



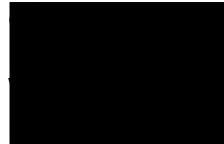
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Our Ref: 058/18/JJ

16 June 2022

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Banks Solutions



**LAND AT WILDWOOD LIVERY STABLES HOOK STREET ALFOLD RH12 3GG  
LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT  
POLICIES PRE-SUBMISSION DOCUMENT (NOVEMBER 2020) - Examination in Public  
July 2022**

D&M Planning Limited has been instructed by J Pearson to submit representations to the Waverley Borough Council in connection with the inclusion of the above site (see submitted Location Plan attached as **Appendix 1**) within the Settlement Boundary / taken out of the Metropolitan Green Belt and its development for new housing.

Our representations should be read in association with those previously submitted under the auspices of the *Local Plan Part 2: Site Allocations and Development Management Policies Pre-Submission Document (November 2020)*. As these have already been submitted to Waverley Borough, we have not included these here as the Council has confirmed that all representations made will be put before the Inspector appointed to reside over during the Local Plan Part 2 assessment process.

With specific regard to the Examination of the Waverley Local Plan Part 2, the matters, as set out within the Inspector's Matters, Issues and Questions document are set out below, which relate to the above site being considered suitable, in principle, for future development, are as follows:

#### Matter 4: Settlement Boundaries and Development in Rural Areas

The Inspector's specific questions are noted, but in the interest of brevity and to avoid repetition, we have provided commentary to address the questions which are pertinent as the above matters are entwined and in assessing suitable sites are not mutually exclusive.

Having monitored and assessed recent appeal decisions and gone through Governmental and Waverley's planning policy and other relevant documentation, it would seem that Waverley continues to fail to achieve its housing requirement.

*Inter alia*, paragraph 74 of the NPPF says:

*Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies...*

The housing requirements set out in the adopted Local Plan: Part 1 2018 represents a significant increase over the initial Submission Local Plan: Part 1 (519 dwellings per year) and the previously adopted Local Plan 2002.

Having regard to the latest Housing Land Supply position (with a stated supply of 5.2 years as of April 2021) the Council claims it is able to meet its requirements under the NPPF. However, the appointed Inspector who oversaw a recent inquiry for a

development at Land west of Loxwood Road, Alfold (decision attached at Appendix 2), at paragraph 89, states:

*Although the Council maintains there is a 5.22 year supply, in my view, there is a housing land supply equivalent to 4.01 years.*

Inspector's emphasis

Another recent appeal decision for development of land off Scotland Lane, Haslemere (also attached at Appendix 2), at paragraph g 89 says:

*...I conclude that the Council can demonstrate a supply of deliverable housing land of around 4.25 years.*

Within an appeal decision dated 25 February 2022, land south of Alfold Garden Centre, Horsham Road, Alfold Crossways, the Inspector, at paragraph 51 said:

*I therefore find that the Council can demonstrate a 4.01 supply of deliverable sites against the requirement for a 5-year supply of deliverable sites set out in the Framework*

This appeal decision is also attached at Appendix 2.

Unfortunately, Waverley has historically failed to provide an adequate housing provision, as the below table demonstrates.

Year	Local Plan Requirement	Housing Completions	Cumulative Shortfall
2013/2014	590	143	- 447
2014/2015	590	242	- 795

2015/2016	590	342	- 1,043
2016/2017	590	321	- 1,312
2017/2018	590	512	- 1,390
2018/2019	590	346	- 1,634
2019/2020	590	380	- 1,844

Source: Waverley Five Year Housing Land Supply Position Statement as of 01 April 2020

A further point to add is that doubts remain over future of the Dunsfold Aerodrome site coming forward.

The latest news on the Council's website states:

*Statement issued at Full Council meeting on 20 April 2021:*

*Dunsfold Airport Ltd has informed Waverley Borough Council that there will be changes to land ownership at Dunsfold Park and that Trinity College expects to undertake a process to pass its investment to a new land owner over the next 12 months. As the site is so significant for the local area and for the borough, the council has offered to assist in the smooth transition and has provided information to Trinity on the importance of development at the Park. We are interested in exploring with them all of the options for the future ownership of the Park and how an exemplary sustainable development will be delivered on the timescales of the existing planning permission. This is a very significant step and an opportunity to ensure that the Park achieves our high ambitions in the context of post-Covid recovery. We look forward to engaging closely with Trinity College's transition team in the coming weeks and months.*

At the time of writing, it is understood that new owners have yet to be found and with new owners it is highly probable that a new planning application would be submitted. As such, significant delays in development coming forward at this site has to be likely.

Another matter to consider, which is also concerned with the deliverability of the Dunsfold Aerodrome site, is the recent permission given to UK Oil and Gas (UKOG) at the Loxley site in Dunsfold (link to the application below).

<https://planning360.waverley.gov.uk:4443/planning/search-applications?civica.query.FullTextSearch=oil%20and%20h%3Dgas#VIEW?RefType=GFPlanning&KeyNo=357149&KeyText=Subject>

Whilst the drill site itself is relatively small, the directional drilling enables a search area to extend up to 1 kilometre beyond the footprint of the below ground gas discovery. This is demonstrated by the UKOG Petroleum Exploration Development Licence Area 234 plan (attached as Figure 2 of UKOG's document entitled Loxley Well Site Hydrocarbon Exploration Testing and Appraisal Site Identification Report) which is attached as **Appendix 3**. As can be seen the area of research as extends as far as and encompasses Dunsfold Aerodrome.

The point of referring the Inspector to the UKOG application is that anyone looking to purchase the Aerodrome site will be aware that a potential homeowner could well be put-off purchasing a property in the knowledge that oil and gas exploration has been taking place beneath the site and thus 'blighting' it.

Thus, it cannot be taken for granted that Dunsfold Aerodrome site will deliver any new homes.

As set out in previous representations, policy ALH1 (the Amount and Location of Housing) of the Local Plan Part 1 sets out that the minimum requirement for housing within Alfold is 125 new dwellings.

Although Alfold has been identified as a settlement capable of accommodating new development, the principle of residential development for a smaller scheme has already been acknowledged as acceptable in the following form as follows:

- i. The planning inspector at a dismissed appeal (3252976) at this site, at paragraph 20, the Inspector states ...there would be scope to create a more informal style of development...
- ii. The refused decision notice for planning application at this site (WA/2019/1075) shows the first reason for refusal was specifically due to the number of units. The proposed development by reason of the number of dwellings in this location...
- iii. The site was placed onto the Brownfield register on 12 December 2018 having been established as suitable for residential development, available and achievable. However, is noted that the register has deemed the site as suitable for only five units and not seven as detailed in the original hybrid application.
- iv. An email from the Council dated 02 February 2022 indicated that the revised scheme has allowed the development to be loosened and reduced to a certain extent the urbanising clusters.
- v. Planning application WA/2021/0109 - change of use of the barn to a dwellinghouse and associated works has been granted planning permission and Planning Inspector in assessing appeal 3252976 identified that residential development is acceptable at this site.

Links to the Council's website to view the applications are below.

<http://planning360.waverley.gov.uk/planning/search-applications?civica.query.FullTextSearch=wa%2F2019%2F1075#VIEW?RefType=GFPlanning&KeyNo=357676&KeyText=Subject>

<http://planning360.waverley.gov.uk/planning/search-applications?civica.query.FullTextSearch=wa%2F2019%2F1075#VIEW?RefType=GFPlanning&KeyNo=416272&KeyText=Subject>

A new planning application, for 4 dwellings has been submitted, but not yet validated. When the application has been validated, I will inform the Inspector.

We have nothing further to add at this stage but may wish to add further points / provide clarity at the Examination in Public which due to take place in July.

I trust this is helpful, but should you have any questions, please do not hesitate to contact me.

Yours sincerely

D&M PLANNING LIMITED

JESSE CHAPMAN

Director

Enc

Cc Mr J Pearson