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Our Ref: 055/18/JJ

16 June 2022

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**TANGLEY CLOSE LITTLE TANGLEY WONERSH GU5 0PW
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 Mr N Cole-Hawkins and Mrs V R Measures 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 *WAVERLEY BOROUGH LOCAL PLAN THE SUBMISSION OF SITES 2013 / 2014*; . *THE WAVERLEY BOROUGH LOCAL PLAN PART 2 - CALL FOR SITES THE SUBMISSION OF AVAILABLE SITES FOR CONSIDERATION FOR POTENTIAL DEVELOPMENT 2017*; *WAVERLEY BOROUGH LOCAL PLAN PART*

2: *SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PREFERRED OPTIONS CONSULTATION MAY 2018*; and *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 3: Green Belt

Matter 4: Settlement Boundaries and Development in Rural Areas

Matter 6: Housing requirements and general supply matters

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

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 Womersley and Shamley Green is 30 new dwellings.

Also as set out within previous submissions, there is concern relating to the deliverability of the required housing, and specifically for Womersley, this is despite the settlement being identified as a sustainable location, suitable for new development, the boundary changes to the settlement are minimal.

To help demonstrate this, attached at Appendix 4 is a copy of a plan of Wonersh taken from the Waverley 2002 Local Plan Proposals Maps and a plan of Wonersh (Map 25) taken from the Draft Local Plan Part 2.

To reiterate, the changes proposed are considered to be minor, even *de minimis*, and in order to identify the alterations, these have been highlighted.

The boundary realignment, far from seeking to provide housing sites, is also proposed to be realigned so that areas which are currently within the settlement area, will now seem to be outside. Indeed, it is our submission that the Council has made the boundary changes as a mere gesture instead of proactively looking for possible and realistic locations for new development.

Furthermore, the Council's Land Availability Assessment (November 2020) has failed to identify any sites at either Shamley Green or Wonersh, with the submission site itself being erroneously discounted because it is suggested that it cannot deliver five or more new homes.

In looking at the proposed boundary realignment, it simply cannot be seen how any of these alterations will allow new development to take place. Even if the prevailing grain and pattern of development were to put to one side, we do not see how 'physically' new development can be accommodated.

Without meaningful boundary realignment / suitable sites taken out of the Green Belt, such as the Submission Site, development, quite plainly, will not come forward.

As way of demonstration, research of the Council's website shows that since 2015, Waverley Borough Council has granted permission for just eight new dwellings Wonersh as a whole, and of those eight, one was a certificate of lawfulness of existing use and / or development (CLEUD), two were by virtue of the conversion of a rural building, and one by virtue of a permitted development application - commercial use to - residential.

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 for suitable sites, which very much includes the Submission Site at Tangle Close, to be removed from the Green Belt.

At this stage it is worth mentioning that 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 a housing scheme to be sufficient to outweigh the in-principle objection to new development within the Green Belt.

With specific regard to landscape (the site lies within the non-statutorily designated Area of Great Landscape Value), the Submission Site is already encompassed by existing residential development (dwelling and outbuildings and associated hardstanding etc) and is set within a plot which is well screened by vegetation.

Accordingly, the site already has a domestic appearance within the village setting and any appropriate development will not be introducing, or even materially intensifying, a 'domestic' setting within a natural landscape setting.

Even if the site were in a natural landscape setting, the plot has already been 'disrupted' by the presence of built form.

Thus, the measure of impact upon the landscape within its actual setting relates to the degree of additional built form brought that will be about and what material impact this has when viewing / appreciating site from any viewpoints. This, of course, will be matter for a planning application to consider and not part of the Local Plan Part 2 assessment. However, if the Council consider that the proposed alterations to Wonersh will allow for new development to take place, then, surely, so must the Submission Site.

It has to be appreciated that the existing house and associated development represent a 'narrow' domestic plot within the 'wider landscape' setting and this is a small proportion in any larger vista, where built form already exists and, thus, the effect the site and encompassing development has upon the wider landscape, and, again, any views will not be materially altered by development.

Thus, the impact that limited additional built form at the site will have upon the wider landscape will be minimal. The site is well located to the settlement boundary of Womersh and can accommodate new development, in-keeping with the general grain and pattern of the existing development within the vicinity.

Further, the submission site can come forward as soon as required and commitment to this is evident by virtue of the submission a planning application (WA/2016/1291 - outline application for erection of five dwellings and associated works following demolition of existing dwelling) having taken place.

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 N Cole Hawkins

Mrs V R Measures