



D&M PLANNING Ltd
Chartered Town Planners

1A High Street, Godalming Surrey GU7 1AZ | 01483425705 | info@dm-planning.co.uk
www.dm-planning.co.uk

Our Ref: 131/08/JJ

24 August 2022

G J Fort BA PgDip LLM MCD MRTPI
C/O Ms Charlotte Glancy
Banks Solutions
80 Lavinia Way
East Preston
West Sussex
BN16 1DD

LAND AT HURST GATE PORTSMOUTH ROAD MILFORD GU8 5HH

**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)**

As previously set out, D&M Planning Limited has been instructed by Mr D Thompson 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.

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 though, 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 Dunfold 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 Voyager 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 sets out many locations where it has been agreed that new development can take place in order to meet local housing need. 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.

Whilst writing, we would remind the Inspector of the virtues of the submission site in that whilst it is located within the Green Belt, it is not subject to any specific landscape designations, such as the Surrey Hills Area of Outstanding

Natural Beauty or the locally designated Area of Great Landscape Value which lie some distance from the site.

Although the site is located outside of the settlement boundary, its close proximity and relationship to the settlement of Milford, and the presence of the A3100, mean that the site has the 'feel' of being part of the village, as opposed to it being, technically, situated within open countryside.

The site has an existing vehicular access onto the Portsmouth Road, with good visibility, and is well screened by mature planting and trees.

It is within close proximity to many local shops, services and many other local amenities.

The site is also in close proximity to a frequent, regular bus service, and within walking distance of Milford mainline railway station.

The inclusion of the site within the Settlement Area of Milford would be logical, because of its position in relation to the Settlement Boundary and being located in such a sustainable position.

The topography of the site and surrounding land, coupled with the existing natural screening, would have the resultant effect that new development would not be readily conspicuous when being viewed from outside of the site.

The site has strong boundary definition on all sides meaning that development at the site would extend no further than its confines.

Furthermore, because of the existing screening currently *in situ*, this would mean that if residential development were to take place at this site, the impact upon the open countryside would be minimal.

It is submitted that, due to its size, location, appearance and condition, the site makes little contribution to the open countryside. It is therefore considered that a high quality and sympathetically designed proposal would have a positive impact upon this area of Milford.

It is important to note that the acceptability of this site coming forward can be put into the context of the adjacent Milford Golf Course, which lies immediately to the south and east of the submission site, development here has been found to be acceptable. As such, it is not unreasonable to come to the conclusion that if development at Milford Golf Course can be acceptable, then so, too, can it at the submission site.

Additionally, with only three sites within the Parish of Witley (Witley and Milford) coming forward (namely the Secretts site, the Wheeler Street Nursery site and the Highcroft site), the Council is placing a great deal of belief that all of these sites will come forward.

Like these sites, we submit that:

- That development at the site can achieve a holistic and integrated scheme for the whole site that maximises connectivity and delivers the necessary infrastructure and direct access into Milford village centre.
- The sympathetic design and layout of the proposal, coupled with its scale, location and proposed landscaping would not have a detrimental impact upon the Milford Conservation Area and Grade II listed buildings.
- The proposal can be built-out whilst ensuring the protection and enhancement of existing trees, hedgerows and adjacent pond which makes an important contribution to the character of the local area;
- The proposal includes the provision of an appropriate landscape buffer including trees and hedgerows on western boundary of the site.
- Suitable, safe access and egress can be achieved for vehicles can be achieved on to and off of the A3100 Portsmouth Road.
- The proposal also includes the provision of sustainable transport measures which may include on-site and off and off-site pedestrian crossing improvements, footways and cycle ways.
- The application demonstrates that development will not have a detrimental impact upon protected habitats sites, including the provision of SANG or other mitigation measured deemed appropriate to avoid significant impact to the Wealden Heaths Special Protection Area (SPA).

We have nothing further to add at this stage but may wish to add further points / provide clarity at the September 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 D Thompson