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LAND TO THE WEST OF WEST COTTAGE, PORTSMOUTH ROAD, MILFORD, SURREY GU8 5BD
LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PRE-SUBMISSION DOCUMENT (NOVEMBER 2020)

D&M Planning Limited has been instructed by Mousehill Limited 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 POLICIES PRE-SUBMISSION DOCUMENT (NOVEMBER 2020)

LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PRE-SUBMISSION DOCUMENT (NOVEMBER 2020)

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.

With regard to the virtues of the submission site the comments within the Council's Green Belt Appraisal (August 2020) that development of the will result in an uncharacteristic cluster as the site is well located to the settlement boundary of Milford and can accommodate new development, in-keeping with the general grain and pattern of the existing development within the vicinity.

If the possible pattern of development is a factor in assessing the suitability of a site for release from the Green Belt, a view could be taken that the Secrett's site, the Wheeler Street Nursery site and especially the Highcroft site (which have been identified within the Local Plan Part 2 as being suitable for new development) would all result in development uncharacteristic with their surroundings.

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

With regard to the Green Belt appraisal's comments that the site is characterised by considerable tree cover, whilst there some trees on the site, it is not 'considerable', and the character of the site is more akin to a residential garden curtilage.

A copy of an Ordnance Plan, with the approximate area of the site outlined in red, is attached as Appendix 1.

It is worth noting, also, that the site was provisionally allocated as being suitable for development under DS27 of the previous version of the draft Local Plan Part 2 and also by the draft Witley Neighbourhood Plan.

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.

Although the site will be able to provide a limited number of new units, it is worth noting paragraph 69 of the NPPF in that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. The submission site is 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 Moushill Limited