Local Planning Authority Response

to the Appellants' submissions (in relation to Ground 'g') for Pitch 1

APP/R3650/C/25/3367392

Appel by Mr Barney Doherty

Pitch 1, Land West of Stovolds Hill, Cranleigh

These comments relate to the Statement submission from Dr Angus Murdoch dated 8 June 2026 and include specifically the attachment of evidence previously prepared by WS Planning in response to the Council's Gypsy and Traveller Accommodation Assessment 2025 (GTAA) and associated Pitch Delivery Assessment (PDA), as submitted the Inquiry relating to nearby pitches in June 2026 (sites referred to as Sites A, B, C, D: 'The Clegg Appeals' (**3313865, 3314447, 3322400, 3323108**)). The evidence now produced by the Appellant was appended to the Appellant's Statement as Appendix GG2.

Appendices:

Appendix WBC23 - Local Planning Authority original response to the rebuttal evidence re GTAA of May 2026

Appendix WBC24 - Local Planning Authority update on need and supply, provided to The Clegg Inquiry 23rd June 2026

Appendix WBC25 – Extract of Inspector's Report on the Waverley Borough Council, Local Plan Part 2 re Traveller Accommodation, March 2023

Appendix WBC26 - 3337697 Appeal Decision, Land rear of Burnt Hill

Appendix WBC27 – Crocus Lane planning permissions, 2017 – 2026

Appendix WBC28 – Crocus Lane Rental Adverts, 2024 - 2026

1. Introduction

1.1 The Appellants' submission on ground 'g' relies on the identification of 'need' for new sites and on how long it will take the appellants to find an alternative site. In making this submission it is suggested that the GTAA completed in January 2026 is incorrect, and that the associated PDA (included in the GTAA) is the reason that the Appellants required more time to respond.

1.2. The Statement refers at para 17 to The Clegg Appeals and to evidence submitted by the Appellants to those appeals in response to the GTAA and PDA and attaches a copy of that response as Appendix GG2 of the Appellant's Statement. Dr Murdoch now adopts the evidence in Appendix GG2 as his response to the GTAA and PDA (para 26).

1.3. This statement responds to the submissions made especially in GG2. In doing so it refers to submissions already made in response to these details, specifically in May 2026 and in an update from the Local Planning Authority on the 5-year supply of sites, as provided to the Clegg Inquiry on 23rd June 2026.

2. Local Planning Authority Response

2.1 The Appellant's submission is predicated upon the only considerations relevant to ground (g) being those relating to how long it may take the gypsies to find an alternative site (including personal circumstances). In the present case the harms identified include landscape, ecology and flooding. Cumulatively these harms provide evidence of great weight, such that a short period is necessary so as to end the harms and to allow the ecology on the site to be restored, and the flooding situation to be resolved.

2.2 In relation to flooding matters, this currently presents a serious risk to those on site in the design flood event and to the users of Crocus Lane in events as common as the 1 in 1.67 year event.

2.3 In terms of length of time needed to find another site, 6 months strikes a fair balance, not 2 years:

5 Years supply

2.4 Waverley have had a suitable five-year Gypsy/Traveller supply of sites for many years. This is confirmed (chronologically) by the GTAA in 2018; by the findings of the Local Plan inspector for LPP2 in 2023 (when allocating sites); and by the decision of Inspector Willows in an appeal decision relating to 'Land rear of Burnt Hill' in 2024. An extract from the report of the Local Plan Inspector is attached as **Appendix WBC25** and the appeal decision ref. 3337697 for Land rear of Burnt Hill in **Appendix WBC26** (see paras 67-71).

2.5 Waverley have quite properly sought to keep this position up to date by commissioning an updated GTAA and PDA (in 2025) which confirms that the

Local Planning Authority still has a five-year supply (see CD6A.2 to the s78 appeals for pitches 1 and 2).

2.6 Insofar as the 5-year supply issue is relevant, the evidence provided by the Local Planning Authority demonstrates that there is 5 years supply. This is explained in the evidence previously provided to the Clegg Appeals, in direct response to the Rebuttal submitted by WS Planning (document GG2 as now adopted by Dr Murdoch at para 26), and in the update to this evidence as provided on Day 10 of the Inquiry (23rd June) into the Clegg Appeals. The latter document provides an update on the supply of sites, taking into account the latest planning permission at Stovolds Hill (ref. WA/2026/00215, 5 additional pitches at Ranch Park, Crocus Lane, granted 23 March 2026) and the allocated sites referred to in the Waverley Local Plan. The supply surplus is now 23 pitches. The Local Planning Authority original response to the rebuttal evidence re GTAA dated May 2026 is appended as **Appendix WBC23**, and the more recent update on the need /supply position provided 23 June 2026 is appended as **Appendix WBC24**.

Alternative Sites

2.7 In terms of alternative available sites, Local Plan allocations referenced DS15, DS17 and DS19 are available (see update evidence, dated 23rd June).

2.8 In addition, the sites with planning permission south of Crocus Lane as identified on the plan appended as **Appendix WBC27** and described in **Appendix WBC15** (already submitted with the LPA's Statement of Case) sets out details (as of January 2026) of sites with planning permission that are either vacant or occupied by non-travellers. Many of these sites have been offered for rent to the general public. **Appendix WBC28** provides details of caravans offered for rent at Crocus Lane (2024 – 2026) and **Appendix WBC15** identifies where sites have been included in such adverts.

2.9 Any assertion that all the sites at Lydia Park that have planning permission are occupied by gypsies and travellers' lacks credibility in the light of the evidence within **Appendices WBC15** and **WBC28**.

2.10 Examples of pitches available to the applicants include:

i) WA/2020/0516 – now WA/2025/1859 page 5 of **Appendix WBC15**. The Original planning permission was for 5 pitches, a BCN was served in respect of excess caravans, Planning Permission was granted to increase to 9 pitches; There were 5 statics on site in January 2026, none of which were occupied at the time.

ii) WA/2020/1866 - (Yellowstone), page 13 of **Appendix WBC15**, Planning permission granted for 9 pitches but has been laid out to include 31 Park Homes. There are just 2 gypsy/Traveller households in occupation

iii) WA/2021/02392 - (Ranch Park), page 15 of **Appendix WBC15**. The original Planning permission was for 5 pitches, but the site occupied by 24 (vacant) Park Homes. A Breach of Condition Notice (BCN) was served in relation to the site in October 2025. Planning permission WA/2026/00215 was then granted for 5 additional pitches (for a net total of 10) in March 2026.

2.11 The Appellant's statement itself does not produce any evidence of efforts made to find alternative sites. One would expect such evidence to include evidence of enquiries being made in respect of other sites served by Crocus Lane itself, given all the sites being advertised for general rent.

2.12 In summary of the above, and with specific regard to the identified planning harms and availability of suitable alternative accommodation, the LPA maintains that a compliance period of 6 months is a sufficient time for the Appellant to comply with the requirements of the notice.