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

**EXAMINATION OF THE WAVERLEY LOCAL PLAN PART 2 - INSPECTOR'S FOCUSED
QUESTIONS FOR CONTINGENCY HEARING SESSION 6 SEPTEMBER 2022 (05 AUGUST
2022)**

Our representations should be read in association with those previously submitted.

Following on from the July Hearing sessions, we are invited to make comments forward of the September Hearing sessions.

Matter 2: Housing requirements, supply and allocations

Whilst it is appreciated that the Inspector's questions are focused on the five main points set out within the above document, we would like to make more general points and largely reiterate what has been set out within previous representations and to highlight recent developments / matters that came to light during the course of the July Hearing sessions.

We will keep our comments brief, but may well look to elaborate further during the virtual Hearing sessions in September.

The first matter, and this is something which took all of the representatives in attendance at the July Hearing sessions by surprise, is that the Waverley Borough Council is not seeking to address its 5-year housing land supply shortfall within its Local Plan Part 2 (LPP2).

Having been in attendance at the Hearings when the Local Plan Part 1 (LPP1) was being assessed, it was very much the case that LPP1 was able to progress toward adoption on the basis that the LPP2 was close behind and address any housing shortfall. However, and as observed at the July Hearings, neither has happened.

It is now some four-and-a-half years since the LPP1 was adopted, and we can take no comfort with Waverley saying it will 'soon' be starting work on reviewing the LPP1.

With the LLP2, Waverley does have an opportunity to address its housing shortfall, yet is reluctant to do so even though this was the premise for the adoption of the LLP1 back in February 2018.

It is also the unfortunate, but truthful, matter that year-on-year there is the scenario where Waverley produce its Five Year Housing Land Supply Position Statement setting out that it has a sufficient housing land supply, only for a few months later, as appeal decisions come through, to reveal this is not the case.

As such, Waverley is clearly not a proactive Local Authority which seeks to address its housing shortfall, as was evident at the July Hearing sessions.

Within the Focused Questions document, reference is made to the Milford Golf Club (MFG) site and the status of its deliverability.

At the July Hearing sessions, it was clear that the holder of the restrictive covenant would not be surrendering the restrictions on the land and the matter would be going to tribunal.

Although this is beyond my remit of specialism, as planning permission has been granted on the site and a developer is 'on-board', it does appear as though development may well take place thereon. However, the matter of timing is still unknown, and as such, reliance cannot be placed on this site coming forward in a timely manner.

The other significant matter that was identified during the course of the Hearing sessions related to whether the Dunsfold Park development would happen.

We are now a few weeks further on from the July Hearing sessions and in this time, it has been learnt that the new potential purchasers of the site, Columbia Threadneedle, has pulled out of the sale of the site.

Further, the consent given to UK Oil and Gas (UKOG) for gas and oil exploration near the Dunsfold site was highlighted during the July sessions as being another factor which adds further doubt on whether the Dunsfold Park development will take place.

It is noted that Waverley, itself, is seeking to challenge the grant of permission through the High Court.

Whilst it is also noted that Waverley's has said about the drilling being ***completely at odds with our declared Climate Emergency and similar declarations made by the County Council and the Government*** [as quoted Councillor Paul Follows, Leader of Waverley Borough Council and posted on Waverley's website], it has to be in the mind of the Council that gas and oil exploration will add another layer of difficulty with the Dunsfold site coming forward.

Observations made at the July sessions also saw questions relating to the deliverability of other sites - for an example being the old Voyger site, Royal School site and Fariground car park site having question marks over their availability - transcripts can be provided if you wish.

Accordingly, I do not think it unfair to say that Waverley's assessment of suitable, developable sites has been far from flawless.

In going back to the July Hearing sessions largely surrounding the Council's view that to omit the housing that Dunsfold will provide would undermine its strategic strategy, it is considered that a) a realistic and pragmatic approach has to be taken to provide a an adequate degree of housing land coming forward and b) it is considered that policy ALH1 of LLP1 sets out many locations where it has been agreed that new development can take place in order to meet local housing need (although, extraordinarily, every site that has been put forward for development in and around Wonersh has been rejected by the Council). Thus, it is not the case that the sites and locations identified are the only sites and locations the Council has to include within the LLP2.

Therefore, it seems rather strange that the Council would seek to continue to look to argue that questionable sites are likely to come forward in a timely manner, when a number of other sites, which too have been assessed, are able to provide much needed new development are able to come forward as soon as required.

The site lies within the non-statutorily designated Area of Great Landscape Value and 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 LLP2 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 Wonersh 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 September virtual hearing sessions .

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

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