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LAND AT HURST GATE PORTSMOUTH ROAD MILFORD GU8 5HH  
LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT  
POLICIES PRE-SUBMISSION DOCUMENT (NOVEMBER 2020)

D&M Planning Limited has been instructed by Mr D Thompson 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:

LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT  
POLICIES PREFERRED OPTIONS CONSULTATION 25 MAY TO 9 JULY 2018

WAVERLEY BOROUGH COUNCIL TARGETED CALL FOR SITES 2020 - LOCAL PLAN  
PART 2 (LPP2) 11 JUNE 2020 - 10 JULY 2020

LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT  
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As these have already been submitted to both Witley Parish Council and Waverley Borough Council, we have not included these here as Waverley has confirmed

that all representations made will be put before the Inspector appointed to reside over 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 3: Green Belt

Matter 6: Housing requirements and general supply matters

Matter 8: Housing Allocations - Milford and Witley

We have noted the Inspector's specific questions, 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 inter-related 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 continue 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](#).

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

Given that the Council does not have a sufficient housing land supply, and, indeed, Waverley has historically failed in its duty to meet its housing targets, it is considered that the continued lack of a suitable housing land supply constitutes very special circumstances.

This was found to be the case with a recent appeal decision, attached at **Appendix 3**, where the Inspector attached very substantial weight to the considerable housing benefits of the appeal scheme, and which include a Development Plan compliant affordable housing contribution was sufficient to outweigh the in-principle objection to new development within the Green Belt.

Furthermore, and a point that been made previously, 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 4**. 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.

With regard to the virtues of the submission site; the site has an approximate area of 1.34 hectares and is situated to the east of Milford. A copy of an Ordnance Plan, with the approximate area of the site outlined in red, is attached as **Appendix 1**.

The site is located within the Green Belt and is not subject to any specific landscape designations, such as the Surrey Hills AONB or the locally designated AGLV which lie some distance from the site.

The site lies within the Shackleford Open Greensand Hills - Surrey Landscape Character Area (GO1). This is a diverse landscape, predominantly pastoral but with areas of arable farmland, woodland, heathland, golf courses, parkland, nurseries and paddocks, and quarry workings. Field patterns are mainly medium to large regular fields with straight boundaries typical of parliamentary enclosure bounded by hedgerows with hedgerow trees or by fences.

As stated previously, although the site is located outside of the settlement boundary, its close proximity and relationship to the settlement of Milford, and the presence of the A3100, mean that the site has the 'feel' of being part of the village, as opposed to it being, technically, situated within open countryside.

The site has an existing vehicular access onto the Portsmouth Road, with good visibility, and is well screened by mature planting and trees.

It is within close proximity to many local shops, services and many other local amenities.

The site is also in close proximity to a frequent, regular bus service, and within walking distance of Milford mainline railway station.

The inclusion of the site within the Settlement Area of Milford would be logical, because of its position in relation to the Settlement Boundary and being located in such a sustainable position.

The topography of the site and surrounding land, coupled with the existing natural screening, would have the resultant effect that new development would not be readily conspicuous when being viewed from anywhere outside of the site.

The site has strong boundary definition on all sides meaning that development at the site would extend no further than its confines.

Furthermore, because of the existing screening currently in situ, this would mean that if residential development were to take place at this site, the impact upon the open countryside would be minimal.

It is submitted that, due to its size, location, appearance and condition, the site makes little contribution to the open countryside. It is therefore considered that a high quality and sympathetically designed proposal would have a positive impact upon this area of Milford.

It is important to note that the acceptability of this site coming forward can be put into the context of the adjacent Milford Golf Course, which lies immediately to the south and east of the submission site, development here has been found to be acceptable. As such, it is not unreasonable to come to the conclusion that if development at Milford Golf Course can be acceptable, then so, too, can it at the submission site.

Furthermore, with only three sites within the Parish of Witley (Witley and Milford) coming forward (namely the Secretts site, the Wheeler Street Nursery site and the Highcroft site), the Council is placing a great deal of faith that all of these sites will come forward.

Like both of these sites, we submit that:

- That development at the site can achieve a holistic and integrated scheme for the whole site that maximises connectivity and delivers the necessary infrastructure and direct access into Milford village centre.
- The sympathetic design and layout of the proposal, coupled with its scale, location and proposed landscaping would not have a detrimental impact upon the Milford Conservation Area and Grade II listed buildings.
- The proposal can be built-out whilst ensuring the protection and enhancement of existing trees, hedgerows and adjacent pond which makes an important contribution to the character of the local area;

- The proposal includes the provision of an appropriate landscape buffer including trees and hedgerows on western boundary of the site.
- Suitable, safe access and egress can be achieved for vehicles can be achieved on to and off of the A3100 Portsmouth Road.
- The proposal also includes the provision of sustainable transport measures which may include on-site and off and off-site pedestrian crossing improvements, footways and cycle ways.
- The application demonstrates that development will not have a detrimental impact upon protected habitats sites, including the provision of SANG or other mitigation measured deemed appropriate to avoid significant impact to the Wealden Heaths Special Protection Area (SPA).

Attached at **Appendix 5** is a plan showing the location of the submission site in relation to the Secretts Garden Centre site and the Milford Golf course site.

Accordingly, the Council has accepted the principle of development within the same location as the submission site as being acceptable in all planning terms.

In accordance with Central Government guidance, it is submitted that the best use should be made of the submission site, in producing a sustainable development whilst paying due regard to the character and grain of existing development within the wider area.

The submission site is also within one ownership and, as such, can come forward separately or, if preferable, as part of a more comprehensive development - namely Site 0365 as identified within the Council's Green Belt Appraisal (August 2020).

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 D Thompson