

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

PROOF OF EVIDENCE – HOUSING LAND SUPPLY & TRAJECTORY MATTERS **Volume II – EXECUTIVE SUMMARY**

Land at Scotland Park, Haslemere, Surrey

Planning Appeal Reference: APP/R3650/W/23/3327643
Planning Application Reference: WA/2022/01887

On behalf of:
Redwood (South West) Limited

Prepared by:
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Director

December 2023



Town and Country Planning Act 1990 (As Amended)

Proposed Residential Development: Redwood (South West) Limited

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Proof of Evidence

EXECUTIVE SUMMARY

Housing Land Supply & Trajectory Matters

08 December 2023

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- E1. This Proof of Evidence on Housing Land Supply Matters considers whether Waverley Borough Council ("**the Council**") is able to demonstrate a 5-year supply of deliverable housing sites in accordance with the requirements of the National Planning Policy Framework 2023 ("**the Framework 2023**") and in particular Paragraph 74 (Part I of my Proof of Evidence). Annex 2 of the Framework 2023 sets out the definition of what constitutes a deliverable site for the purposes of Paragraph 74 and this is supplemented by the Housing Supply and Delivery section of the National Planning Practice Guidance ("**PPG**").
- E2. The Council's current housing land supply position is set out in its Housing Land Supply Position Statement published on 01 October 2023 and uses a base date of 01 April 2023. It is a matter of common ground between the Appellant and the Council that it cannot demonstrate a 5-year Housing Land Supply. The dispute relates to the extent of the shortfall.
- E3. Part II of my Proof of Evidence explores the Council's Housing Trajectory specifically in relation to Paragraph 177 of the Framework 2023
- E4. My Proof of Evidence has explored the relevant policy context and other key material considerations such as National Policy and Guidance, relevant Appeal Decisions and Case Law and demonstrates the following:

- The Council has a long track record of under-delivery and has in fact never been able to demonstrate a 5-year housing supply since the start of the LPP1 Plan Period in 2013;
- The Council's past deliver assumptions have been optimistic when compared with actual rates of delivery;
- Waverley is one of the least affordable places to live in the country outside of London and prices are continuing to rise;
- The Council's current assessment of supply does not meet the requirements of the Annex 2 test (even when the recent interpretations of Annex 2 are taken into account);
- The Council's current assessment of windfall delivery fails to meet the 'high bar' of compelling evidence set by Paragraph 71 of the Framework 2023;
- As a consequence, the level of supply identified by the Council should be reduced;
- The Appellant's position is that the Council cannot demonstrate a 5-year housing land supply and that the level of supply is substantially below that relied upon by the Council;
- Paragraph 11 d) of the Framework 2023 is firmly engaged in the determination of this Appeal;
- The underlying point here is the need to significantly boost the supply of housing nationally, which is an objective the Government takes very seriously and has sought to address through fundamental changes to the planning system to ensure that much needed homes are provided in the areas where communities need them most. These Appeal proposals seek to assist in meeting that need in Waverley Borough;
- It is a requirement of Government that the Council seeks to remedy its housing land supply shortfall. In circumstances where the Adopted Local Plan has failed to deliver sufficient homes and its housing delivery policies are out-of-date the Council needs to take a positive and proactive approach to the release of suitable and sustainable greenfield sites such as this Appeal site;

- In the context of the wider housing trajectory the need for more housing in the Borough extends beyond the current 5-year period. The delays in start date and delivery of Dunsfold Aerodrome and other impediments in bringing other sites forward coupled with the failure of the Council to adopt the position approach towards housing provision that the LPP1 Inspector recommended has now led to a significant shortfall in the total housing delivery for the Plan period relative to the minimum LPP1 housing requirement;
 - Even applying all other sources of supply including sites that the Council has previously rejected at the plan making stage or resisted at the planning application stage, there is still a shortfall;
 - Delivery of housing on this Appeal Site is therefore needed both for the current 5-year period and in terms of the LPP1 Plan period. Whilst delivery of housing on the Appeal Site will not resolve the substantial shortfall it will make a meaningful contribution towards the significant unmet housing need and will have a positive contribution towards meeting affordable housing needs in Haslemere;
 - The grant of planning permission for housing in this location will have a positive short-term and long-term economic benefit (Mr Collins deals with this in detail in his Proof of Evidence); and,
 - The requirements of Paragraph 177 a) of the Framework 2023 are therefore met in terms of the need for housing on this site.
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