fail, and that this would have a direct impact on the amount of traffic, both private and commercial, using the roads in the area. However, like the Inspector, he considered that even allowing for that, the additional vehicular movements resulting from the development would put severe and unacceptable pressure on an overstretched road network in which there is only limited scope for improvement. Furthermore, the Secretary of State agreed with the Inspector that the consequences of the failure of the various measures included in the S106 Undertaking would be very severe given the scale of the development and the *“inherently unsustainable”* location of the site.**
 - iii **That said, the Secretary of State also agreed with the Inspector *“that the 5,000 new houses to be built in Waverley over the twenty year period of the SEP were likely to have a major impact on traffic wherever they are placed”*. He had regard to the Council's case that they would be best accommodated in an urban extension such as that then proposed at Slyfield on the outskirts of Guildford, and also to national policy as set out in PPS3 and PPS7 and the development plan, all of which seek to focus new development on existing urban areas. However, he agreed with the Inspector that *“whether or not this could be achieved in Waverley with similar or smaller impact on traffic generation”* remained a matter of conjecture pending formulation of the**

Local Development Framework, the preparation of which was still at an early stage.

- iv The Secretary of State agreed with the Inspector that the proposals would benefit the wider area as well as residents of the eco-village by introducing a high quality bus service, but that Cranleigh is too far away for access by either walking or cycling, and that there was some doubt as to whether some of the improvements could be achieved.
- v The Secretary of State agreed with the Inspector's conclusion that, notwithstanding the reduced reliance on the private car, the development would still generate a considerable amount of additional road traffic. Like the Inspector, he considered that in this respect the appeal scheme would not be compatible with the existing transportation infrastructure of the area, and would not be sustainable in transport terms.

Prematurity

- 102. At the time of the Inquiry, against the South East Plan housing requirements for Waverley the Council was required to accommodate 4,138 further new homes in the period to 2026. I have already reported the Inspector's comments that *"It is clear that the Council faces a challenge in deciding how to accommodate these without relaxing policy constraints on Greenfield development. In that context the appeal proposal has many advantages. It would accommodate a large proportion of the houses needed over the life of the SEP on previously developed land with limited visual impact, without the loss of valuable agricultural land and in an area that currently has the lowest grade of protection."*
- 103. He went on to explain that in the plan-led system the allocation of sites for housing is a matter for the development plan process. In preparing its LDF the Council would need to assess the needs of existing urban and rural settlements, while taking account of many factors including the existing infrastructure capacity.
- 104. Noting there was a presumption in PPS3 against the refusal of planning permission on grounds of prematurity, he concluded that despite this there were exceptional circumstances in this instance:

"The Dunsfold Park proposal is no ordinary planning application. Its scale is such that the EIP Panel [into the SEP] held that it would seriously unbalance the regional strategy. It would involve the expansion of the largest industrial estate in Waverley and provide, in one location, more than 60% of the Borough's housing supply for the remaining life of the SEP. The sheer scale of the development would have the effect of pre-empting proper consideration of the housing needs of the Borough and would pre-determine the outcome of the LDF process."

105. However, he also made a crucial caveat, that it was premature to reach a conclusion on the relative merits of this site being used to meet Waverley's housing needs compared to other locations in the Borough. In other words, the Council should not rule it out on the basis of the appeal finding. Rather, that in drawing up its LDF (now the draft 'Core Strategy'), it should be examined on an equal footing to the pros and cons of other ways of meeting the housing requirement:

"Despite its disadvantageous location relative to the surrounding transport infrastructure, the appeal site has many advantages. When seen in the context of other options the appeal proposals may well prove to be the best solution for meeting the SEP housing requirement. However, those other options have yet to be explored. The SEP had not even been approved at the time of the Inquiry and the Council does not as yet have an adopted Core Strategy. The superiority of the appeal proposals cannot be assumed. A decision to allow the eco-village to proceed at this stage, prior to the formulation of the LDF, would be premature and would effectively pre-empt the proper consideration of alternatives as part of the development planning process."

- i **The Secretary of State had regard to the Inspector's comments that WBC faced a challenge in deciding how to accommodate the residual SEP housing requirement for Waverley to 2026 and agreed that, within this context, the appeal proposal had many advantages. Like the Inspector, the Secretary of State also had regard to the requirement in PPS3 that local planning authorities should not refuse applications solely on the grounds of prematurity, but the Secretary of State agreed with the Inspector that a decision to allow the eco-village to proceed at this stage, prior to the formulation of the Local Development Framework, would be premature and would effectively pre-empt the proper consideration of alternatives as part of the development planning process.**

Conclusions

The Inspector's overall summary conclusions reflect these two key determining conclusions:

"Viewed in isolation the eco-village would be a truly outstanding example of the type of development needed to meet the challenge of climate change. Despite the efforts made to reduce dependence on the motor vehicle, however, the traffic generated by the development would have an unacceptable impact on an inadequate local road network. It would also conflict with policies in the SEP and WBLP that seek to focus development on existing urban centres and would have the effect of predetermining the outcome of the emerging LDF process. I consider that the harm so caused would outweigh the considerable environmental, social and economic benefits of the scheme. For that reason and having regard to the many other matters raised at the Inquiry my overall conclusion is that the appeal should be dismissed."

- i** The Secretary of State recognised the very high overall level of sustainability and low carbon lifestyle which the development would achieve. He concluded that the appeal scheme would not cause material harm to the character or appearance of the countryside. He attributed substantial weight to the 911 affordable homes offered by the appeal scheme.
- ii** Nonetheless, the Secretary of State concluded that the development would generate a considerable amount of additional road traffic and considered that this would have a severe and unacceptable impact on an overstretched local road network, and that the scheme would be unsustainable in transport terms. With regard to the proposed siting of major housing and industrial development in a rural area, the Secretary of State concluded that the scheme would conflict with the then national, regional and local policy.
- iii** Furthermore, he was of the view that a decision to allow the proposals to proceed at that time, prior to the formulation of the LDF, would effectively pre-empt the proper consideration of alternatives as part of the development planning process.
- iv** Overall, the Secretary of State concluded that the benefits offered by the proposed development did not outweigh its shortcomings and overcome the conflicts with the development plan and national policy which he identified, and therefore that the appeal should be dismissed.

KEY POINTS 5

- The development would achieve a very high overall level of sustainability
- It would have less visual impact and less noise than the existing Aerodrome
- It would have a beneficial impact on social and economic problems of the Cranleigh area
- It would make a significant contribution to meeting local housing needs

But...

- It would be 'unsustainable in transport terms'
- It would pre-empt proper consideration of alternative locations to meet housing needs

However...

- When assessed in the context of other options for meeting WBC's housing needs, the appeal proposals nonetheless *"may well prove to be the best solution for meeting the SEP housing requirement"*.

Waverley Borough Council Core Strategy: Pre-Submission Document

106. Despite the Secretary of State and the appeal Inspector stating that the appeal proposals *"may well prove to be the best solution for meeting the SEP housing requirement"*, in relation to Dunsfold Park, WBC's Core Strategy draft is explicit that, *"Dunsfold Park is not the Council's preferred location for accommodating housing growth"*.

107. Specifically, the short section devoted to Dunsfold Park states:

"The site represents an opportunity for employment development, intensification and expansion of activity to support the economic needs of the Borough. Dunsfold Park is not the Council's preferred location for accommodating housing growth."

108. Rather, Policy CS10 promotes the continuation and expansion of employment activity at Dunsfold Park:

"Policy CS10: Employment Development at Dunsfold Park

The Council supports the continuation and expansion of employment activity at Dunsfold Park, as identified on the Plan at Figure 1, subject to the following matters being addressed in a detailed Master Plan:

- appropriate uses including the development of renewable technologies;
- environmentally acceptable levels of aircraft movement;
- mitigating environmental impacts of development including noise and disturbance to adjoining communities;

- the need for access and transport accessibility to the site to be improved in view of its rural location;
- the location of development with particular focus on areas of previously developed land.”

109. The amount and location of housing is set out in **Policy CS2**:

“The Council will make provision for at least 5,060 net additional homes in the period from 2006 to 2028 (equivalent to 230 dwellings a year).

1,446 additional homes were completed between 2006 and 2012, leaving a residual target for the period 2012 to 2028 of 3,614 dwellings. These will be delivered by:

1. Promoting the use of land within settlements
2. Selected releases of Greenfield on the edge of the four main settlements of Farnham, Godalming, Haslemere and Cranleigh on land that is not within the Green Belt, AONB or AGLV, together with the release of the current Reserve Housing Site at Furze Lane, Godalming.
3. Small scale affordable housing schemes in accordance with Policy CS6
4. The use of suitable rural ‘brownfield’ land, including the surplus land at Upper Tuesley (the former Milford Hospital site).

It is anticipated that these dwellings will be distributed broadly as follows:-

Farnham:	1,295
Godalming:	642
Haslemere (including Hindhead and Beacon Hill):	380
Cranleigh:	836
Villages:	461

The identification of specific housing sites both within settlements and on Greenfield sites will be carried out through the proposed Development Management and Site Allocations DPD and/or local Neighbourhood Plans, as appropriate. The allocation of Greenfield sites will be for the delivery of no more than 967 new homes.

Additional Greenfield sites will be identified, but held in reserve only to be brought forward where there is clear evidence that the overall housing target cannot be achieved as a result of other projected sources of supply not coming forward and where the Council is not able to demonstrate a five year supply of deliverable housing sites.

The Council will not permit residential development that either alone, or in combination with other development, would have a significant adverse effect upon the integrity of the European Sites.

As explained above, the residual target figure of 3,614 includes an estimated requirement to deliver 967 new homes through selected releases of Greenfield land on the edge of settlements. It is proposed that these be distributed broadly as follows:-

Farnham:	434
Cranleigh:	433
Godalming:	100”

110. To examine this position, it is necessary to look in detail into several different aspects of WBC’s draft Core Strategy and supporting documents.

The Spatial Strategy for Waverley and proposed Greenfield development

111. WBC’s approach to the question of the future development of Dunsfold Aerodrome is in part informed by SEP policy SP3: Urban Focus and Urban Renewal, despite the Government having made clear its intention to abolish the regional plan - WBC making the point that pending its abolition the South East Plan remains part of the development plan for the area.
112. WBC emphasise that South East Plan policy SP3 focuses development in the region on urban areas in order to foster accessibility to employment, housing, retail and other services, and avoid unnecessary travel. In formulating policies, WBC says local planning authorities are expected to concentrate development within or adjacent to the region’s urban areas, and that the proposed Core Strategy is consistent with that approach.

POLICY SP3: URBAN FOCUS AND URBAN RENAISSANCE

The prime focus for development in the South East should be urban areas, in order to foster accessibility to employment, housing, retail and other services, and avoid unnecessary travel.

Local planning authorities will formulate policies to:

- i. concentrate development within or adjacent to the region’s suburban areas**
- ii. seek to achieve at least 60% of all new development across the South East on previously developed land and through conversions of existing buildings**
- iii. ensure that developments in and around urban areas, including urban infill/intensification and new urban extensions are well designed and consistent with the principles of urban renaissance and sustainable development**
- iv. use strategic land availability assessments to identify the scope for redevelopment and intensification of urban areas**

The spatial strategy is based on an urban focus, which aims to concentrate development and support services, thereby making the best use of already developed land and setting out opportunities for sustainable urban expansions. Policy SP3 sets out a regional level policy designed to achieve this aim, and includes a target for the proportion of new development on previously-developed land.

113. Based on this, WBC say that in order to achieve the aim of delivering the most sustainable development possible, the main focus for new housing and other development will be on the four main settlements of Farnham, Godalming, Haslemere and Cranleigh.
114. WBC do not however mention that SP3 looks to this policy in part to maximise the proportion of development on previously developed ('brownfield') land and so avoiding Greenfield sites. At the time the SEP was written, Dunsfold Aerodrome was considered by WBC as largely a Greenfield site – in fact it is now agreed to be 'brownfield'. WBC now proposes substantial release of Greenfield land in preference to housing development on what it now accepts is previously developed ('brownfield') land at Dunsfold Park.
115. Specifically, in order to ensure that the target for the number of new homes is achieved, the Council strategy for housing delivery includes making selected releases of Greenfield land around two of the main settlements in particular, Cranleigh and Farnham. WBC argues that these are the most sustainable locations to accommodate any significant releases of land for housing.
116. WBC says this is consistent with the NPPF because the release of Greenfield land outside settlements will be on land that is outside the Green Belt and also outside the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the designated Area of Great Landscape Value (AGLV).
117. However, the NPPF has a clear 'brownfield first' position. Nowhere in the draft does it state that WBC has a policy to prefer 'brownfield' land over Greenfield, and in practice this is clearly not its position. At the very least, the decision to release substantial development of Greenfield land at Farnham (454 homes on Greenfield land) and Cranleigh (453 homes on Greenfield land) needs to be justified by detailed comparison against alternative 'brownfield' options, and a mixed-use development at Dunsfold Aerodrome would be 'brownfield'. Such comparison needs to be detailed and like for like, using comparable transport impact assessments. This detailed comparative analysis has not been done, not least because WBC is not identifying specific sites at Cranleigh or Farnham at this stage, so the specific site impacts cannot be assessed.

The WBC Core Strategy pre-submission sustainability appraisal report by URS

118. The latest Sustainability Appraisal Report (URS, July 2012) provides a high level analysis of the environmental impacts of the draft Core Strategy and various options. Specific Greenfield locations cannot be appraised on a like for like basis with Dunsfold Aerodrome, because other specific sites have not been identified.

119. The appraisal does look at the policy proposed for Dunsfold Park (CS10) and also introduces an overview of the alternative approach to the proposed Greenfield releases of placing the 1,000 home shortfall at Dunsfold Aerodrome. In relation to CS10, the appraisal points out the Council fails to explain how the policy, given the existing airfield uses, can address the noise and disturbance impacts as suggested. URS also note the policy will increase 'inefficient' patterns of movement, and have negative climate change and pollution impacts. Oddly, it does not reference flood risk, although this *is* referenced as a negative in relation to possible housing on the site; it is not at all clear why flooding is an issue with housing on the site but not business uses.
120. The fact that the URS appraisal questions the ability of WBC to actually implement its proposed policy on key issues, including aircraft movements and noise and nuisance impacts, casts considerable doubt on how the policy can go forward. Certainly Councillors and the surrounding community should be made aware of these caveats. In the context of the up-to-date position, WBC's proposal to spend £100,000 on a master-planning exercise therefore appears a potentially futile expenditure of Council taxpayers' money without any real likelihood of determining or influencing what the site owner may propose.
121. Additionally, policy CS10 refers to any development at Dunsfold Aerodrome having "particular focus on areas of previously developed land". Previously developed land covers 86% of this very large site, so it is obscure what this 'particular focus' means. If in fact it is intended to refer to the much smaller northern employment complex referenced in the Employment Land Review, it should be noted this is out-of-date given that almost the whole Aerodrome is now accepted to be previously developed ('brownfield') land, and it begs the question of whether URS understood this in making their appraisal.
122. In relation to the appraisal of the option of siting the 1,000 home shortfall at Dunsfold rather than the Core Strategy draft proposals for Greenfield releases, the appraisal is equally cursory and contradictory. The South East Plan EiP panel is referenced as saying that in raising Waverley's allocation from 230 to 250 a year, that "additional capacity should first be sought within the urban areas but that if it was not possible then there seemed to the Panel to be limited potential for small adjustments to urban boundaries that would not conflict with the Green Belt, AONB or other environmental designations." However the context of raising the number from 230 to 250 generated a need for additional capacity of only 300, not the 1,000 shortfall being addressed by releasing Greenfield sites in Waverley's current draft Core Strategy.
123. Although the panel do reference Dunsfold Aerodrome describing the site as a major brownfield site, it is not clear if they accepted this given WBC were arguing (incorrectly) that most of the site (the Aerodrome) should not be considered previously developed.

124. In terms of the comparative appraisal between the proposed housing strategy siting housing on green fields at Farnham and Cranleigh, several elements of the URS report are baffling. The Dunsfold Aerodrome site is 'brownfield' land, and used as an Aerodrome. The appeal Inspector's report and the Secretary of State's letter both made it clear that the proposed new development would improve the visual attractiveness of the site. And the extensive parklands created positive ecological impact, whilst the scheme would foster exemplary low carbon life styles. And of course, a mixed-use development means cessation of aviation and automotive uses. Yet the Appraisal scores mixed-use development at Dunsfold Aerodrome worse than Greenfield developments elsewhere for impact on biodiversity, landscapes and townscapes, conserving and enhancing the historic environment, and using resources efficiently/minimising carbon emissions. This is simply not credible. Nor is any score given to the exemplary eco-business elements previously proposed in relation to economic growth or as a business location - despite being positively scored in reference to policy CS10.
125. As for the one real issue regarding Dunsfold Aerodrome - the transport impacts - no reference is given to the possibility of mitigation, or any detailed comparative impact of edge of town developments proposed. In this latter respect, the appraisal suggests the Greenfield options will positively encourage efficient patterns of movement, ignoring widely accepted evidence nationally that edge of town estates without local facilities generate substantial car movements as they often fail in practice to allow easy walkable access to services, and they are not likely to offer local employment to residents. Indeed, Cranleigh offers very little employment, with most travel to work being onto the A281 into Guildford (precisely the reason that development at Dunsfold Aerodrome is rejected). Some of those working at Dunsfold Aerodrome do live or would wish to live at Cranleigh (in the absence of a housing scheme at Dunsfold Aerodrome itself), but WBC regards Cranleigh and Dunsfold as unsustainably far apart in travel terms. Indeed, both WBC and URS simply seem to take it as a given that Greenfield development on the edge of Cranleigh and Farnham allow for more sustainable travel patterns than a mixed-use development at Dunsfold Aerodrome, but proffer no evidence for this (not least, perhaps, because no Greenfield sites are in fact identified so no detailed appraisal is possible).
126. In short, the URS appraisal fails to offer the detailed and open minded assessment the appeal Inspector and the Secretary of State called for comparing the impacts of possible Greenfield developments elsewhere in WBC to those of a high quality sustainable mixed-use development (and associated closure of aviation and automotive uses) at Dunsfold Aerodrome. And like the WBC Core Strategy, URS appears to rely on the Regional Strategy EiP panel view of Dunsfold Aerodrome as an unsuitable site for a 2,500 home mixed-use development, despite that being in a very different context, with different housing numbers from those URS assess (1,000).

The Greenfield releases proposed

127. The Core Strategy indicates the broad locations for the Greenfield releases, but the detailed assessment and allocation of specific sites will be dealt with through the forthcoming Development Management and Site Allocations DPD. So no detailed analysis is possible. This is contrary to the NPPF, which looks to these detailed site identifications to be made (and appraised) as part of the Core Strategy process: Paragraph 47 of the NPPF is clear that the local plan needs to ensure that the full, objectively assessed needs for market and affordable housing are met, ***“including identifying key sites which are critical to the delivery of the housing strategy over the plan period;”***. It is hard to see how the proposed Greenfield releases are anything other than critical to WBC’s strategy for housing delivery.
128. WBC also argues their Greenfield approach is consistent with the SEP and the view of the Panel of Inspectors who conducted the EiP for the SEP. It is true that in its report dealing with housing numbers and distribution in WBC, the Panel said that if it was not possible to find capacity for housing within settlements then there appeared to be some limited potential for small adjustments to urban boundaries that would not conflict with the Green Belt, AONB or other environmental designations. However, the context of the SEP was that the great majority of the land at Dunsfold Aerodrome was at that time erroneously treated as Greenfield by the relevant planning authorities. The Inspector at the inquiry into the eco-settlement subsequently confirmed its status as ‘brownfield’, previously developed land and the Secretary of State agreed with that assessment. In that context, prioritising the release of Greenfield sites over any kind or scale of mixed-use development on the ‘brownfield’ land at Dunsfold Aerodrome raises substantial policy issues that at the least merit a detailed comparative analysis of the respective sustainability.
129. Setting aside the Furze Lane site in Godalming, the intention is that Greenfield releases will be almost equally split between Farnham (454 homes) and Cranleigh (453 homes). WBC argues this distribution between them takes account of the constraints and opportunities within these settlements. Whilst Cranleigh is smaller than Farnham, WBC suggest it contains suitable sites for planned growth without other constraints, whereas Farnham is the largest of the main settlements but they argue it is more constrained by factors such as the SPAs and its transport and water infrastructure constraints.

Impacts on the Special Protection Areas (SPAs)

130. In relation to the Thames Basin Heaths SPA, the development proposed at Farnham does raise a profound question mark over the prioritisation of developing Greenfield land here. Clearly if new residential development could be directed to areas outside the 5km buffer of the Thames Basin Heaths SPA then it minimises the risk of development having a significant impact on the SPA. However, the Council argue that if housing growth were directed away from Farnham it would have two adverse consequences. *“Firstly, the Plan would be much less responsive to the housing needs arising in the Farnham area. Secondly, it would put added pressure on other locations. In particular, it would either put pressure on the Green Belt, AONB and AGLV, or it would result in additional pressure on land around Cranleigh. Whilst Cranleigh can*

accommodate some of the planned growth, it is considered that if a significant additional allocation were proposed here, to off-set housing that could otherwise be directed to Farnham, it would unbalance the overall strategy". What is not said is that there is a large brownfield site at Dunsfold Aerodrome, not just Greenfield sites on the edge of Cranleigh, to be considered.

131. WBC does concede that if routine monitoring shows the overall housing target cannot be met owing to problems of providing mitigation for SPA affected schemes, *"then the Council will consider bringing forward additional Greenfield sites on the edge of the main settlements"*. So the possibility of even greater Greenfield release is raised, again without any detailed comparative impact assessment of mixed-use development at Dunsfold Aerodrome, which could both relieve the risk to the SPAs and also mitigate any risk of still larger Greenfield releases in future. All this despite the comments of the appeal Inspector and the Secretary of State that when assessed against other options for delivering Waverley's housing numbers, Dunsfold Aerodrome might prove the 'best solution' notwithstanding the then traffic issues identified when refusing the appeal on the DPL proposal taken in isolation.

The number of new homes

132. This Core Strategy has been prepared in the context of the NPPF. As previously indicated, the NPPF says (para 47) 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, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.**
133. WBC acknowledges *"it is an expensive and sought after place to live. The average price of a house is £428,195, which is significantly higher than the national average of £245,426. Waverley has a significant need for more affordable housing. There are currently almost 3,500 households on the Council's Housing Needs Register in housing need. Of these, about 2,000 households are considered to be in housing need with a local connection (ie the households in the highest priority bands A to C in accordance with the Council's allocation scheme). Of these, 500 are already in social housing but seeking to move to different accommodation. The Strategic Housing Market Assessment (SHMA), which was published in 2009, also highlights the need for more affordable housing. It identifies an annual shortfall of 515 affordable homes, not taking into account new affordable homes expected to complete each year. By comparison, over the last five years, an average of 48 new affordable homes have been provided each year."*
134. In terms of the need for housing, the consultants' "Balancing Housing Markets" model also indicates a combined need for affordable and market housing of 706 homes a year. In WBC's own words, *"This evidence suggests a high need both for more affordable housing as well as a strong demand for market housing"*.

135. However, WBC go on to state that, *“it does not follow that this full need/demand can or should be met. Waverley is an attractive place to live and this explains the strong demand for housing. In fact evidence shows that a very significant proportion of the projected population increase derives from an assumption that the very high levels of net migration into Waverley will continue.”*
136. This dismissal of its own evidence contrasts with the requirement of the NPPF to meet the *“full, objectively assessed needs for market and affordable housing in the housing market area”*. And, if anything, the evidence suggests WBC is under reporting the scale of the comparative problem facing those needing housing in Waverley:
137. House building in Waverley comes nowhere near the level needed to keep up with the rising population and changing demographics, as the housing starts figures show (and which show a much worse housing starts opposition in recent years than the historic housing completions figures which WBC rely on) :

2006/07: 180
2007/08: 210
2008/09: 70
2009/10: 160
2010/11: 50

So housing starts have dropped 72% - the 58th worst drop out of the 67 South East local authorities

And compared to the Government’s official household increase annual projection for Waverley of 440pa, the 2010/11 housing starts at 50 in 2010/11 is the 62nd worst shortfall out of the 67 SE LAs.

138. WBC reference high house prices in Waverley. In fact the data shows they are not just ‘high’: affordability is amongst the very *worst* in the South East, the region itself with the worst unaffordability outside London:
- **Median house price 2010: £325,000 – only 4 of 67 SE Councils are more expensive**
 - **Median house price/median earnings ratio 2010: 13.13 – 66th worst affordability of 67**
 - **Lower quartile house price/lower quartile earnings ratio: 12.14 – again 66th worst of 67**
139. To justify their failure to address the scale of housing need identified in their own evidence, WBC leans heavily on the SEP for their housing numbers rather than the SHMA, even though the Coalition Government intends to abolish the SEP. The SEP set a housing target for Waverley of 5,000 new homes in the period 2006 to 2026 (ie 250 a year, compared to the evidence of the SHMA of a need for 706 homes a year).

140. The Council says it has had to *“decide whether or not to set a new locally derived target for the number of new homes”* given that the South East Plan is to be replaced. They argue that until the SEP is abolished it remains the starting point for considering the housing requirement for the area, *“with the additional issue of the NPPF and what it says on housing supply”*, and that there is an extensive evidence base that underpins the South East Plan both in terms of the overall housing target for the region, and the distribution of housing across the region. They do not say that this evidence base is now very dated, and even then fell far short of meeting WBC's evidenced housing needs.
141. Despite resting their case entirely on the SEP, WBC does not even propose to deliver the housing numbers that the SEP required of them. The housing target now proposed is for the delivery of 3,614 new homes between 2012 and 2028. Together with the 1,446 new homes completed between 2006 and 2012, this would result in the delivery of 5,060 dwellings between 2006 (start date for the South East Plan) and 2028 (the projected end date of this Plan) at an annual average of *just 230 a year*, compared to the SEP figure of 250, and the SHMA identifying a need for 706 homes a year.
142. The significance of the 230 homes a year figure is that it was contained in the submitted SEP before it was increased to 250 by the Secretary of State on the recommendation of the SEP Examination in Public (EiP) Panel.
143. The Council seeks to argue that *“this approach strikes the right balance between delivering new homes needed in the area, whilst recognising the rural character of Waverley and the various constraints that limit the potential to accommodate new homes in a sustainable way.”*
144. The work carried out in 2005 to determine the district level allocations in Surrey was largely based on the findings of an updated 'Surrey Housing Potential Study'. That was an assessment of the potential to accommodate growth within settlements and on other suitable rural 'brownfield' land. In that light when the South East Plan Examination in Public Panel was considering housing numbers, it accepted that there was *“very little”* potential for WBC to contribute more than its allocation of 230 a year in a sustainable manner. But it did recommend raising it from 230pa to a minimum of 250pa. It is hard to see how WBC can justify to the EiP into its draft Core Strategy cutting the number back again now, given it relies on the SEP to justify not meeting the evidenced housing need.
145. WBC is arguing it cannot accommodate even the 250 homes pa required by the SEP, yet the biggest change since the SEP was agreed is that WBC now accept Dunsfold Aerodrome comprises a large area (well over 200ha) of 'brownfield' land in the Borough which they previously considered mainly Greenfield.

Employment Land Review

146. WBC's Employment Land Review commissioned in 2008 is also seriously out-dated in respect of Dunsfold Aerodrome. It was apparently concluded before the Appeal Inquiry into the eco-village application for Dunsfold Aerodrome, and classes Dunsfold Aerodrome as mainly Greenfield (see 5.3.34 onwards). The subsequent update in 2011 makes no mention of the NPPF and no mention whatsoever of Dunsfold Aerodrome, or its newly acknowledged status as an 86% brownfield site. In fact it goes further by saying that the update is only that, and that matters should be referred back to the 2008 document.
147. The update also in section 3.11 onwards is confusing and again no mention of Dunsfold Aerodrome, notwithstanding the Certificate of Lawful Existing Use and Development (CLEUD) application and Inspectors decision. In sum, no reliance can be placed on the Employment Land Review in relation to the role of Dunsfold Aerodrome and proposed policy CS10.

Neighbouring Authorities

148. WBC state that Whitehill/Bordon in East Hampshire and the Aldershot Urban Extension (AUE) in Rushmoor are ***"two particular locations which, because of the scale of development envisaged and the fact that the housing market areas extend across Borough boundaries, are likely to meet some of the housing needs arising in Waverley"***. This is a crucial argument for WBC, as they need to address the fact that whilst relying on the SEP for their housing numbers they actually propose 230 homes a year rather than the 250 homes in the SEP. And, of course, the SEP housing target for WBC itself falls well below the evidenced need in the SHMA of 706pa. Moreover the target is framed as a minimum level of delivery. In all respects, they need to explain how the shortfall may be made up.
149. However, the case that Whitehill/Bordon and AUE can carry part of WBC's housing shortfall is undermined by the responses it received from the relevant Local Authorities, which make clear that they are struggling to meet their own evidenced housing needs even after these developments are taken into account.

• East Hampshire and the Whitehill/Bordon eco-town

150. In relation to Whitehill/Bordon, WBC met East Hampshire District Council (EHDC) on 30 April 2012. According to Para 3.9 of the EHDC Duty to Co-operate document, since WBC is currently not proposing to meet the full South East Plan housing target, ***"WBC requested EHDC to consider whether that unmet need could be attributed to the Whitehill and Bordon Eco-town, housing target of 4,000"***.
151. WBC's Duty to Cooperate report references EHDC conceding that Whitehill Bordon would likely house some of those otherwise looking to live in Waverley – but cross border migrations are part of their own housing needs assessment (all SHMA take account of people needing to move between areas, as well as the needs of people already within the area to be housed there). So it is unsurprising that whilst EHDC accept that some of those who will live in Whitehill/Bordon may come from

Waverley, they do not accept that part of the housing planned in Whitehill/Bordon could be counted against WBC's evidenced housing needs shortfall. Quite the contrary: EHDC Duty to Cooperate document states they replied to WBC that ***"it would currently be unreasonable to formally state this"***.

152. In any event the SEP figure for Waverley of 250 homes pa was determined at a time when the Whitehill/Bordon eco-town was also planned to deliver 5,500 homes. Since Whitehill/Bordon is now planned to provide just 4,000 homes, it is hard to see how this could justify WBC providing for lower housing numbers than it was required to in the SEP.

- **Rushmore and the Aldershot Urban Extension (AUE)**

153. In relation to the Aldershot Urban Extension, the Rushmoor Core Strategy was adopted in October 2011 without reference to provision against Waverley housing needs. Again WBC approached Rushmoor to ask if Waverley's unmet need could be attributed to them, and (like EHDC) Rushmoor said no.

154. WBC's 'Duty to Cooperate' document states:

"The Rushmoor Core Strategy issues make provision for 1,745 more homes than required to meet the South East Plan target (this includes the identified and 4,000 new homes planned as part of the Aldershot Urban Extension (AUE)). In the South East Plan the amount of housing envisaged at AUE was 4,500. However, SE Plan Policy WCBV3 made it clear that in the event that the AUE cannot be released for development, there was no expectation that an equivalent amount of land in the Borough or elsewhere should be allocated to meet the overall SE Plan target for Rushmoor. In view of the anticipated 'oversupply' in Rushmoor relative to the SE Plan target, together with the clear links in housing market terms between parts of Waverley and Rushmoor, Waverley Council is of the view that some of the new housing in Rushmoor, which will be taking place on previously developed land, will meet wider than just local needs identified within Rushmoor, including needs arising in Farnham. In response, Rushmoor BC accepts that there is an overlap between housing markets in Rushmoor and Farnham and that housing development in Rushmoor, particularly at the AUE, would meet some of Farnham's housing needs. However, it states that Rushmoor's 'over provision' would not offset the need to provide housing elsewhere in the wider area to meet the overall strategic needs of the sub region. It draws attention to the fact that the Core Strategy annual housing target is equivalent to 374 dwellings a year set against a Strategic Housing Market Assessment (SHMA) that shows an annual requirement for 1,000 homes."

155. In short, although Rushmoor plan to provide more homes than required as a minimum by the SEP (over the next five years an average of 330pa compared to the SEP figure of 310pa, and over the whole plan period 2010-2027 an anticipated 373.5pa), their SHMA still shows this is a huge shortfall compared to Rushmoor's own evidenced housing need – it cannot be taken to offset any shortfall in WBC's housing delivery.

Dwelling Provision pa*	Affordable Need Shortfall pa**	Market Demand Shortfall pa**
South East Plan		
310	681	329

156. Nor are the AUE and Whitehill-Bordon proposals the only issues that emerge from the duty to co-operate. In respect to at least two local authorities, there is or may be pressure on Waverley to address neighbouring housing shortfalls:

- **Guildford**

157. The SEP plan required relatively high levels of housing delivery in Guildford, delivery now in severe doubt given Guildford's successful legal challenge against the plan to release land for 2,000 homes north east of Guildford has left a substantial 'black hole' regarding the SEP housing provision on the border of Waverley, exacerbated by plans for the Slyfield Urban Extension being put on hold. According to Guildford's Interim Housing Paper presented on 24th May 2012 to the Executive, WBC also approached them ***"seeking a view on the statement that the provision of homes, employment and other services within Guildford can meet the needs both within Guildford Borough and other areas within the zone of influence of Guildford, including Waverley"***.

158. The Guildford response acknowledged the inter-relationship between the two boroughs, set out its current plan-making position (including that a local housing number had not yet been set at that time), explained Guildford Borough's high identified housing need, that this would be very challenging to address in full, and ***"accordingly that it is unable to plan for a portion of Waverley Borough's housing need."***

159. WBC's Duty to Cooperate report references the Guildford response as follows: ***"As identified in the South East Plan, much of Waverley is within the same housing market area as Guildford. This is why Waverley, Guildford and Woking jointly commissioned the SHMA 2009. Migration trends also illustrate the close link between Waverley and Guildford in housing market terms. Guildford has not yet identified a housing target for its emerging Core Strategy. Guildford has recognised that new housing provided in Guildford may be taken by residents in Waverley and vice versa. However, it has also made it clear that it has a significant need for new homes and that it will be a challenge just to plan to meet its own housing needs. Therefore, it has said that it cannot accept or plan for additional housing needs on behalf of another Borough, including Waverley. As Guildford has not yet set its housing target for the emerging Core Strategy, it is not possible to assess whether there will be any knock-on impacts on Waverley arising from the number of new homes to be provided in Guildford."***

160. The final sentence in WBC's report on Guildford touches on a more likely scenario – that Guildford will fall so far short of meeting its own housing needs (due to Green Belt restrictions) that unless development on the greenbelt is agreed, Guildford may need to look to neighbouring authorities to assist in meeting this need under the Duty to Cooperate (the 'knock-on impacts referred to above by WBC). In fact, at the time of writing, Guildford appear to be following WBC's path of proposing their SEP 'option 1 proposal', in this case 322 homes pa – far short of the final Guildford SEP figure of 422 homes pa. So when Guildford do come forward with their Local Plan proposals, as things stand they are very likely to need to press neighbouring authorities (including WBC) to assist them, under the duty to co-operate, to meet their unmet housing needs.

- **Chichester**

161. Chichester District Council commented in detail in response to WBC's proposed housing target in Policy CS2 in highly critical terms.

"The proposed requirement of 230 dwellings a year (the 'Option 1' figure) is close to the South East Plan requirement of 250 dwellings a year. However, the draft Core Strategy is being prepared to take account of the likely abolition of the South East Plan and should therefore show how the housing targets have been derived following national guidance set out in the NPPF. This sets a presumption that 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; or that specific policies in the NPPF indicate development should be restricted.

"Although housing provision in the Waverley Core Strategy has been increased since the January 2011 draft Core Strategy, Chichester DC remains concerned that the Core Strategy housing figures are not clearly justified or based on up-to-date evidence of objectively assessed needs. The evidence base prepared to support the South East Plan is a useful starting point, but is now several years old. Chichester DC is not able to support the level of housing provision in the Waverley Core Strategy, pending further justification and up-to-date evidence. We consider that the level of housing included in the Core Strategy should be based on an up-to-date assessment of housing requirements. It should indicate whether the housing target would be sufficient to meet this up-to-date assessment and then set out the justification for any reduced housing target, in accordance with NPPF guidance. If it is considered that development proposals in neighbouring authorities could contribute to Waverley's housing needs this also should be supported by evidence, for example, via agreed statements with these neighbouring authorities. We will not be [able] to support the Core Strategy until these points are addressed.

"A further consideration is the likelihood that there will be relatively low provision of housing within the South Downs National Park (SDNP) which covers a large part of Chichester District. This is likely to result in additional pressures for housing development in neighbouring areas outside the National Park. In particular, the north of Chichester District (outside the National Park) is characterised by small rural settlements with limited scope to accommodate additional housing to make up any shortfall arising from the National Park."

162. In essence, Chichester argue that WBC are failing to address the requirement of the NPPF to meet their own evidenced housing needs, and that this may negatively impact on Chichester. The concerns expressed by Chichester mirror my own concern that WBC's draft Core Strategy clearly fails to address the scale of its own evidenced housing needs – a failure that is very hard to justify given the large area of 'brownfield' land at Dunsfold Aerodrome which both the appeal Inspector and the Secretary of State have recognised might provide WBC's best option for addressing its housing needs, yet which WBC rule out for any housing provision at all.
163. Furthermore, around Waverley all the other neighbouring Councils are failing to meet their SHMA evidenced housing needs. As a result, the actual position is that WBC is unable to establish that any of its unmet housing need evidenced by the SHMA will be met by neighbouring authorities. Even those planning to exceed their SEP housing numbers fall far short of meeting their own evidenced housing need, and have refused to confirm that WBC can count any of their housing provision towards its own unmet need.
164. In these circumstances, it is clearly misleading for WBC to reference the AUE and Whitehill/Borden developments as potentially contributing to meeting WBC's housing shortfall. WBC, in the light of the Duty to Co-operate consultation responses, should at the least withdraw the Draft Core Strategy statement that Whitehill/Borden in East Hampshire and the Aldershot Urban Extension (AUE) in Rushmoor are ***"two particular locations which, because of the scale of development envisaged and the fact that the housing market areas extend across Borough boundaries, are likely to meet some of the housing needs arising in Waverley"***. In so far as this references WBC's own unmet evidenced housing needs, this simply cannot be asserted.

Transport

165. WBC's Core Strategy explains that ***"new development that will generate a high number of trips to be directed toward previously developed land in sustainable locations or will be required to demonstrate that it can be made sustainable to reduce the need to travel and promote travel by sustainable modes of transport"***. It adds that all new development should be appropriately located in relation to public transport and the highway network. What WBC does not provide is a full study of the comparative traffic impacts and travel related sustainability of different options of the sort the Dunsfold Park appeal Inspector expected to take place.
166. The SCC 2012 revised Transport Evaluation has been updated to take into account the new revised local housing target, and assess the impact of the proposed broad locations of development in the Core Strategy on the strategic and local road networks. It also considered the cumulative effect of developments outside of Waverley, in particular, Queen Elizabeth Barracks in Hart, Aldershot Urban Extension in Rushmoor and Whitehill-Borden in East Hampshire. This analysis concludes that major highway infrastructure is not required to support the level of growth planned in Waverley. However, it says that some schemes in urban areas such as Farnham, and at key junctions, will be required to support and manage the planned development contained in the Core Strategy.

167. The analysis also acknowledges that the A325 and A31 corridors in and around Farnham town centre are very sensitive to the additional traffic from strategic developments external to Waverley and would require significant highway infrastructure to mitigate impacts if estimated forecasts were achieved. Therefore, it recommends that further work is undertaken to understand and more accurately predict the impacts of the proposed external developments, specifically Whitehill/Bordon.
168. What none of this does is carry out a detailed comparative study of the transport and other impacts of including some level of mixed-use development at Dunsfold Aerodrome as an alternative to substantial development at Farnham and Cranleigh. This despite the acknowledged severe congestion issues around and in Farnham, the SPA impacts, and the fact that substantial development (much of it Greenfield) at Cranleigh is certain to have at least some of the transport impacts on the A281 that led to the development proposed at Dunsfold Aerodrome being refused.
169. Given that an integrated development at Dunsfold Aerodrome would involve a package of transport mitigation measures difficult or impossible to replicate with a series of Greenfield housing estate developments at Cranleigh or Farnham, it is not obvious what the best option is without such detailed analysis. The appeal Inspector clearly believed a comparative study should be undertaken before ruling out Dunsfold for housing in the Core Strategy, saying *“Despite its disadvantageous location relative to the surrounding transport infrastructure, the appeal site has many advantages. When seen in the context of other options the appeal proposals may well prove to be the best solution for meeting the SEP housing requirement.”*
170. My conclusion is that SCC should be asked to revisit its transport assessment of the impacts of development at Dunsfold Aerodrome at the 2,600 originally proposed, or around 1,000 to address WBC’s housing shortfall and avoid unnecessary Greenfield development at Cranleigh and Farnham. This should allow a like for like assessment of the transport impacts of the draft WBC Core Strategy proposals against the alternative developments possible at Dunsfold Aerodrome.
171. This is especially so since SCC has not undertaken a comparable analysis of the Core Strategy proposals, partly because they told me their own approach has changed and partly because WBC fails to identify specific Greenfield sites. Moreover, the NPPF significantly alters the test for transport impacts that was applied under previous planning policy. The NPPF is clear that (para 32) ***“Development should only be prevented or refused on transport grounds where the impacts of development are severe”***. It is certainly not at all clear that a smaller development at Dunsfold Aerodrome of 1,000-1,250 would have a severe impact.

172. Setting aside any impression that WBC may now have an in-principle mind-set against any housing development at Dunsfold Aerodrome, there appear to be two key presumptions behind the WBC preference for development on the edge of Farnham and Cranleigh:
- a
 - i First, their view that development on the edge of these existing urban centres is intrinsically more sustainable than delivering an integrated new community (of similar scale) at Dunsfold Aerodrome or similar. Yet nationally there has been a rapid evolution of thinking away from the assumption that edge of town residential development is by definition the most sustainable solution purely because key services are in the town centre - the preconception that governs the WBC approach.
 - ii It is generally now accepted in planning that housing developments on the edge of urban areas can in practice generate significant traffic impacts. This is because typically housing estates on the edge of town do not contain local services such as a shop, pub, leisure facilities, cafe, or work places, and are sufficiently disconnected from the services that many or most journeys to them are by car. Nor is public transport necessarily well connected into such new estates. In contrast, schemes like DPL proposed where all of these facilities are within walking distance, and the ability to build in high quality public transport services and disincentives to car use can better mitigate undesirable travel patterns.
 - iii Indeed, WBC's 'Infrastructure Providers consultation report' (which is, incidentally rather old to be cited in the 2012 Duty to Cooperate submission, as it is dated 2008), states that providers cited the 'difficulty in providing sustainable bus services to peripheral developments off the main existing routes'.
 - iv The NPPF specifically says: ***"The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development."*** This directly echoes the view of the Inspector and the Secretary of State regarding the Dunsfold application that it might be the best solution for meeting WBC's housing needs when compared to the transport and other impacts of alternative delivery options such as the Greenfield development now proposed in the WBC Draft Core Strategy.

- b.
 - i
 - Second, clearly reliance is being placed by WBC for ruling out a mixed-use/housing development at Dunsfold on the appeal decision. Yet when consulting SCC regarding their current view of the transport impacts of the previously proposed mixed-use scheme at Dunsfold, they indicated that their approach to transport planning had evolved to one of managing inevitable congestion on many routes like the A281 arising from whatever form of development takes place feeding into the road network. This appears to underlie the SCC position that the proposals for development at Cranleigh and Farnham in the draft Core Strategy can ‘be managed’ with packages of measures drawn from the transport strategies of the Surrey Transport Plan, and limited highway capacity infrastructure improvements (of which a number are proposed for Farnham).
- 173. This change of approach by SCC implies that a future application for Dunsfold Park might receive a very different response from the Surrey transport team (albeit a suitable travel plan and traffic impacts study would still be required to identify and resolve specific issues arising). However, the current position of SCC has not it appears been sought by WBC (or URS in their comparative sustainability appraisal of housing at Dunsfold Aerodrome). Therefore the transportation response from Surrey to development at Cranleigh, which will impact the A281, bears no relation to the very different approach of SCC to the similar transport issues that arose with the Dunsfold Aerodrome proposals four years ago. To determine whether development at Dunsfold Aerodrome may in fact be the best option, as the appeal Inspector and the Secretary of State advised, WBC should seek from Surrey a like-for-like transport impact assessment.

The NPPF and Waverley’s Draft Core Strategy – a summary

- 174. In terms of the WBC Core Strategy, much of the early work and the evidence base predates the NPPF. Like a lot of Core Strategy proposals at present coming forward, the NPPF elements have been ‘bolted on.’
- 175. In terms of how the draft proposals may be regarded by the Inspector at the EiP, five key elements stand out in the context of the WBC proposals and the ambitions of DPL:
 - i
 - Waverley is proposing 230 homes per annum. The housing needs are assessed in their SHMA at 706 homes pa. The final South East Plan figures were 250 pa. Since the NPPF says 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, including identifying key sites which are critical to the delivery of the housing strategy over the plan period”** this shortfall will need a very strong justification compared to the SHMA. WBC in large measure explain this in terms of the SEP having been worked through and approved in detail – but that makes their decision to go for the even lower Option 1 figure of 230 rather than 250 very hard to defend. It is clearly likely that Waverley will be

pushed to a higher housing figure (and will need a 5% margin, and it will almost certainly be cast as a minimum).

- ii Even at 230 pa, WBC is planning to deliver significant numbers of new homes on Greenfield sites, some of which also impact on their SPA – which WBC admit may require even higher Greenfield releases elsewhere if their mitigation measures are unsuccessful. However, the NPPF is clear that ***“Allocations of land for development should prefer land of lesser environmental value”***, and that they should ***“encourage the effective use of land by reusing land that has been previously developed (‘brownfield’ land), provided that it is not of high environmental value”***. WBC justify their Greenfield releases by arguing that it has no other option – but this ignores the significant ‘brownfield’ land at Dunsfold Aerodrome, which is clearly also of lesser environmental value than the Greenfield land proposed for release. WBC also point out that the SEP Inspectors turned down the proposal put to them for a mixed-use scheme at Dunsfold Aerodrome, but at that time the site was considered Greenfield land.
- iii The deliverability of WBC’s plan is questionable.
 - A number of the sites they rely on have failed to be developed over many years now and are reportedly unviable at present.
 - They rely on developments impacting the Special Protection Areas – admitting that non-deliverability of mitigation measures may require an increase in Greenfield releases.
 - They rely on housing developments in neighbouring authorities to make up part of the shortfall, but cannot show under the Duty to Cooperate that this has been agreed by those authorities; in fact, it has not, and those authorities themselves are not meeting their evidenced needs.
 - Finally, the Core Strategy indicates the broad locations for the significant Greenfield releases, but the detailed assessment and allocation of specific sites is to be dealt with through a forthcoming Development Management and Site Allocations DPD. This is contrary to the NPPF, which looks to these detailed site identifications to be made (and appraised) as part of the Core Strategy: ***“identifying key sites which are critical to the delivery of the housing strategy over the plan period”***.
- iv In relation to the transport issues around the Dunsfold Aerodrome application, the planning policy position of the NPPF is very different from previous policy. The NPPF states that ***“Development should only be prevented or refused on transport grounds where the impacts of development are severe”***.
- v The NPPF is explicit that ***“The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development”***. There is no

indication that this process of comparing the option of new settlements to other alternatives for delivery has actually been subject to a detailed assessment, the site at Dunsfold Aerodrome could clearly have the potential for such a development, and the Appeal Inspector and the Secretary of State both indicated that this might prove to be the most sustainable option for delivery in Waverley, but it seems to have had no serious analysis against the Greenfield releases proposed.

176. I am often asked how the NPPF “requirements to deliver” gel with the Localism Agenda. There is a view that 'localism' means that Councils are empowered to ignore any Government's wish for 'sustainable development' and, where there is opposition to development, to minimise it all over again. Certainly it is true that since the Coalition Government's formation 'localism' has been a key element of its response to the public opposition to 'top-down' requirements for development. But there is confusion about what this actually means.
177. By stripping out regional-level housing numbers, the Government's 'Localism' approach asks for need to be identified and understood at a local level: figures will not be handed down from on high. However, the evidence needs to be sound – the Local Authority is the driving force, but it has to evidence its numbers against local needs, and according to the NPPF that requirement cannot be ducked. Even more fundamentally, 'Localism' asks for urgent delivery to meet this need.
178. So Local Authorities are empowered to find their own solutions, but they cannot wish the issues away. If they do fail to provide the evidence or fail to identify the means to deliver against housing need, then the presumption in favour of sustainable development kicks in. Localism provides the opportunity for communities to decide how to tackle local needs – but it does not allow them to ignore local needs.
179. There is already clear evidence that Inspectors are challenging Core Strategy proposals from Local Authorities that fail to address up-to-date evidence of housing need. Most recently, as this report was finalised, the Inspector suspended the Reigate and Banstead Core Strategy submission for six months. The Inspector's reasons are similar to the position Inspectors have recently taken with a number of Core Strategies, and illustrate some of the hurdles the WBC draft Core Strategy may face:
 - i Duty to Co-operate: From the Council's statement entitled 'Cross boundary issues and cooperation' it was not clear to the Inspector that meaningful cross boundary working had taken place. Whilst the statement set out the process of consultation with neighbouring planning authorities and other agencies that has underpinned the preparation of the RBCS, the Inspector felt that it failed to draw out the main strategic cross-boundary issues and their outcomes.
 - ii Housing scale and distribution: The Inspector identified four main concerns in his paper:

- a) Whether an up-to-date evidence base had been used to determine the need for market and affordable housing, and whether continued reliance on the South East Plan housing requirement is appropriate.
 - b) Whether the sites identified in the Strategic Housing Land Availability Assessment (SHLAA) provided sufficient margin or tolerance to be confident that the housing requirement in years 1-10 would be delivered.
 - c) As part of its approach to Broad Locations, the Council appeared to be quantifying windfalls, which would be expected to come forward throughout the plan period.
 - d) Given a shortfall in the identified housing supply in the second half of the plan period, a more positive approach is required towards Sustainable Urban Extensions (SUEs) in terms of their location, scale and timing.
- iii Green Belt: The Inspector acknowledged that, because virtually all land outside the defined settlements of the Borough is Green Belt, the approach to be taken to the Green Belt is inextricably linked with the issue of SUEs. Given the strategic nature of the RBCS and the importance of Green Belt as a policy tool, he believes that the policies of the plan should acknowledge the need for Green Belt releases and give greater guidance on their implementation.
 - iv Gypsies and Travellers: The Inspector's final Key Concern is that the RBCS falls significantly short of what is necessary to satisfy the recently published "Planning policy for traveller sites".
180. It is hard not to conclude that on this basis WBC faces significant potential challenges relating to failing to meet its evidenced housing needs, its reliance on the SEP, its argument that its housing needs cannot be met due to constraints on release of land due to its environmental and landscape qualities, its use of windfalls, the failure to consider sustainable urban extensions, and the margin of tolerance in the SHLA (especially considering sites such as the major East Street Development have been stalled due to lack of viability).

KEY POINTS 6

- *“Dunsfold Aerodrome is not the Council's preferred location for accommodating housing growth”.*
- The Council supports the continuation and expansion of employment activity at Dunsfold Aerodrome, but its sustainability appraisal (by URS) questions WBCs ability to actually control aviation noise and pollution as proposed
- WBC's policies for Dunsfold Aerodrome are founded on the SEP but WBC is likely to be challenged by the Inspector that this fails to address the requirements of the NPPF, particularly that:
 - Greenfield sites for housing are proposed in preference to the 'brownfield' land at Dunsfold Aerodrome on travel/access to services grounds, but there is no like-for-like evaluation of the travel issues, and the NPPF prioritises brownfield land
 - WBC proposals do not meet the NPPF requirement to meet the *“full, objectively assessed needs for market and affordable housing in the housing market area*
 - WBC's claim that Waverley's housing shortfall against its evidenced needs will be partially met by Whitehill/Bordon and the Aldershot Urban Extension are contradicted by the responses of the relevant local authorities

The potential for increased aviation use at Dunsfold Aerodrome

181. The Aerodrome is presently used for private flights, both fixed wing and rotary, including the Surrey Air Ambulance. In addition, the Aerodrome is used by various military units for flight training and exercises.
182. The infrastructure at Dunsfold Aerodrome, in particular its east-west orientated main runway, operational control tower, hangars, fire station, aprons, parking areas and relative remoteness from urban areas, makes the Aerodrome particularly suitable for flying activities and operations. Approach and runway edge lighting is installed. There are turning areas at both ends of runway 07/25, effectively doubling the runway width at these locations. The two other runways (and the perimeter track) provide ample space for aircraft manoeuvring and parking. There is also an area for aircraft manoeuvring and parking adjacent to the stub link taxiway from runway 07/25 towards the buildings complex. The Aerodrome has the benefit of a number of existing hangars, with floor space of 3,692 sq.metres, 3,044 sq.metres and 1,032 sq.metres, respectively (a total of over 7,000 sq.metres). Emergency fire and rescue cover up to Category 5 can be arranged.

183. The current air-ground radio is Civil Aviation Authority (CAA) licensed. The Control Tower is suitable for any future task, and the building is large enough to accommodate all the normal air traffic control (ATC) requirements of a small-to-medium sized airport. There are a number of National Air Traffic Services (NATS) operated, ground-based, navigational beacons in the vicinity of the Aerodrome sufficient for the purpose of any future development, including the Midhurst (MID) VOR beacon to the south-west. Dunsfold is part of the Farnborough ATM “clutch” airfields whereby the Air Traffic Service Unit (ATSU) provides radar facilities for “controlling” arrivals and departures and feeding them into the National Airspace System (NAS).
184. The Aerodrome has the advantage of being outside Controlled Airspace, thereby not requiring radar controllers based at Gatwick, for example, to co-ordinate flights into and out of Dunsfold Aerodrome. Dunsfold Aerodrome is currently unlicensed, but it has facilities for advance Customs, Immigration and Special Branch notification for flights to and from destinations outside mainland UK.
185. The CAA granted the Aerodrome permission to levy charges as an airport under the Airports Act 1986. This means that the site benefits from substantial permitted development rights conferred upon such airports by the Town and Country Planning (General Permitted Development Order). The airport operator can therefore implement those permitted development rights in order to erect new hangers and other aviation-related buildings and uses.

Government Aviation Policy

186. Current Government aviation policy is set out in The Future of Air Transport White Paper (2003), as confirmed in the Farnborough Airport appeal decision (10 February 2011). The starting point of Government aviation policy is that “we must make best use of existing airport capacity” (ATWP, Foreword).
187. Moreover, the NPPF states ***“When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation”***. In terms of national policy, it is therefore very difficult to see how WBC could resist the growth of aviation at the Aerodrome unless it is closed to allow a mixed-use redevelopment. DPL show convincing evidence of the potential aviation demand.

Aviation Enquiries

188. DPL has been pursuing the objective of a mixed-use development at Dunsfold Aerodrome, which would involve permanent cessation of the aviation activities. Until they give up on mixed-use non-aviation development there, they necessarily refuse aviation related enquiries that would involve long term contracts and investments that would pre-empt a housing related scheme. However, they have made it clear that were this to prove impossible, they would look to build up the aviation

operations at the Aerodrome. This raises the question of what interest there might in fact be.

189. I have already set out the conclusions of the WS Atkins report, which saw aviation related activity as one of three potentially viable ways forward for the site.
190. However, that report is now quite old, and was in the context of the then still operational BAe establishment and its skills set. Subsequently, WBC commissioned Alan Stratford and Associates to analyse the aviation potential. Their report is dated April 2011. DPL state there are a number of factual errors in the report. Crucially, they wrongly attributed problems during BAe's operations to limitations applied to Gatwick airspace. This was such a serious error that DPL obtained a letter from the CAA confirming that it was not the case. Dunsfold Aerodrome's proximity to London Gatwick is not a constraint on Dunsfold Aerodrome, except for the movement of large passenger aircraft using Long Final Approaches on runway 25, where liaison with Gatwick would be a requirement, although the misunderstanding in this report seems to have reinforced a widespread local belief that it is. It appears their conclusion that Dunsfold Aerodrome could not be developed as a commercial airport is founded on their misunderstanding of the Gatwick airspace limitations, which do not apply other than above. Also, they did not seem to be aware that Farnborough as a "Clutch" Airfield, has agreed to provide radar coverage for Dunsfold Aerodrome.
191. More generally, WBC's position relating to aviation at Dunsfold Aerodrome appears to be based on their analysis of four areas of constraints:

i Planning policy and specifically policy T9 of the South East Plan

In an e-mail to Cranleigh Parish Councillor Ken Reed in March 2010, WBC said policy T9 *"does not refer to Dunsfold and only makes reference to Gatwick, Heathrow, Southampton and Kent International. The supporting text notes that the other smaller airports could play a valuable role in meeting local demand and contributing to regional economic development. How relevant to Dunsfold this is debatable not least as I can't imagine there is much locally generated demand for air travel in the Dunsfold area."* In fact, the supporting notes to T9 refer to smaller airports playing a valuable role in meeting local demand and contributing to regional economic development. Policy T9 concludes, ***"Subject to relevant environmental considerations, their development should be supported and regional and local planning frameworks should consider policies which facilitate growth at these airports"***.

ii The lack of an aviation market for more flights at Dunsfold Aerodrome

Dunsfold Aerodrome has good access to London, Surrey and much of the South East relative to other smaller airports in the South East. It also has good proximity to the major UK airports at Gatwick and Heathrow, which is a material consideration for some operators particularly in the aviation maintenance and servicing sector. A list of approaches received by DPL for aviation related activity is appended below. I am also familiar with work carried out in relation to the potential market for aviation related businesses

at Newquay Airport, after its former role as RAF St.Mawgan ceased a few years ago. Considerable potential was identified for Newquay, and Dunsfold is in many respects better placed.

- iii Development control policies relating to countryside, environment and transport

The WBC Chief Planning Officer said in the email of March 2010 to Cllr Reed quoted above that *“Ultimately the scope for expansion would have to be tested by the development control process.”* However, Dunsfold Aerodrome has extensive permitted development rights and can erect aviation related buildings. The definition of an operational building in Part 18 of the GPDO is *“a building, other than a hotel, required in connection with the movement or maintenance of aircraft, or with the embarking, disembarking, loading, discharge or transport of passengers, livestock or goods at a relevant airport”*.

- iv Lack of available airspace

This appears to be based on the misunderstanding of the advice in the April 2011 Alan Stratford and Associates report relating to Gatwick airspace. Given the CAA confirmed that it was untrue, it appears clear that Dunsfold’s proximity to London Gatwick is not a significant constraint on Dunsfold Aerodrome, other than for large passenger-carrying aircraft when using runway 25.

- 192. In terms of the market for aviation, this is hard to establish with absolute certainty whilst DPL continues to turn away long-term aviation contracts because they do not wish to be constrained from pursuing the mixed-use development option. This inevitably raises scepticism regarding the reality of any approaches cited, and equally deters many in the aviation sector from approaching DPL in the first place given that their position is well known.
- 193. Nonetheless, DPL did provide the following details regarding approaches they have received, which casts some light on the issue:

***“Most recently, a major aircraft maintenance and repair company has held serious discussions to construct a new 9,300sm (100,000 sf) hangar, a 1,800sm (20,000 sf) office building and a new 4,600 sm (50,000 sf) parts warehouse for 737 and 757 type aircraft. This company’s requirements for new buildings could be met using the airport-related permitted development rights at Dunsfold Aerodrome. Discussions have been put on hold.*”**

i Other enquiries have included:

- a A major aircraft maintenance company who wanted to take a long term lease of Hangar 67, our specialist aircraft paint shop for the painting, refurbishing and refitting of Jet aircraft and helicopters up to and just below Boeing 737 size**
- b AIPC of Taiwan who wanted to renew the manufacture of the Optica, a type of observation aircraft, in Hangar 57**
- c A new-start aircraft maintenance company who wanted to take Hanger 86 for private jet maintenance up to Challenger 600 size**
- d A major airfreight company who wished to relocate themselves here using 737 size aircraft**
- e A number of charter aircraft and helicopter companies have expressed a desire to locate themselves at Dunsfold Aerodrome both for business and maintenance**
- f Discussions have been held with a number of flying schools both for helicopter and fixed wing instruction.**
- g A serious enquiry for Hangar 132 for maintenance and repair of a major International company's Global Challenger corporate jet**
- h The Marquis of Milford Haven who wanted to base his Challenger 600 at Dunsfold Aerodrome in hangar 132**
- i There have been constant enquiries for small, medium and large jet aircraft parking and maintenance which has grown considerably within the last 12 months, presumably as the result of the credit crunch as corporate jets revert back to the leasing companies. Some of these aircraft have already started to arrive on site.**
- j Currently Dunsfold Aerodrome is in discussion with the National Air Traffic Services (NATS) for a 20-year facility for the installation of a national radar training centre. A particular attraction for them is that the facility could be constructed under Dunsfold Aerodrome's PD rights.**

KEY POINTS 7

- WBC's own Draft Core Strategy sustainability appraisal (by URS) casts doubt on the Council's position that it can assert control over aviation to control associated noise and disturbance as policy CS10 implies. Dunsfold Aerodrome's proximity to London Gatwick is not a constraint on Dunsfold Aerodrome, except for the movement of large passenger aircraft using Long Final Approaches on runway 25, where liaison with Gatwick would be a requirement.
- DPL has received but so far refused approaches for aviation related business that would involve long term contracts and investments that would pre-empt a housing related scheme. Currently NATS is proposing the installation of a national radar training centre.
- Dunsfold Park has extensive permitted development rights and can erect aviation related buildings. The definition of an operational building in Part 18 of the GPDO is *"a building, other than a hotel, required in connection with the movement or maintenance of aircraft, or with the embarking, disembarking, loading, discharge or transport of passengers, livestock or goods at a relevant airport"*.

PART 2

COMMUNITY ENGAGEMENT REPORT

Dunsfold Park Ltd's perspective

194. During the course of this review, I have had a series of discussions with Dunsfold Park Ltd – Jim McAllister (Chief Executive), The Earl of Liverpool (Chairman), Gerry Forristal (Head of Project Management), and Jamie McAllister (Development & Planning Director). This section explores the history of their involvement with the site and their ambitions for it, in a question and answer session I conducted:
195. **Q : What were the circumstances at the time of your acquisition and your understanding of the site's potential? What was your objective?**
196. **A:** A number of years ago The Rutland Group had acquired another airfield from BAe and we got to know them quite well and they became our tenants on that particular airfield. They were aware that Rutland's Chief Executive lived near Dunsfold Aerodrome and they mentioned that it was no longer economic for them to continue the production of aircraft at Dunsfold. They liked the way in which Rutland had conducted business with them and thought the company might be equally good in dealing with Dunsfold Aerodrome following its closure.
197. The site had evolved over the years from a World War II Airfield to an important aviation and manufacturing base. Rutland had plenty of previous experience in dealing with these ex-military sites. The last one we had acquired was Thorpe Arch Estate in Yorkshire, for example, (formally Royal Ordnance Factory no.9) a large site of more than 400 acres and with some 2,000,000 sf of buildings which Rutland successfully let and that now employs some 4,000 people.
198. BAe let us have a copy of "The Impact Study on the Closure of British Aerospace Dunsfold", by W S Atkins (January 2000), which WBC, SCC, Surrey Economic Partnership and BAe themselves had commissioned on the effects which the closure of the Aerodrome might have on the local area, together with their conclusions as to what the future of the site might be. We thought the report was pretty comprehensive and balanced in the way in which it examined each of the potential futures – aviation, manufacturing, housing – but we were in agreement with their option 3 that a mixed-use, business and residential development, by removing the aviation, was probably the best solution for the future of the Aerodrome. The proposal had all of the elements that attracted us and we decided that this was the type of project that suited them.

199. **Q:** **The site now hosts 100 businesses employing over 700 people – how was this achieved?**
200. **A:** Rutland have had considerable experience in dealing with major employment sites having managed more than 1,000 tenants nationwide. That experience enabled us to grow Dunsfold Aerodrome from a zero base in 2002 to where we are today. As well as the aviation uses, Dunsfold Aerodrome now has over 100 occupiers who, between them employ over 700 people. It is one of the largest sites, in land area terms, that we have ever dealt with and it is also the largest single employment site in the Borough of Waverley – some 600 acres, almost 500,000 sf of buildings of various kinds, a 5km peripheral track surrounding three runways, the main runway of which is some 2km long and in excellent condition. The buildings had been well maintained during BAe's occupation.
201. We realised early on in our corporate life that not all tenants want to enter into long-term fixed leases. We were one of the first companies to adopt a flexible approach to our lettings – anything from one month to 25 years – which proved very successful at a time when many people were not offering that approach. We applied this approach to the buildings at Dunsfold Park and the response was excellent. This helped us to quickly establish the demand for the site as business space in Surrey is in short supply, particularly as our prospective tenants did not have to make long-term commitments to us, in the first instance.
202. **Q:** **What are the strengths of the site for business, its potential, and the limitations on the business development as you see them now?**
203. **A:** The site has over 120 buildings of various sizes, which gives us enormous flexibility to adapt them to meet the needs of both existing and prospective tenants. We have a significant number of new businesses who are looking for smaller starter units at the outset, but who then look to move to larger premises on the site as their businesses grow and develop. It is a fact that more entrepreneurs start up businesses in Surrey than almost anywhere else in the UK and we have a number of these at Dunsfold Park. Our CEO is a member of the Surrey University's 100 Club, which meets regularly to receive presentations from new start-up companies.
204. One of the big limitations in this area, which was identified in the WS Atkins Report, is the lack of affordable housing in the Borough – Waverley is one of the most expensive places to live in the UK. A number of the tenants on site and in the wider area complain about the difficulty of attracting staff, particularly young staff, because they cannot afford to live locally.

205. **Q:** **After acquiring the site, how were your plans for the eco-village developed – over what period, with what community and stakeholder and Local Authority engagement?**
206. **A:** It made sense to use the Atkins Report as our baseline position. We sequentially went through and tested the various planning “gates” to look at the criteria for the alternative re-use and re-development of the site. Having done so, we arrived at similar conclusions to the WS Atkins’s third option, and we concluded that the most viable future for the Aerodrome was as a mixed-use business and residential community. The instruction we gave to our Professional team was to design an exemplar community for the 21st Century.
207. WBC had set up the first Special Interest Group (SIG) to work with us in 2003 but they brought that to an end when the then Labour government set up a new Planning and Compulsory Purchase Bill in 2004, which had a whole new raft of policy documents which had to be complied with first. The most significant of these was the Local Development Framework (LDF), which is essentially the Core Strategy for the Borough. We looked to this work as the best avenue for exploring our proposal.
208. However, in 2007, the Inspector appointed by the Secretary of State to examine WBC's LDF did not open the Inquiry as he said their LDF document was structurally faulty and would not pass its test of soundness. He requested that they start over again. By this stage it was seven years since the site had closed and five years since we had started working with WBC. We decided that we could not wait for the next LDF, as we did not know how long it would take WBC to complete their second attempt, so we submitted our Master Plan proposal in 2008.
209. **Q:** **Why 2,600 homes – how was this determined – not more (it is a very large site), or less?**
210. **A:** At its peak under BAe, there were some 1400 people working at the Aerodrome. For a site of this size, with almost 500,000 sf of space, that was not a particularly intensive level of employment density. Our consultants advised us that the site could, very easily, accommodate up to 2,000 employees. This, in turn, helped our team to determine the number of houses as a key part of our plan was to create the right live / work balance on the site and in the "Cranfold area" (the cluster of villages surrounding the site) in order to generate less traffic movements on the surrounding roads by reducing the numbers of commuters. As well, the reduction of carbon emissions generated by car borne traffic was an important factor and a policy favoured by the previous and current government with their carbon reduction commitments.

211. Given the size of the site, a number of key decision makers asked why we were not going for greater numbers, say 5,000, to comply with eco-town status. However, a full-blown eco-town would have had to have a secondary school and substantial shopping outlets to assist in its stand-alone sustainability and we felt this would have a detrimental effect on nearby Cranleigh and Glebelands School, for example, so we resisted any move towards higher numbers. We wanted to complement Cranleigh, not compete with it as a stand-alone new town. Our solution was to set up a footpath, cycleway and bus system connection to Cranleigh, as we owned almost all of the land in between.
212. **Q: What was your view of the detail of the appeal dismissal?**
213. **A:** Ironically, the appeal was dismissed almost on the same day that our Master Plan won the Francis Tibbalds Award for the best potential new development in the UK. Both the Inspector and the Secretary of State complimented almost every aspect of the Master Plan but expressed concerns about one issue, transport, and it was essentially refused for that reason. However, the Inspector also concluded that wherever WBC put its 5,000 unit housing allocation in the Borough, there would be inherent transport issues to contend with and that the application was premature in that the pros and cons of our proposal should be considered by comparison to other options for the Borough. He specifically said that when WBC brought forward their Local Plan, compared against all the other sites in Waverley it might well be that Dunsfold Aerodrome, almost 500 acres of which are classified as a 'brownfield', might still prove to be the best solution for the Borough.
214. **Q: Since the appeal, has your response been to look again at aviation, business development, reconsider the original plans, await Core Strategy work?**
215. **A:** Since the appeal decision we have tried to work towards the Inspector and Secretary of State's recommendations with WBC – after all, they said our scheme should be considered seriously as possibly the best solution to Waverley's needs. But we have to say we feel that so far WBC has not sought to work with us and has paid scant attention to the Secretary of State's advice. WBC continue to be of the view, relying on the transport advice expressed in 2008, that a mixed business and residential use is not the Borough's preferred option at Dunsfold Aerodrome.
216. We believe that were the Transport Strategy to be looked at again today, the result would be much different. WBC also relies on the SEP – but that was when it was assumed by the planning authorities that our site was Greenfield, which it is now accepted it is not. And we do not understand this view at WBC, since the future of this site without housing will inevitably centre on the underlying aviation consent, which is - without housing - its most valuable potential asset and USP. Whilst we continue to work with the Borough to enlarge and protect the other core businesses now established on the site, they will only ever occupy a small part of the Aerodrome site – it is aviation that is its unique asset if no mixed development is allowed. Ironically, our preference for housing means we have not accepted aviation proposals so far

– but if it becomes clear that our proposals have no realistic prospect of success then an aviation future it will be, because that is the permission we have and what the business would have to rely on and exploit to survive and prosper.

217. **Q:** **You have pursued an appeal about the underlying aviation permission – what is your understanding of the position?**

218. **A:** It is now common ground between WBC and DPL that the underlying permanent planning consent for the site is for the manufacture, repair and flight testing of aircraft (the 1951 Planning Permission). This consent is unrestricted as to the time and frequency of aircraft movements. Whilst there is currently a difference of opinion over the status of the “temporary planning permissions” granted by WBC which created the current temporary restrictions on flight times and frequency, the site will in any event revert back to this unrestricted permanent aviation use in 2018 at the latest. The point of the current court case is that could even be as early as 2013.

219. When we first acquired the site we had hoped, as WBC were in receipt of their own consultant's report which set out the sequential manner in which the site could be dealt with, that the Aerodrome's future use would be determined within a reasonable scale of time. Today it is 12 years since the Atkins report was commissioned and the site was vacated by BAe, and still the future of Dunsfold Aerodrome is undecided. As a business, we cannot continue in limbo indefinitely because we cannot continue to ignore the financial drain this creates on us forever. We need to know soon what the Aerodrome's future is for the sake of our business, our employees and all the other businesses on the site.

220. We will, within a relatively short space of time, be left with no option but to revert to the underlying aviation consent to enable us to respond to the aviation enquiries we have received. That's why we now needed to establish exactly what our aviation permissions allow, so we know exactly what our options are and what we can offer. We therefore submitted an application for a CLEUD to establish the current lawful use of the Aerodrome. The Inspector concluded that the unrestricted 1951 permission would apply from 2018, when the temporary consents expire. Whilst the underlying unrestricted permission is now established, our legal advice is that as a matter of law the current temporary permissions cannot override the 1951 unrestricted consent – that is what we have put to the High Court. This application is due to be heard in April 2013. We need to do this, because we need to know what our options are if housing is finally ruled out here.

221. **Q:** **There is currently only limited aviation use; what has limited this, and what is the potential?**
222. **A:** Currently, flight activity operates at a level that is consistent with the scope of the “temporary permissions” that have been granted by WBC, but when we revert to the 1951 permission (whether in 2013 or at the latest, 2018) the numbers and the times become unrestricted. We have had many approaches over the years but until we know what the future of the Aerodrome is, we have not been able to respond to the many enquiries in any meaningful way because that meant committing to an aviation future, which so far we have not wished to do.
223. **Q:** **What is your current engagement and relationship with WBC – and how would you ideally look to take forward developing the strategy for the site?**
224. **A:** At a basic level (ie, development control, environmental health, etc) there is a healthy dialogue with Council Officers and regular meetings to discuss routine matters. At a strategic level, meetings have been less frequent and less productive. One aspect that we did not find particularly easy was that until now the local Councillors were reluctant to meet with us to discuss the Aerodrome and its future. WBC's attitude to the issue of 'probity' was unlike anything we had ever come across before in any other part of the country. It was, therefore, difficult to develop an open dialogue with them. The effect of this was that over recent years the Councillors have been able to talk to those opposed to both housing and aviation at the site, but not to us. Not unnaturally, we felt this created an unbalanced and biased view of Dunsfold Aerodrome and the activities taking place here. Fortunately, this has changed and relationships with local members are much healthier. There has been an improvement in dialogue and we have been encouraged by the establishment of a Special Interest Group (SIG) once again, with whom we hope to have a full and open dialogue about the site and its future.
225. **Q:** **What of other stakeholders? Surrey County Council? Others?**
226. **A:** One of our first actions on acquiring the site was to hold a public meeting at Dunsfold Park. More than 300 people attended and we explained that it was our normal practice to have an open and on-going dialogue with the communities in which we work. As well, we regularly attended Parish Council Meetings in the four parishes which surround the site (namely, Alfold, Cranleigh, Dunsfold and Hascombe). We also published a quarterly Newsletter that was circulated locally and uploaded to our web site, keeping both our tenants and local residents abreast of what was happening at Dunsfold Aerodrome.

227. For a period of time we also held regular meetings with immediate neighbours on Stovolds Hill and Dunsfold Road and on behalf of Surrey CC and the local police we hosted their liaison meetings with the Surrey Traveller and Gypsy communities. These meetings tailed off, as there was little to discuss, as the minor problems on the access roads were resolved. We held a frequent series of presentation and meetings for local stakeholders whenever there was something to say.
228. Unfortunately the Parish Council meetings became unproductive because we felt they became dominated by those opposed to almost anything we did or sought to achieve. As with the improving relationship with WBC, we would like to think this can change, and we would be keen to explore a suitable forum to work with the Parishes more effectively again. For the general public, we have always had an “open door” policy at the site for anyone who wishes to speak to us on any matter relating to the Aerodrome.
229. **Q: There is some history of complaints from neighbours about noise, flights outside the agreed limits, heavy lorry traffic. How do you view this? How do you monitor your noise and other impacts, how have you sought to engage with the community?**
230. **A:** Records show that up to 6,500 military aircraft flew from Dunsfold Aerodrome each year in the BAe era. Given the then state of aircraft noise, in noise terms the current equivalent would be in excess of 25,000 modern Jet aircraft (source: Bickerdyke Allan, specialist noise consultants). As well, gate records show that there were up to 4,500 daily traffic movements in and out of the site, approximately 10% of which were commercial vehicles. One local Parish Councillor told us that Stovolds Hill was known locally as the “Wacky Races” at shift change during BAe’s ownership and that she exited her property with extreme caution and considerable difficulty at these times.
231. In fact, when assessed and compared against other similar sites, the complaints against Dunsfold Park are extremely modest in numbers. A recent review of WBC’s entire complaints log in connection with the site showed a total of circa 250 complaints in total over the last 10 years, with over 60% of these coming from the same four households. A significant proportion of the balance was found to be unconnected to the site at all, being overflying military or civilian aircraft unrelated to us. This compares very favourably to other large airfields or motoring venues which in some cases receive this quantum of complaints per month, if not more frequently. Our research shows that the vast majority of local residents support what we are doing on the site; Top Gear is hugely popular for instance, and when we devoted the entire studio one week for the benefit of local residents, it was five times oversubscribed. When there was a move to refuse the renewal of Top Gear's planning consent, stemming from a Parish Council objection, more than 900 local people signed a petition supporting the programme.

232. Some complaints are understandable when we appear to operate outside our planning conditions. Currently, planned flight activity operates at a level that is consistent with the scope of the “temporary permissions” that have been granted by WBC. However, any airfield is required by law to accept flights on diversion, in an emergency or where returning flights have been delayed by weather or other extraneous circumstances. No airfield can ever refuse a late or diverted flight, whatever the reason. To refuse to do so could result in a fatal accident and subsequent investigation by the CAA. Inevitably these may be outside the times normally permitted, which may generate complaints if the circumstances are unknown. As well, some of our neighbours operate their own helicopters from adjoining properties. As it is difficult for observers to know where an aircraft takes off from or lands, everyone tends to assume that any aircraft in the vicinity is coming to or from Dunsfold Aerodrome. In addition, the Air ambulance operates here and that is, of course, entirely unrestricted as to flight numbers.
233. All motoring and other uses at Dunsfold Park have planning consent and operate within agreed noise limits which are monitored by independent consultants. That information is available to WBC upon request. As well, the entire site is surveyed by CCTV cameras and we have used these CCTV records upon occasions to disprove false allegations about activities on the site.
234. In terms of engaging with the local community, we always try to inform in advance about events that are taking place and this information is published on our website.
235. That said, as the fact that 60% of the complaints come from just four households this may suggest, there are, as with any site of this sort, a small number of people who feel very upset by what we do. There are a number of people who live around the Aerodrome, who acquired their properties on or just before the closure of BAe’s operation and before DPL took up occupation and perhaps had the wrong impression that the site was closed for good. There was little activity during this period and this gave some people a false impression of what was and is again, a large and very busy employment site which contributes very significantly to the local and national economy.
236. Moreover, there had been a view amongst some local residents that when BAe left there was a planning requirement that the airfield returned to farmland. This view predates our acquisition of the site, and has its roots in the introduction of a planning condition in 1980 that suggested the site would revert to agriculture once it was vacated by BAe Systems. That never reflected the reality of the planning history of the site, but this, understandably, misled some residents. A small group expended significant resources over the years fighting BAe and WBC (including taking them to Judicial Review in 1999 in an attempt to revert the site to agriculture). That antagonism transferred to our activities at Dunsfold Aerodrome, and given the history of it we are not sure that they can ever be reconciled to the present reality. That said, a mixed-use development that saw the aviation permanently ended would perhaps be a step in the right direction for them.

237. **Q:** **How would you respond to the argument that the site should not be considered for housing on transport impact grounds?**
238. **A:** The simple fact is that there is not a “do nothing” option for a ‘previously developed brownfield’ site of this size in this part of Surrey. As the Planning Inspector and the Secretary of State decided at the appeal, 86% of the site – over 500 acres – is ‘previously developed. Under the Government’s NPPF ‘previously developed sites must be considered for development before the release of any Greenfield land’. Regardless of whether the site is used for housing, business, or reverts to its underlying consent for aviation, there will be traffic impacts. Currently, we operate at a level that is consistent with the scope of the “temporary permissions” that have been granted by WBC. However, the underlying permanent permission has no such restriction.
239. The transport argument when put forward is frequently inconsistent and out of date. WBC's proposed 5,000 additional homes, wherever they are located, will produce additional traffic and a site such as Dunsfold Aerodrome is one of the few locations that could actually help to alleviate this problem. WBC in its current draft LDF, for example, is proposing significant increased housing units in Cranleigh, many on Greenfield sites. The effect of this on the traffic through the High Street and on the villages of Shamley Green, Wonersh and Shalford, does not seem to have been considered. All of this traffic will still end up on the A281. We think Dunsfold Aerodrome is much better suited as it can connect directly to the A281 and relieve Stovolds Hill and Dunsfold Road – and we would put in place the innovative measures to limit traffic and support public transport that we previously proposed, and which these other developments could not.
240. The transport concern also ignores the benefit that would come from locating housing on the site to meet the needs of the workforce here. One of the main difficulties businesses experience on the site is finding staff who live locally, or housing existing staff, who have to relocate from elsewhere and have to commute large distances to and from areas where they can afford to live. The sons and daughters of current employees find it almost impossible to afford a home locally – a huge issue for local families but also for local businesses who are watching the next generation of employees priced out of the community. One of our proposals for our earlier scheme was to give first option for the market affordable or rental units to people working on the site. That would house many local people and reduce current traffic impacts of our operations – impacts that would only grow with WBC’s plan to increase our current activities without allowing any housing here.
241. Most importantly, any development in Waverley will affect traffic – whether in and out of Cranleigh, in Farnham, or anywhere else. That is why the Inspector and the Secretary of State both concluded that our proposals should be properly considered against the alternatives, which so far we do not believe they have been.

242. **Q: Your ambitions now?**

243. **A:** It has always been our ambition to create an exemplar community in place of the Dunsfold Aerodrome. The Government and the Town & Country Planning Association have recently put forward a proposal to “Re-imagine Garden Communities for the 21st Century” and have set out the benefits and lessons in bringing forward comprehensive planned communities much like the garden communities of the last century. This is much in line with our own thinking and our corporate ethos, as the winners of many environmental awards.

244. It remains our ambition to create an award winning community which both Waverley and Surrey could be proud of, reflecting these garden community principles. We are not wedded to the numbers of housing units in our previous application - but do need to be clear that without a minimum number of houses, it becomes difficult to contribute in any significant way to the improvements in transport and infrastructure which are badly needed in the area and more importantly, remove the aviation. And to create a genuine community, a garden village, does need sufficient size to support a new primary school, shops, and other village services. Time has moved on and numbers will be dictated by current standards of density, environment etc, and what Waverley’s housing needs require – but we do think we are a better option than the Greenfield developments now proposed by WBC. Already, we have advanced green technologies on the site; our solar farm produces green energy for our tenants and a new garden community would be a fitting project to sit side by side with these advanced industries, providing the homes local people, including many employees on our site, so desperately need.

245. **Q: With the WBC Local Plan draft ruling out development at Dunsfold Aerodrome, is this crunch time for developing the site one way or another, or is it a waiting game?**

246. **A:** One thing it most certainly is not is a waiting game. There is not a “do nothing” option - businesses cannot stand still and in this current harsh economic climate, the Government is pressing all of us to play our part in getting Britain back on its feet to ensure employment and particularly, employment of the young is an important part of our economic recovery. If WBC determines that a mixed-use residential and business community is not an option for Dunsfold Aerodrome then we will have no alternative but to rely on the Aerodrome's underlying aviation consent. The Government has made it very clear that there is an extreme shortage of aviation capacity in the South-East and they have set up a panel to be chaired by the former Chairman of the CBI to look at the future of aviation in the South-East. Dunsfold's runway is a rare asset, the same length as that proposed for Heathrow's third runway. Whilst it will never be a ‘third London airport’, it is highly competitive as an alternative for all sorts of aviation activities. Clearly, Dunsfold Aerodrome would wish to maximise its aviation potential so as to take advantage of the opportunities evident in a growing aviation market as the economy improves but only if that is the direction WBC policy takes us. It is

not our preferred option but we will not shrink from seizing the opportunity if there is not a suitable alternative.

247. What is of real concern to us is that there are those who perceive this as a threat, rather than the economic reality it is. DPL is a business, not a charity. We have bills to pay and employees to look after and aspire like every other business, and if the future is to be aviation then we will treat it no less seriously than any other project we have undertaken. We will be seeking to create the very best business and income stream we can from the activities that can lawfully take place at Dunsfold Aerodrome.

KEY POINTS

- **DPL remain committed to a mixed-use scheme replacing the Aerodrome, but open to discussion on scale and traffic mitigation.**
- **DPL have not entered long term aviation contracts so far since that would rule out the option of a mixed-use development, but the current discussion with NATS, for example, this make an early resolution necessary.**

The local community perspective

248. Central to this review has been not only undertaking an in depth examination of the planning history and policy developments that have bearing on the future of Dunsfold Aerodrome, and the views of the owners, but seeking an understanding of the range of views amongst the key stakeholders and in the communities most impacted by its past, present and potential future uses.
249. A great deal of evidence is contained in many of the documents reviewed. Notably, the representations from community groups and individual stakeholders made to the appeal into DPL's eco-village planning application. Also, the consultation exercises associated with the evolution of WBC's Core Strategy (and previously, to a lesser extent, the SEP).
250. However, this has been updated and investigated in depth through meeting a range of key stakeholders –a number of local District and County Councillors (and some former Councillors); several local Parish Council Chairs (having offered to meet them in their own right, or their Council if they wished, some arranged meetings involving other Parish Councillors and Clerks as well); key local Council Officers (past and present) including the WBC Chief Executive and the Director of Planning, and the Chief Executive of SCC; members of the previous 'Stop Dunsfold New Town' (SDPNT) group (those met had been core activists, but as immediate neighbours of the site also reflected the experiences of residents bordering the airfield); some of those running businesses on the site; and interested community organisations, including environmentalists and business organisations. Time did not allow meetings with all the potential stakeholders but those met provided an insight into the full range of opinions and organisations.

251. Only three requests to meet me were declined – the Chairman of Dunsfold Parish Council (as did his Parish Council as a whole), the Leader of WBC, and (perhaps understandably) the portfolio holder for Planning at WBC all three of which were regrettable.
252. Many thanks to all those who were willing to spend time and be so open in their thoughts. All these insights have been central to this review and its conclusions. The purpose of this engagement was to inform the review, not to ‘pray in aid’ any observations made, so comments were all treated as in confidence unless offered on the record. This helped allow completely informal and open discussion. The following commentary is informed by these discussions as a whole, but cannot be attributed in part or in whole to any individual or local organisation.

Air traffic movements

253. Views about the current aviation impacts are moderated in some cases by the fact that the airfield has been in long-term use. In some cases the earlier BAe use was seen as ‘in the national interest’ and so more acceptable in terms of noise nuisance. There is more antipathy therefore to current aviation impacts, moderated by recognition that the amounts are relatively restricted. Inevitably the concerns about aviation are centred on noise and mostly articulated by those most impacted and their elected representatives – immediate neighbours, the closer villages, and to a lesser extent, Cranleigh residents.
254. Far the greatest concern expressed to me about future options for the Aerodrome was that air traffic might grow in number and size of aircraft, sufficient to change an occasional nuisance into a much more frequent and sizable one. Surprisingly in this context, there was relatively little awareness of the current restrictions on aviation activity ceasing by 2018, nor the Waverley Core Strategy draft proposing support (albeit with caveats) for the continuation and expansion of activity at Dunsfold Aerodrome. Despite the WBC draft policy CS10, no organisation actually argued that growth or even retention of aviation uses was, or should be, a policy objective. There would clearly be considerable relief for many if the Aerodrome ceased to operate altogether (and the well supported Stop Dunsfold Airport campaign is explicitly campaigning for this, reflecting concern that growth in aviation use will adversely impact local residents and Cranleigh in particular).

Car days/testing

255. The noise impacts of the automotive uses (testing, training, BBC Top Gear) at the Aerodrome were frequently expressed both by immediate neighbours, and their elected representatives who had received their complaints. Cranleigh is more distant, so whilst for them air movements are the significant issue, the automotive uses are too far away to cause any nuisance. Whilst the noise monitoring equipment at the Aerodrome presents evidence that the noise limits and other restrictions are not in fact being breeched, clearly the sound of high speed cars (in particular) accelerating around the track is perceptible to those in otherwise rural situations around the Aerodrome, and are more repetitive over longer periods than the more noisy but more occasional aviation traffic. As a result, clearly it creates considerable annoyance to a number of local residents, annoyance that has been expressed strongly to local

Councillors and Council officials over time. On the other hand, some residents are supportive of some of the events in particular, and less bothered by the noise generally. This reflects the common fact that noise nuisance depends as much on the individual and the circumstances as it does on the actual noise levels governed by statutory noise nuisance rules, but the aggravation is none the less real. It should be noted that overall WBC has registered around 250 complaints over the last 10 years, but 60% of these come from four households very close to the Aerodrome.

Local access roads & the A281

256. For those residents and communities along the existing local access roads into the Aerodrome, there is understandable concern about the current traffic impacts, especially relating to freight traffic in and out of the site. There would be considerable local support for a more direct access for the Aerodrome site onto the A281, avoiding local residential units— and some felt this could be a key benefit of mixed-use development at the site or a larger scale business development of a size capable of making such a road investment viable, as well as bringing the aviation and automotive uses to an end.
257. The village of Bramley is the main ‘choke’ point on the A281 into Guildford, and the recognisable livery of Cranleigh Freight vehicles highlights the freight traffic generated to and from the business units at Dunsfold Aerodrome. Concern about the impacts of any further development at Dunsfold Aerodrome on traffic on the A281 has led Bramley District and Parish Councillors to oppose a mixed-use scheme of any sort at Dunsfold Aerodrome. There is less awareness that the WBC proposals for housing growth centred on Cranleigh and business growth at the Dunsfold Aerodrome site would also contribute to congestion on the A281. As far as I could tell, these comparative impacts have simply not been explored with most of the local stakeholders, nor possible mitigation measures other than those originally proposed in the Dunsfold Aerodrome planning application for mixed-use development. Similar issues were raised by residents of Hascombe regarding traffic between Cranleigh/Dunsfold and Godalming, albeit this is on a much lesser scale.

Local employment

258. For local businesses on site, a key reason they expressed for being there is their ties to the local community, notably the long standing employment of local staff, and the lack of suitable premises elsewhere in Waverley. However, there is strong concern that their growth is stymied by the lack of affordable housing locally for current and potential employees. Indeed, there is concern that this is becoming an increasing issue in replacing staff – the sons and daughters of existing employees moving away to find affordable homes. Similar concerns were raised by Cranleigh based businesses regarding housing unaffordability impacting local businesses ability to recruit and retain staff (eg recruit shop workers for the High Street businesses).

259. A second substantive concern for businesses on the site is the uncertainty pending long term decisions about the future of the site, which is preventing long term investment decisions. Because businesses are not certain of their long-term future there, they cannot invest long term in their premises, and some are contemplating moving away in order to achieve longer term goals or long term security.
260. A resolution to the future of Dunsfold Aerodrome is therefore regarded as urgent by the businesses there. Most of the businesses not being aviation related, there was also strong support for a mixed-use future for the site, primarily in order to address the housing issues of employees alongside the need for long-term certainty, and so create the soundest footing for long term business investment. This position was also reflected by the broader based Waverley and Surrey business and economic development interests, who are keen to see the site unlocked to address the growth needs of Surrey in a sustainable way (housing as well as business growth), and extremely concerned to avoid continuing uncertainty over the future of this very significant employment site and its potential contribution. Significantly, the Surrey Chamber of Commerce did not believe that maintaining aviation use at Dunsfold was critical to the Surrey economy, but unlocking the full potential of the site was vital. They would support a mixed use scheme, as has Cranleigh Chamber of Commerce.

Local relationships

261. Concern was expressed that the relationship between DPL and WBC had gone 'sour', (and in some cases the relationship with parts of the local community). The planning history was seen as having contributed to this, partly because of the historic belief that when BAe left the Aerodrome the planning permissions required a return to agricultural use. WBC's decision to lift this requirement - in so far as it ever existed, which given the 1951 permanent planning permission was not in fact the case - was successfully contested by some local residents at the High Court, but that success was overturned by the Appeal Court in 2001. This has observably left some bitterness that any kind of nuisance caused by the airfield remains there at all, legal or not. Also, WBC and DPL have been at loggerheads over recent years on a number of planning and enforcement issues relating to the use of the airfield, with several ending up in court battles. Certainly, whatever the rights and wrongs, there is an urgent need for WBC and DPL to rebuild a more positive relationship setting aside any prior history, in order to ensure the best possible future for the site and the surrounding communities, and this process does already appear to be underway.

The eco-village proposal

262. The concerns expressed by those stakeholders opposed to the earlier eco-village proposal largely centred on three elements: First, its **scale**: unbalancing the local communities, visually intrusive, and congesting the A281. Second, **cynicism**: about the commitment to and deliverability of the key very high grade offers around sustainability (doubting the viability and commitment to the public transport measures, open spaces in perpetuity, etc). Third, a sense that a '**gated community**' had been proposed: separated emotionally and physically from the established communities, with the public services and open spaces in practice (and some thought literally) barred to those not living on site. Some of this related to misunderstandings about the car cordon scheme in particular, some to misunderstanding the perceived

style and ethos of an 'eco-community', but these perceptions would need to be tackled in any future proposal.

Smaller scale mixed-use developments

263. A number pro-actively raised, or said others had raised, the possibility of a much smaller scale of housing being approved, in the 150-300 range. Generally however it was understood that this would not meet any of the sustainability criteria of the NPPF as it would be a stand alone housing estate without any services - unlikely to generate the returns or scale of demand to allow any of these to be put in place (public transport, new access to the A281, school, shop, pub, leisure facilities, etc). Also, the Aerodrome would remain operational, making the viability of the housing doubtful and the benefit to the wider community minimal.
264. Best practice would suggest that to be considered sustainable at a village level it would need a mixed-use development able to offer at least a range of services including a primary school, which would require a minimum size circa 1,000-1,250 homes. It would also be able to show sufficient financial viability to provide the funds for mitigation of transport and other impacts (eg frequent public transport and possibly a park and ride on the A281 into Guildford also serving the wider community). It would also need sufficient financial return to make the permanent closure of the Aerodrome economically viable for the owners.
265. Significantly more of the stakeholders were in principle supportive of such a scaled back scheme of 1,000-1,250 homes in return for these community benefits, than supported the original eco-village scheme of 2,601 homes. Most considered it merited detailed consideration, especially as it would on the draft Core Strategy's housing figures allow WBC to avoid the proposed Greenfield developments. Only a small minority thought a 'garden village of around 1,000 homes' should be ruled out in principle. Generally there was much less antipathy (or none) to this scale of housing development linked to a new primary school, local convenience type shop(s) and other services with an improved but not significantly enlarged employment element, than the originally proposed scale eco-village – especially if it ended the nuisance of various airfield related activities.

Expanding the existing business activities

266. Waverley's draft Core Strategy says: *"The site represents an opportunity for employment development, intensification and expansion of activity to support the economic needs of the Borough."* Discussing this with stakeholders, many (but not all) expressed concern that there was a high risk that the WBC policy would achieve the worst of all worlds: continuation and increase in the kinds of activity that are felt to be particularly unneighbourly at Dunsfold Aerodrome (aviation and automotive uses), whilst Greenfield development is forced onto communities at Farnham and Cranleigh, with the net result being the least sustainable development outcome overall.

KEY POINTS 8

- There is considerable support for ending aviation use at Dunsfold Aerodrome (and little opposition to ending it, if any).
- Close residents tend to see vehicle testing as an even greater nuisance than aviation at present.
- A new access onto the A 281 is highly desirable for those residents living on the access roads
- The main concern about a mixed-use development remains that it should not significantly impact congestion on the A281.
- There is considerable potential support for a mixed-use scheme of the right scale and design to allow closure of the Aerodrome, subject to the traffic issues.
- A clear majority (but not all) felt there was merit in exploring in more detail, before the Core Strategy process is completed, a 'garden village' at the Dunsfold Aerodrome site, but a general preference for a scheme of circa 1,000-1,250 (as an alternative to WBC's Greenfield strategy for meeting its housing shortfall), rather than a renewed proposal on the original scale.

PART 3

OPTIONS ANALYSIS

The Dunsfold Park 2008 scheme

267. The proposers said they set out to achieve a genuinely exemplary proposal, at the cutting edge of sustainable development both in the UK and in Europe, and in almost all respects that is what the Inspector and the Secretary of State accepted they had put forward. Indeed, so good was it as an exemplar in environmental terms that Friends of the Earth UK took the entirely unprecedented decision to explicitly give it their support.
268. So why did it fail? Simply put for two reasons – location and timing.
- i The scheme would almost certainly not have failed at appeal had the transport linkages been better or easily upgradable. In all other respects the scheme was regarded as an exemplary example of sustainable development. As it was, however, these transport issues meant the location was described as inherently unsustainable. However, the appeal outcome equally makes it clear that this did not mean that this scheme should never go ahead. Whilst the phrase ‘an inherently unsustainable location’ might suggest this, it is clear in both the Inspector’s report and the Secretary of State’s comments that they accepted that the proposal could still prove more sustainable than any alternative way to address the housing and other needs of the Waverley Borough.
 - ii This brings us to the issue of timing: The Inspector made it clear that he believed the scheme might nonetheless prove the most sustainable way to meet the housing needs of the Borough. Such a balancing decision could only be reached by assessing the proposal against the alternatives through the process of drawing up the local plan, which WBC was midway through developing. Hence the proposal was deemed ‘premature’.
269. Since the appeal, matters have moved on both nationally and locally:
- i The Government has announced it intends to abolish the regional strategies – but legal challenges have delayed this, despite the replacement of previous planning policy statements with the new National Planning Policy Framework (NPPF).
 - ii The introduction of the NPPF introduced a presumption in favour of sustainable development, a requirement to meet evidenced housing need, a requirement to consider stand alone ‘garden city’ type developments as a possible way to meet local housing need, a requirement to prioritise ‘brownfield’ development over Greenfield development, and a requirement not to turn down development proposals purely on transportation grounds unless they cause ‘severe’ impacts.

- iii The planning status of Dunsfold Aerodrome is now accepted to include permanent planning permission for aviation uses (the “erection, repair and flight testing of aircraft”, unrestricted in terms of flight numbers, times and associated road traffic movements, which will apply no later than 2018), and the site to be almost entirely previously developed (‘brownfield’) land. Neither was believed to be the case when the SEP Panel rejected the suggestion of a 2,500 - 2,600 home mixed-use development at the site, nor when WBC rejected the application.
- iv WBC’s Draft Core Strategy requires substantial Greenfield releases because WBC rejects the option of housing on the previously developed (‘brownfield’) Dunsfold Aerodrome site. These Greenfield releases relate to WBC having to find space for around 1,000 homes more than it could accommodate on other identified sites. Yet the NPPF says ***“Allocations of land for development should prefer land of lesser environmental value”,*** and that they should ***“encourage the effective use of land by reusing land that has been previously developed (‘brownfield’ land), provided that it is not of high environmental value”.***
- v WBC’s Core Strategy proposes, even with Greenfield releases, just 230 homes pa compared to the SEP requirement of 250 pa and the evidenced need (in the Strategic Housing Market Assessment) of 710 pa. Yet the NPPF requires 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, including identifying key sites which are critical to the delivery of the housing strategy over the plan period”***
- vi The ‘urban renaissance’ model which the SEP adopts, centring development on larger urban centres with a full range of services is in a number of respects no longer best practice. In particular, it is now accepted that edge of town developments are not necessarily well connected to the services in the town and can drive up car use and congestion, whilst new communities may provide a better option. Consideration of such alternatives is required by the NPPF: ***“The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development”.***
- vii It is now accepted that in many areas road congestion is an unavoidable element of economic growth and necessary development, and may need to be managed rather than avoided. Hence the NPPF states ***“Development should only be prevented or refused on transport grounds where the impacts of development are severe”.***

The case for an updated scheme based on the 2008 planning application

270. On all these grounds, there is a very strong case for representing a development scheme for the Aerodrome based on that submitted in 2008, but updated to address garden city design principles, and the possibility of better relieving traffic impacts on the A281 through either a park and ride bus scheme catering to Cranleigh and Horsham-Guildford traffic as well as the new development, in order to relieve congestion at Bramley in particular, or offering a contribution to the ATOC proposal of reopening the Guildford-Cranleigh rail line.
271. As things stand, this is most likely to gain traction with WBC if the EiP Inspector requires a substantial revision upwards of Waverley's housing numbers (though it could none the less be presented under the presumption in favour of sustainable development if the Core Strategy fails to succeed by spring 2013, or in relation to the proposed WBC housing projection being in any event a *minimum*, not a maximum).
272. In considering the possibility of approval being won (most likely on appeal given WBC's history of opposition to such a development, or by force majeure if WBC's housing figure is significantly revised upwards), it is relevant to summarise the likelihood of the proposed WBC housing figure changing:
273. Taking all the above factors into account regarding changed policy and particularly the NPPF, as well as the many more detailed points considered in the review as a whole, it is very possible that the EiP into WBC's Core Strategy will require an increased housing provision in Waverley. This may be in terms of the evidenced need as required by the NPPF, or at least the original SEP figure. In any event, any housing number below the SHMA evidenced housing need likely to be described as a minimum. It may also be subject to an early review, based on the outcome of many of the post NPPF Local Plan decisions so far having required such an early review in order to be approved.
274. That said, because the Regional Strategies have not yet been abolished, the WBC draft Core Strategy has been drawn up with both the SEP and the NPPF in place. It is possible that whilst the regional plan remains legally in place, South East local authorities like WBC will succeed in defending Core Strategies tied to delivering no more than the SEP figures, albeit far below their own SHMA evidence of need. This contradiction between the NPPF requirements and the still in place regional policy requirements is why in several recent Core Strategy decisions Inspectors have required an early review of the evidence of housing need when approving plans based on the former regional housing numbers.
275. If the Inspector requires a substantive increase in Waverley's housing numbers, or requires an early review to address the evidenced housing needs, the case for revisiting the proposal for a mixed-use development at Dunsfold Aerodrome on the original scale or similar will be extremely strong. There is no obvious better location to accommodate increased housing delivery; especially given WBC already has to resort to Greenfield releases.

276. As the appeal Inspector and the Secretary of State concluded, this may well be more sustainable than any other means to deliver the housing need in Waverley, and the more homes the Inspector eventually presses WBC to provide against its evidenced needs, the stronger the case for WBC to re-examine their opposition to housing on this site would be. There is clearly identifiable evidenced housing need and demand in Waverley more than sufficient to support 2,601 homes at Dunsfold Aerodrome over the period to 2026, and the site is more than large enough. If the Inspector lifts the housing numbers required, there is a very strong case for delivering these at Dunsfold Aerodrome.
277. All this said, in my view there are further key considerations that might influence changes to the scheme if it were to be reconsidered either through the remaining Core Strategy process (which at present rule it out, as I shall discuss later), or through a new application and possible appeal.
- i The **transport** package was comprehensive and cutting edge. However, it was primarily focused on mitigating the likely travel patterns of the new residents. Comparatively little was addressed as to how the scheme might provide the opportunity to deliver a package of transport measures to relieve existing and anticipated travel movements, notably on the A281. Dunsfold Aerodrome sits within a pattern of existing communities currently poorly served by public transport. By extending the 'urban quality' highly sustainable public transport offer across these communities, and targeting the existing A281 traffic, real benefits could be delivered (including to Bramley).
 - a The proposed very frequent and high quality bus services in to Guildford and Cranleigh could be extended across the villages around Dunsfold and on the A281 into Guildford. Subsidised by the new development, these services could provide a very attractive offer to a great many existing local residents compared to the cost of car use, especially given the costs of parking in Guildford. This thought was included in the original proposal, but not developed in any depth into a convincing package.
 - b This could be taken much further by addressing the increasing Horsham /Cranleigh to Guildford traffic on the A281, which is set to create increasing congestion on the A281 into Guildford in any event. A mixed-use development could fund **an exemplary Park and Ride** scheme offering high frequency, high quality and low cost travel into Guildford, saving the cost of Guildford parking. Surrey County Council Officers told me their strategy to mitigate the severe Guildford congestion issues is to look to park and ride on all the main routes into Guildford. Whilst further out than most park and ride schemes, one at Dunsfold Aerodrome, on the A281 and subsidised by the development, creates the possibility of a very attractive commuter offer, combining high frequency and low cost. Crucially, this would be the only opportunity to address the increasing peak time congestion issues in Bramley, as any other scheme would almost certainly be located on the Guildford side of Bramley. With no other mitigation on the cards for Bramley, traffic congestion is certain to increase on the A281 irrespective of the any

development at Dunsfold Aerodrome. Indeed, the WBC Core Strategy proposes 836 new homes in Cranleigh in preference to development at Dunsfold Aerodrome, which will substantially impact the A281 and will not offer the mitigation opportunities that a single Dunsfold Aerodrome development could fund.

- ii The **design** was pulled together very carefully and used the best practices at the time – indeed, it was cutting edge. However time has moved on. In a number of respects it could be brought up-to-date. This includes such issues as how climate change is addressed in terms of energy generation and heating, waste disposal, and indeed innovative transport technology such as real time public transport information on mobiles. But most importantly the understanding of what creates a well integrated and self contained community, and how to make it attractive to live and work in, has continued to evolve. The NPPF embraces **Garden City design principles** (which were based originally as it happens on the Surrey vernacular, and is often described as exactly the kind of places people aspire to live in). The design and layout of the proposals should be redrawn in these terms, irrespective of the scale.
- iii **Business growth:** On best practice principles the aim of one job per home would be achievable through a scale of employment that builds on but does not overwhelm the existing enterprises that wished to continue to operate there. Overtime I would expect the employment to additionally build around the services the community itself uses – from shop workers to plumbers. This local employment would be greatly enabled by a substantial number of affordable homes linked, as originally envisaged, to those living or working in the community or intending to do so, similar to those generally used for exception site rural housing. Additionally, over time the creation of high quality eco business spaces (including start up hub, home office space, and larger premises), purpose built to attract environmentally conscious businesses, could transform the business offer into **an exemplar eco-business park**. The concept is that a cutting edge sustainable community attracts professionals and business people who aspire to create and work in cutting edge sustainable businesses, and that enabling the two aspirations within one community encourages and enables people to live and work within the same community.

The case for a ‘garden village’ of 1,000 - 1,250 homes and 1,000 jobs

- 278. WBC may yet succeed in establishing a Core Strategy predicated on housing delivery of 230-250 pa. Even then, there remains a compelling case that WBC should review its Spatial Strategy, to replace Greenfield development with a mixed-use development at Dunsfold Aerodrome delivering (instead of on Greenfield sites as proposed) around 1,000 homes in a smaller mixed-use ‘garden village’ scheme at Dunsfold Aerodrome.

279. In my view this would far better comply with the requirements of the NPPF compared with the current proposed strategy, achieving the most sustainable pattern of development for the Borough, avoiding Greenfield developments around Cranleigh and Farnham, and resolving once and for all the community concerns regarding the aviation and automotive noise and disturbance issues affecting communities around Dunsfold Aerodrome.
280. This smaller scale of development would contribute significantly less traffic impacts than the original larger scheme (assuming broadly the same traffic mitigation measures can be sustained, and there is additionally the possibility of a park and ride serving the wider traffic into Guildford or even the railway line reopening ATOC propose). In any event, around 1,000 homes at Dunsfold Aerodrome associated with closure of the Aerodrome will very likely involve less traffic impact than the combined effects of Greenfield development at Cranleigh and Farnham and the growth of businesses at Dunsfold Aerodrome proposed in policy CS10.
281. But this scale of development is also the minimum needed to create a genuine integrated new community, albeit a well serviced village rather than an entirely self sustaining new town. To create a viable integrated community requires at least a good sized convenience store and ideally other shops or a larger store, a primary school, health centre, pub, community hall, and cafe/meeting place. The bottom line is that to achieve a primary school requires around 1,000-1,250 homes. It would be possible to integrate this scale of development into the wider community and the environment sensitively using garden city design principles and design ethos, and whilst commercial viability would need to be assessed in detail around issues like the proportion and type of affordable housing, and the crucial delivery of the transport mitigation measures, I understand that in principle and subject to market conditions, it could be viable for DPL.
282. In contrast, the idea some proposed to me of reducing the scale of the development into the low hundreds would please some of those opposed to the original development – but would render the range of services and public transport unviable, the development unsustainable on any reasonable test, and fail to justify financially the Aerodrome closure.
283. For all these reasons, if the SEP housing requirement is the baseline accepted at EiP by the Inspector, recasting the proposed WBC spacial strategy to reduce impacts on Farnham and Cranleigh and the Greenfield development by delivering a ‘garden village’ of around 1,000-1,250 homes at Dunsfold Aerodrome is a package addressing the conflicting requirements of Waverley and the local communities in the context of the NPPF and the now accepted planning status of the Aerodrome.

The alternative to a mixed development is a renewed focus on aviation

284. Whilst the remaining WBC local plan process and the recently established SIG still provide an opportunity to achieve a different long term strategy, at present the draft Core Strategy policy CS10 says little more than ‘more of the same’.

285. I believe that it is clear that short of housing related development through a mixed-use scheme, the most likely best economic option for DPL is to build on the unique asset they have in the shape of relatively unrestricted aviation related uses. They have a strong USP in the shape of the relative rarity of a 2km surfaced runway complex with plenty of previously developed land for development (much of which would be permitted development out of the control of WBC). In other words, unless the Aerodrome is closed to allow a mixed-use development to take place, it will likely be developed over time based on these aviation permissions plus ad hoc business investments. Whether or not DPL wishes to do this given their preference for an exemplary eco-development, if mixed-use development is ruled out, I have no doubt this is the basis on which the business value of the site could be best realised.
286. Unless there is agreement between the site owners and the local planning authority on a viable alternative comprehensive strategy (or DPL wins support for such at the EiP into the Core Strategy or on appeal against a new revised application), this is the future for Dunsfold Aerodrome. And this opinion is reinforced by the appeal Inspector's report. He dealt then with the question of what would happen were the eco-village proposals not given permission:
287. **"If the appeal proposals do not go ahead the status quo will be maintained. The Council has said that it is in favour of continuing the present situation. Aviation activity is currently at a relatively low level, with the number of flights being well below the 5,000 annual limit. The Appellants have explained that this is due not to a lack of opportunity – they have drawn attention to expressions of interest from a range of prospective tenants – but to their own reluctance to agree to long term tenancies pending the outcome of the appeal.**
288. **"The extent to which the existing use conveys PD rights on the Appellants is a matter of dispute. However, given the general policy backing for aviation use and in the absence of any specific proposals it is idle to speculate on what additional development might or might not be allowed. What is clear is that there is scope for a considerable intensification of the existing use without the need for further development.**
289. Having had regard to the Inspector's comments about the fall-back position, the Secretary of State agreed that there is scope for a considerable intensification of the existing use of the site without the need for further development. The Secretary of State also agreed with the Inspector that the operational part of the Aerodrome, including the runways and interstitial grassed areas, is previously developed land.
290. Since then the case for aviation development has been substantially increased by the establishment of the baseline planning position being the unrestricted 1951 planning permission. Plus WBC's own draft Core Strategy sustainability appraisal (by URS) casts doubt on the Council's position that it can assert control over aviation to control associated noise and disturbance as policy CS10 implies. Nor is Dunsfold Aerodrome's proximity to London Gatwick the constraint on Dunsfold Aerodrome WBC and their consultants have suggested.

291. The NPPF makes the ability of WBC to control the development of aviation use at Dunsfold Aerodrome even more constrained by stating **“When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation”**. Taken together, all these factors mean it is very difficult for WBC to resist the growth of aviation at the Aerodrome unless it is closed to allow a mixed-use redevelopment. And DPL show convincing evidence of the potential aviation demand.
292. It is true that, as yet, there has not been a great deal of escalation of aviation use, but it is clear that this is primarily because to achieve this DPL would have to accept that no mixed-use development would be agreed, a position they have not yet reached. If they conclude that their plans for a mixed-use development cannot be realistically pursued, clearly they will be able to agree the long term contracts that aviation investments will require.
293. It is possible, but not certain, that the conclusion of the Waverley Core Strategy will, if it continues to oppose a mixed-use future for the site, bring DPL to that point. Then the appetite for developing the airfield will begin to be tested, as will the limited ability of WBC to exercise any restraint or control on it. Or the uncertainty might drag on, if DPL invest in a new application updated to meet the terms of the NPPF, in the hope that it might be approved on appeal – especially if revised to meet the previous difficulties (eg a smaller scheme with enhanced transport impact mitigation measures). Either way, the ‘nuisance issues’ for local residents of the aviation and automotive use of the site will not go away, and will likely get worse, and the potential for the site to meet the sustainable development needs of Waverley and Surrey in one form or another will not be realised to their full potential so long as its future remains ‘on hold’.

Conclusion

294. Waverley Borough Council’s current draft Core Strategy proposals involve a lose-lose scenario: Greenfield developments around Farnham and Cranleigh, plus likely growth of aviation use of the Aerodrome which the Council would have little or no power to control. A well-planned garden village would, in contrast, provide a win-win-win for the community: a permanent end to the aviation and automotive noise and nuisance issues; an exemplar garden-village mixed use development which actually enhances the landscape, public realm and biodiversity rather than edge of town Greenfield developments; and a clearly deliverable (and therefore defensible) housing strategy meeting pressing and evidenced housing needs in Waverley. As the Inspector for the 2008 appeal suggested it might, I believe that a proper assessment of the net sustainability of this development compared to the draft Waverley Core Strategy could prove to be the best and most sustainable solution for meeting the housing requirement, the requirements of the NPPF, and most importantly to deliver the homes, jobs and facilities so many local people desperately need.

Appendix 1

Agreement between Dunsfold Park Ltd & Lord (Matthew) Taylor

Terms of reference

The engagement is to produce an independent report to Dunsfold Park Ltd, examining the alternatives that may be open for the company re the future use and development of the Aerodrome site. In particular, taking the appeal Inspector's report as a starting point and in the context of the NPPF and the draft Local Plan, examine the likelihood of progressing an integrated development (and if so, with what scale and key design elements, and with what mitigations, to address the objective of high quality sustainable development to meet local needs (whilst meeting local needs) and the requirements of the NPPF); and secondly if this option is not available what alternative (including commercial) development of the Aerodrome may be possible.

Approach

In addition to reviewing relevant local and national policy and proposals, Lord Taylor will seek to engage the community, Councils and interested parties in reaching his understanding of the difficult choices facing the community regarding the future of the Aerodrome site, so that he is as informed as possible of the cross section of opinions locally and the options that might be considered to enable him to recommend measures that may assist in meeting local concerns regarding any development proposed.

In drawing up this report, Lord Taylor will in particular:

Review the draft Local Plan and its likelihood of approval by the Secretary of State. In particular, the proposals in relation to meeting housing needs and economic growth in Waverley (and resulting transport impacts), in the light of the SHMA, and the duty to cooperate, etc. Advise on how far the draft is likely to meet the requirements of the NPPF and so it is likely chances of being approved by the Inspector/Secretary of State. Advise how far the proposed Greenfield developments have been appropriately assessed in their impacts, compared to the alternative of integrated development at Dunsfold Park.

Review the plans for development previously proposed by Dunsfold Park Ltd, to consider: a) the quality of the proposals for sustainable integrated development; b) how these might be improved in the light of current best practice/the NPPF; or c) how they (amended or otherwise) might offer a better alternative to the proposals set out in the draft Local Plan to meet housing needs/economic development, in particular with regard to:

- addressing the scale of housing need (affordable and open market)
- impact on transport c/w alternative options
- addressing economic growth needs

Review the opportunities for growing the commercial Aerodrome and related business in the event of mixed-use development not being supported, and the comparative environmental and other impacts c/w an integrated mixed-use development. In particular, to assess the opportunities/impacts in the light of the latest rulings re the planning position re the Aerodrome, looking both at the commercial options but also the impacts on local residents and communities.

Assess (through interview, meetings, and survey) the views of key stakeholders to the alternatives explored above.

Stake holders likely to include:

- Parish/Town Council Chairs most affected
- Local Chambers of Commerce
- Key employers
- Local housing related groups
- Opposition groups to development (as Aerodrome and/or integrated development)
- District Council - planning officer, chief exec, key portfolio holder(s), local Councillors
- County Council – key officers/portfolio holder/local Councillors

Lord Taylor will complete the written report by the end of August and submit it to Dunsfold Park Ltd, setting out the options he believes the community and the company has for the future of the Aerodrome site and recommending a way forward for the company.

Appendix 2

Consultees and Community engagement:

Derek Ames – Dunsfold Airport Action Group

John Bannister - Chairman of Guildford Environmental Forum

Peter Barker - Dunsfold resident & Member of Stop Dunsfold Park New Town

Cllr Maurice Byham - Waverley Borough Councillor for Bramley, Busbridge & Hascombe; Member of Eastern Area Planning Committee & Joint Planning Committee

Cllr Carole Cockburn - Farnham Town Councillor, Waverley Borough Councillor for Farnham Bourne & Member of Western Area Planning Committee

Sue Doughty - Former Liberal Democrat MP for the Guildford Constituency

Cllr Brian Ellis - Chairman of Cranleigh Parish Council & Waverley Borough Councillor for Cranleigh West. Chairman of Joint and Eastern and Central area planning Committees

Cllr Patricia Ellis - Waverley Borough Councillor for Cranleigh West, Member of Eastern Area Planning Committee & Joint Planning Committee, Cranleigh Parish Councillor

Dr Hugh Ellis - Chief Planner of Town & Country Planning Association (TCPA), formerly Senior Planner at Friends of the Earth England, Wales and Northern Ireland

Matthew Evans - Head of Planning Services at Waverley Borough Council

Julie Fisher – Strategic Director: Change & Efficiency, Surrey County Council

Cllr Mary Foryszewski - Waverley Borough Councillor for Alfold, Cranleigh Rural & Ellens Green, Member of Eastern Area Planning Committee & Joint Planning Committee, Cranleigh Parish Councillor

Cllr Richard Gates - Waverley Borough Councillor for Bramley, Busbridge & Hascombe; Mayor of Waverley 2011/12, Member of Eastern Area Planning Committee & Joint Planning Committee

Kate Grant - DP tenant (Founder & Head Teacher of Jigsaw Independent Day School for Children with Autism Spectrum Disorders which is based at Dunsfold Park)

Frank Gray - Cranleigh resident and founder of Dunsfold Airport Action Group

Cllr Nick Holder - Waverley Borough Councillor for Chiddingfold & Dunsfold, Vice Chairman of Community Overview & Scrutiny Committee, & Member of Southern Area Planning Committee

Claire Howell - Dunsfold resident & Member of Stop Dunsfold Park New Town

Cllr Diane James - Independent Waverley Borough Councillor for Ewhurst

David January - Former Director of Housing at Waverley Borough Council

Iain Lynch - Clerk to Farnham Town Council

Cllr Dr Jenny Masding - Chairman of Alfold Parish Council

Peter Maudsley - Former Director of Environmental Services at Waverley Borough Council

David McNulty - Chief Executive of Surrey County Council

Ken Mitchell – Dunsfold Airport Action Group

Kay Newnham - Alfold resident, former Alfold Independent Parish Councillor, and former journalist Surrey Advertiser.

Mike Newnham - Alfold resident, chairman of Cranleigh Village Hospital Trust

Cllr Sue O'Connell - Chairman of Bramley Parish Council

Cllr Charles Orange - Chairman of Hascombe Parish Council

Mary Orton - Chief Executive of Waverley Borough Council

Mark Pearson - Chief Executive, Surrey Connects Enterprise Partnership

Cllr Dr Andrew Povey - Surrey County Councillor for Waverley Eastern Villages

Cllr Ruth Reed – Parish Councillor for Cranleigh East

Cllr Ken Reed – Parish Councillor for Cranleigh and former Waverley Borough Councillor

Iain Reeve - Assistant Director of Strategy: Transport and Planning, Surrey County Council

John & Celia Savage - Former Waverley Borough Councillors for Cranleigh East

Cllr Richard Seabourne - Parish Councillor for Bramley

Kathy & Mike Smyth – Retired solicitors and current members of Friends of the Earth (Guildford & Waverley).

Carol Squires - Surrey Chamber of Commerce

Stephen Thwaites - Former Head of Planning at Waverley Borough Council

Beverley Weddell - Hascombe Parish Council clerk

David Wells – Dunsfold Park tenant (Managing Director of Cranleigh Freight Services based at Dunsfold Park)

Alan Young - Surrey County Councillor for Cranleigh & Ewhurst

Becky Young – Cranleigh Freight Services

Those who declined to meet:

Robert Knowles - Conservative Leader of Waverley Borough Council & Councillor for Haslemere East & Grayswood.

Bryn Morgan - Portfolio Holder for Planning & Climate Change and Councillor for Elstead & Thursley

Alan Ground - Chairman of Dunsfold Parish Council and his Parish Council.

Appendix 3

Glossary of Terms

Affordable Housing (or sub-market housing)	Housing, whether for rent, shared ownership or outright purchase, provided at a cost considered affordable in relation to incomes that are average or below average, or in relation to the price of general market housing. Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should: <ul style="list-style-type: none"> ■ Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices. ■ Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.
Appeal	The process whereby a planning applicant can challenge an adverse decision, including a refusal of permission. Appeals can also be made against the failure of the planning authority to issue a decision within a given time, against conditions attached to permission, against the issue of an enforcement notice and against refusals of listed building and conservation area consent. In England and Wales, appeals are processed by the Planning Inspectorate.
Area of Great Landscape Value	AGLV
Area of Outstanding Natural Beauty (AONB)	An area with statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty. Together with National Parks, AONB represent the nation's finest landscapes. AONB are designated by the Natural England.
BAe	British Aerospace
Brownfield Land and Sites	Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.
Core Strategy	A Development Plan setting out the spatial vision and strategic objectives of the planning framework for an area, having regard for the community strategy.
Dunsfold Park Ltd	DPL
Examination in Public	EiP
General Permitted Development Order	GPDO
Green Belt (not to be confused with the term 'Greenfield')	A designation for land around certain cities and large built-up areas, which aims to keep this land permanently open or largely undeveloped. The purpose of the green belt is to: <ul style="list-style-type: none"> ■ check the unrestricted sprawl of large built up areas ■ prevent neighbouring towns from merging ■ safeguard the countryside from encroachment ■ preserve the setting and special character of historic towns ■ assist urban regeneration by encouraging the recycling of derelict and other urban land ■ Green belts are defined in a local planning authority's development plan.
Greenfield Land or Site	Land (or a defined site), usually farmland, that has not previously been developed.

Local Development Framework (LDF)	The Local Development Framework (LDF) is a non-statutory term used to describe a folder of documents, which includes all the local planning authority's local development documents. An LDF is comprised of: <ul style="list-style-type: none"> ■ Development Plan Documents (which form part of the statutory development plan) ■ Supplementary Planning Documents ■ the Statement of Community Involvement ■ the Local Development Scheme ■ the Annual Monitoring Report ■ any Local Development Orders or Simplified Planning Zones that may have been added.
Local Planning Authority	The local authority or council that is empowered by law to exercise planning functions. Often the local borough or district council. National Parks and the Broads authority are also considered to be local planning authorities. County councils are the authority for waste and minerals matters.
Market housing	Private housing for rent or for sale, where the price is set in the open market.
Master Plan	A type of planning brief outlining the preferred usage of land and the overall approach to the layout of a developer. To provide detailed guidance for subsequent planning applications.
National Planning Policy Framework	NPPF
SEP	South East Plan
Strategic Housing Market Assessment	SHMA
Surrey County Council	SCC
Sustainability Appraisal (including Environmental Appraisal)	An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.
Waverley Borough Council	WBC

This Glossary is largely based on the glossary of planning terms on the Planning Portal <http://www.planningportal.gov.uk>

Disclaimer:

The Glossary is neither a statement of law nor an interpretation of the law, and its status is only an introductory guide to planning issues and should not be used as a source for statutory definitions.

