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**LAND TO THE WEST OF WEST COTTAGE, PORTSMOUTH ROAD, MILFORD,  
SURREY GU8 5BD**

**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 set out previously, D&M Planning Limited has been instructed by Mousehill Limited 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 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 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 of LLP1 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.

With regard to the virtues of the submission site, we wish to reiterate those previously stated.

The comments within the Council's Green Belt Appraisal (August 2020) that development of the will result in an uncharacteristic cluster as the site is well located to the settlement boundary of Milford and can accommodate new development, in-keeping with the general grain and pattern of the existing development within the vicinity.

If the possible pattern of development is a factor in assessing the suitability of a site for release from the Green Belt, a view could be taken that the Secrett's site, the Wheeler Street Nursery site and especially the Highcroft site (which have been identified within the Local Plan Part 2 as being suitable for new development) would all result in development uncharacteristic with their surroundings.

Furthermore, with only three sites within the Parish of Witley (Witley and Milford) coming forward, the Council is placing a great deal of faith that all of these sites will come forward.

With regard to the Green Belt appraisal's comments that the site is characterised by considerable tree cover, whilst there some trees on the site, it is not 'considerable', and the character of the site is more akin to a residential garden curtilage.

It is worth noting, also, that the site was provisionally allocated as being suitable for development under DS27 of the previous version of the draft Local Plan Part 2 and also by the draft Witley Neighbourhood Plan.

In accordance with Central Government guidance, it is submitted that the best use should be made of the submission site, in producing a sustainable development whilst paying due regard to the character and grain of existing development within the wider area.

Although the site will be able to provide a limited number of new units, it is worth noting paragraph 69 of the NPPF in that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.

It is also important note paragraph 1.2 of the LLP1, which, *inter alia*, states

***Local Plan Part 2, which is to follow, will contain development management policies, site allocations and land designations. The scope of Local Plan Part 2 provides the potential to allocate sites of any size.***

We have nothing further to add at this stage but may wish to add further points / provide clarity at the virtual Hearing sessions which due to take place in September.

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 Moushill Limited