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G J Fort BA PgDip LLM MCD MRTPI  
C/O Ms Charlotte Glancy  
Banks Solutions



**LAND TO THE SOUTH OF SHOPPE HILL AND WEST OF DUNSFOLD COMMON ROAD,  
DUNSFOLD, SURREY, GU8 4LN 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 PJ Mason 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. 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 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.

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, as best-case scenario, significant delays in development coming forward at this site has to be likely.

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 PJ Mason