

EXAMINATION OF THE WAVERLEY LOCAL PLAN PART 2

EXAMINATION STATEMENT ON BEHALF:

Bewley Homes Plc
Reside Developments Limited
Monkhill Limited
Redwood (South West) Limited
Crownhall Estates and Castle Properties

Inspector's Focussed Questions for Contingency Hearing Session
06 September 2022
Matter 2 – Housing Requirements, Supply and Allocations

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August 2022

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24 August 2022

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Appendices:

Appendix 1	Housing Trajectories: <ul style="list-style-type: none">• Trajectory 1a Whole Plan based on WBC-LPP2-29 with Dunsfold adjusted• Trajectory 2a Whole Plan based on WBC-LPP2-29 and applying Annex 2 and Paragraph 71 of the Framework to supply sources
Appendix 2	Copy of article in Haslemere Herald dated 04 August 2022 concerning Dunsfold Aerodrome

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Matter 6 – Housing Requirements and General Supply Matters

11 June 2022

1.0 Introduction

- 1.1 This Examination Statement provides a response on behalf of the following parties:
- Bewley Homes Plc
 - Reside Developments Limited
 - Monkhill Limited
 - Redwood (South West) Limited
 - Crownhall Estates and Castle Properties
- 1.2 This Statement addresses the Matters Issues and Questions raised by the Inspector on 29 April 2022 relating to housing requirements and general supply matters (Matter 6).
- 1.3 The parties identified in Paragraph 1.1 above have decided to present a combined response to Matter 6 in order to assist the Inspector in the efficient running of the Examination and to reduce the amount of evidence relating to housing requirements and land supply matters to be considered.
- 1.4 This Statement only addresses the general matters of housing requirements and land supply insofar as they relate to the Soundness of the Plan and does not seek to promote any of the above parties individual land interests within the Borough. The individual parties will address site specific matters as necessary at the relevant Examination hearing sessions.

2.0 Matter 2 – Housing Requirements, Supply and Allocations

- 2.1 This Statement focusses on general matters concerning housing requirements, supply and allocations and consequently only considers Questions 1 and 2 (together) in the Inspector's focussed MiQs for the 06 September 2022 contingency hearing session.
- 2.2 This Statement should also be read in conjunction with Neame Sutton's previous Matter 6 Statement and alongside the verbal evidence presented by David Neame at the July 2022 Examination Hearing Sessions.

Question 1: Taking into account evidence provided by the Council during the July hearings, and any updates to this pursuant to corrections and clarifications requested prior to closure of those hearings, are the requirements set out in proposed main modifications (MMs) for the following settlements justified?

- C. Witley (including Milford)?*
- D. Haslemere?*

Question 2: Do the Council's updated trajectory and related information provide a justified basis for setting out the anticipated rate of development for specific sites (per paragraph 74 of the Framework) by way of appropriate main modifications?

- 2.3 Neame Sutton has updated the housing trajectory analysis prepared for Matter 6 in the light of the Council's documents submitted on 18 July 2022¹. Neither of the Council's documents answer the delivery evidence presented in our Matter 6 Statement and discussed at the relevant Hearing Session.
- 2.4 The Council's documents are not supported by any evidence to justify the position the Council is now seeking to take in relation to the housing trajectory and in turn the 5-year housing land supply position as at 01 April 2022.
- 2.5 In fact the Council's own Development Management team continue to report to Members that the Council cannot currently demonstrate a 5-year housing land supply and that the tilted balance (Paragraph 11 d) of the Framework 2021) is engaged in the determination of planning applications across the Borough. The most recent example of this is a determined made by the Council on 23 August 2022 where Officers confirm a 4.3 year housing land supply².
- 2.6 No formal 5-year housing land supply analysis has been published by the Council to support the figures set out in WBC-LPP2-29.

¹ WBC-LPP2-29 and WBC-LPP2-30

² Application Ref: WA/2022/01433 – Determined on 23 August 2022

- 2.7 It is clear that if the delivery trajectory for Dunsfold Aerodrome alone is adjusted to reflect the evidence that the Council will be unable to demonstrate a 5-year housing land supply throughout the remaining years of the Plan period leading to a minimum shortfall of **-1,036 dwellings**. See Trajectory 1A attached at Appendix 1.
- 2.8 If the requirements of Annex 2 and Paragraph 71 of the Framework 2021 are applied to the remaining supply sources relied upon by the Council, which includes a number of new introductions from the evidence the Council presented at the Matter 6 session, the level of supply falls dramatically leading to a shortfall of at least **-1,655 dwellings**. See Trajectory 2A attached at Appendix 1.
- 2.9 The additional documents provided by the Council in July 2022 do not therefore rectify the significant deficiencies in the housing delivery trajectory for the Borough and in fact demonstrate that, on the Council's latest evidence, the LPP2 will continue to fail and the minimum housing requirement set out in the LPP1 will not be met. This has dramatic consequences for the residents of Waverley, particularly those who are in desperate need of affordable homes and those struggling to get on the housing ladder in the most expensive LPA in the Country outside of London.
- 2.10 I will deal with the detailed flaws in the Council's latest documents verbally at the contingency hearing session on 06 September 2022, but it is worth noting an important update relating to Dunsfold Aerodrome at this point.
- 2.11 At the beginning of August 2022 the Council received confirmation from the site owners Trinity College Cambridge that the purchaser Columbia Threadneedle had pulled out of the deal to buy the site. The consequence of this cannot be underestimated in terms of the Council's current approach to housing delivery set out in WBC-LPP2-29. It is inevitable that there will be further significant delay in the delivery of homes on the site if in fact it will deliver any homes during the current Plan period.
- 2.12 The press article from the Haslemere Herald from 04 August 2022 (attached at Appendix 2) confirms the position and is one of many articles published at that time. Of particular note is the quote from a Council spokesperson that: *"At present, we have not seen Trinity College's immediate plans for ownership of the site and will consider options when they become clear."*
- 2.13 This confirms as recently as 04 August 2022 that the Council has no idea what will be happening at Dunsfold and therefore it cannot possibly seek to rely on delivery of dwelling completions on this site within the next 5 years.

- 2.14 The impact of this is illustrated in Trajectory 1A and it is clear that there is a need now, through the LPP2 to identify further housing allocations to make up the shortfall in the minimum housing requirement over the Plan period. As we have already explained there are numerous sites available across the Borough that have been assessed by the Council and have willing developer/promoters in place to bring them forward and rectify the shortfall in supply.
- 2.15 Unless this is dealt with now the trajectory relied upon by the Council will fail not only to maintain a rolling 5-year housing land supply but also to meet the minimum housing requirement over the Plan period and would therefore be unsound. Furthermore it is not possible to determine that the requirements set for Haslemere and Milford in the LPP2 are sound unless this wider issue is resolved first.
- 2.16 As proposed to be modified by the Council the LPP2 remains unsound.
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