



**DRAFT UPPER TUESLEY DEVELOPMENT BRIEF
SUPPLEMENTARY PLANNING DOCUMENT**

**Consultation Statement
June 2012**

Introduction

The Council is required to prepare its Supplementary Planning Documents (SPDs) in accordance with the procedures set out in the Town and Country Planning (Local Development) (England) Regulations 2004 as amended (2008 and 2009).

Regulation 17 requires that before an SPD is adopted, a Consultation Statement be prepared setting out who was consulted in connection with the preparation of the SPD, how they were consulted, a summary of the main issues raised in those consultations and how those issues have been addressed in the SPD.

The draft Upper Tuesley Development Brief Supplementary Planning Document (SPD) was approved for consultation by Waverley Borough Council's Executive Committee on 29 November 2011.

The draft document has evolved from Saved Policy RD6 (major developed site within the green belt) of the Waverley Local Plan 2002. Supplementary Planning Guidance (SPG) adopted in 2003 and an agreed update statement from 2006 has also been used to shape the draft SPD. However, the previous documents, whilst useful, do not provide the clarity required to bring a suitable planning application forward. In addition, the provisions of the National Planning Policy Framework (NPPF) have been considered and where necessary the document updated to reflect current policy thinking.

The proposed SPD aims to set a clear framework for the future development of the site, to which a future planning application will be assessed.

Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) & Appropriate Assessment (AA)

Following the 2009 amendments to the Town and Country Planning (Local Development)(England) 2004, new SPD's are no longer required to be included within the Local Development Scheme (LDS) or be subject to a Sustainability Appraisal (SA).

With regard to a SEA, a screening opinion was considered by Waverley Borough Council, and sent to English Heritage, Natural England and the Environment Agency for consideration. Given the responses of the consultation and the recommendation from the consultants (Parsons Brinkerhoff), it was considered that the Upper Tuesley Development Brief SPD is unlikely to have significant environments effects. Therefore a full SEA environmental report is not required.

Following a screening exercise under the Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations), and with advice from Natural England, it was concluded that an 'appropriate assessment' (Stage 1 AA) was required prior to the adoption of the proposed SPD. This has been undertaken and Natural England was consulted. The conclusion of the AA was that there will not be recreational pressures beyond the site boundary, and that there is also no risk of in-combination effects leading to adverse effects on the integrity of the relevant sites.

The outcomes of the above processes have also fed into the evolution of the draft Upper Tuesley Development Brief SPD.

Consultation Process

The draft Upper Tuesley Development Brief SPD was subject to a statutory consultation between Monday 5 March 2012 and Monday 16 April 2012 (a period of 6 weeks).

The draft SPD was accompanied by the SPD Matters, a formal statement of availability and a formal notice that appeared in the local paper (See **Appendix A**). The document was also available to view in the following locations:

- to read or download from the Council's website (via www.waverley.gov.uk/uppertuesley),
- to view at Planning Reception, Godalming,
- upon request from Planning Policy.

A variety of key stakeholders were invited to participate and each was contacted by letter. These stakeholders included:

- Primary Care Trust & NHS Surrey
- Busbridge Parish Council
- Witley Parish Council
- Godalming Town Council
- Surrey County Council (including Highways, Rights of Way and Education)
- Surrey Supporting People Team
- English Heritage
- Natural England
- Environment Agency
- Design Council (previously CABE)
- Guildford Borough Council
- Milford Hospital League of Friends
- Relevant internal Waverley Officers

In addition over 1,200 local properties were sent a letter inviting them to participate.

An exhibition was also held at the Clockhouse Day Centre in Milford from Tuesday 27 March to Thursday 29 March (from 1600 to 2000 each evening). Representatives from LDA Design and Parsons Brinkerhoff (consultants involved in the production of the SPD and associated Sustainable Transport Options study), as well Officers from Waverley Borough Council, were on hand to answer questions related to the site. Questionnaires were also distributed to those who attended and wished to respond.

Whilst the notification was focused, this did not prevent any other interested parties from getting involved with the consultation.

Respondents were able to comment on the draft SPD in a variety of ways, including:

- using the online consultation portal (Objective), which was linked to from the main web page (this required the respondent to register),

- using the online survey (SurveyMonkey), which will be linked to from the main web page (this did not require registration),
- by email directly to Sarah Wells,
- by letter, or
- by form at the exhibition.

Two key questions were asked of respondents:

1. Do you have any comments on the draft Upper Tuesley Development Brief SPD?
2. Should the draft Upper Tuesley Development Brief SPD cover any other issues?

Respondents were also given the opportunity to give any additional comments that they thought were relevant to the draft SPD.

In addition to the above, the Community Overview and Scrutiny Committee considered the draft SPD at their meeting on 12 March 2012. This gave Members the opportunity to comment on the document and its contents. The minutes of the meeting can be found at **Appendix B**.

Consultation Response

Over 80 responses were received to the consultation from key stakeholders, local organisations and local residents. A full summary of the main issues raised is attached at **Appendix C**.

The main issues raised by the consultation are outlined in the following table, with an indication of how they have been taken forward.

Issue	Summary of consultation responses	SPD response
Planning policy	The document should be updated to reflect the recently published National Policy Planning Framework (NPPF) and then subject the document to a further consultation.	The document has been amended to reflect the NPPF. In addition the proposed SPD is not inconsistent with the NPPF. There is no need to undertake a further consultation on this basis.
Principle of development	Some respondents support the development of housing and affordable housing on the site, however raise strong reservations with regard to the additional traffic that 120 units will generate. Others considered that this is not a suitable site for a housing development or that the development would set a precedent.	The principle of development was established in Saved Policy RD6 of the Waverley Local Plan 2002. The NPPF has not changed this position accepting that complete redevelopment of previously developed sites is acceptable (subject to specific criteria). In addition the Upper Tuesley development would not set an undesirable precedent as other developments would need to meet the strict tests set out in the NPPF.
Consultation	The consultation was criticised by some as not being wide enough, with key stakeholders not being included and the exhibition being held in the wrong location.	A significant consultation has been undertaken. Full details can be found in this document.
Transport	<p>A full overview of the transport comments is included at Appendix B. However, two key issues were identified.</p> <ol style="list-style-type: none"> 1) the impact of the proposed 120 units on the existing highway network, and 2) the sustainability of the location of the site. 	<p>1) Surrey County Council (Highways) is satisfied that the methodology used is the most appropriate for the site. In essence the methodology relies on the lawful use of the site, and the potential to bring it back into use. This might also mean an alternative use within the same use class (this would be C2 – Residential Institutions).</p> <p>SCC consider that the vehicle movements associated with the proposed development are commensurate with this</p>

Issue	Summary of consultation responses	SPD response
		<p>fall back position and have raised no objection to the principle of 120 units on the site. However, it is important to note that the SPD is in place to provide a high level framework and specifically explains that the 120 units is indicative and can only be positively supported if a full Transport Assessment concludes that this is appropriate (at the planning application stage).</p> <p>2) It is accepted that the site is relatively isolated. However, the site is an allocated major developed site within the Green Belt as supported by Saved Policy RD6 of the Local Plan and paragraph 89 of the NPPF, therefore deeming it to be an exceptional circumstance for development.</p> <p>In both of the above instances, appropriate mitigation measures are required to improve transport choice and encourage future residents to minimise car use and to also improve the traffic situation (for example by deterring cars from using Tuesley Lane and improving other local junctions). A number of mitigation measures were suggested in the supporting Sustainable Transport Study, however this list was not exhaustive and additional measures will need to be considered. It is expected that the full Transport Assessment will consider this in</p>

Issue	Summary of consultation responses	SPD response
		greater detail and reach a conclusion (in conjunction with SCC) on the most appropriate measures to be implemented.
Green Belt	<p>Respondents considered that the development would impact on the openness of the Green Belt and that because it is protected the site should not be developed. However, others accepted that it is a previously developed site.</p> <p>Further comments we received about the constraints on development, including that the 8,000 sqm footprint should not include temporary buildings and that the height of the proposed development should follow the average height on site.</p>	<p>Whilst the site is within the Green Belt, provision is made in the NPPF (and Saved Policy RD6) for the partial or complete redevelopment of a previously developed site (subject to certain criteria). Upper Tuesley is deemed to be a previously developed site.</p> <p>The criteria set out in the NPPF means that the principle consideration relates to the impact on the openness of the Green Belt. This can only be fully considered at the planning application stage, when more detail is available.</p>
Affordable housing	<p>Affordable housing was raised as a concern as many did not understand how the affordable housing would be provided, who would live in the affordable homes and how it would be allocated. In addition a small minority considered that this is not an appropriate site for affordable housing because of the perceived social concerns that might result (and suggested commuted sums as an alternative rather than providing onsite). Others considered that affordable housing for families is desperately needed in the local area.</p>	<p>Affordable housing is a key priority of Waverley Borough Council and this site is considered suitable for bringing forward much needed properties for local people and families. Commuted sums are only to be accepted in exceptional circumstances. A definition of affordable housing will be added to the SPD to clarify the nature and form of these homes.</p>
Alternative uses	<p>Alternative uses should be considered for the site, including a retirement village or sheltered accommodation for the elderly, fewer larger homes, all new homes should be in the form of affordable housing and Tuesley Farm workers</p>	<p>Whilst the SPD focuses on a residential development, this does not preclude alternative uses coming forward and being supported – subject to their compliance with the NPPF and development plan policies. Tuesley Farm</p>

Issue	Summary of consultation responses	SPD response
	should be accommodated on the site.	workers would be eligible to apply for any new affordable homes along with other Waverley households, with units allocated in line with the Council's Allocation Scheme.
Design	Concern was raised over the density proposed (30-50dph resulting in 350 houses), the size of the properties and the perception that this would be a hideous housing estate. However, others felt that the scheme should include a village green, children's play areas and suitably accommodate the car. They also were pleased to see a reduction in numbers from the previous schemes and supported the requirement for a high quality development.	It is not clear where the 350 houses originated as the SPD proposes 120 units. The policy section of the SPD outlines why Saved Policy H4 is not necessarily relevant to this scheme and that there is a local need for larger family homes. The photographs within the SPD are not intended to indicate a preferred design approach, but to highlight specific design elements (such as children's play space).
Retention of buildings onsite	There was a conflicting response to the water tower. Some wish it to be retained and bought into a productive new use, whilst others considered it an eye-sore. In addition there was a request that those buildings that are of local interest should be included within a plan in the document.	In order to accommodate the opposing views about the water tower, the SPD has been updated to give the potential for it to be retained. English Heritage have visited the site and determined that none of the buildings are of national significance and are therefore not listed. However they did express the view that some of the buildings might be of local interest. However, this does not mean that they should be retained. The plan on page 26 indicates the buildings that are to be demolished.
Environmental	Most of the comments relating to the environmental aspects of the site relate to the need for appropriate ecological surveys and ensuring flood risk and drainage is appropriately considered. Concern was raised that a Strategic	These points have been noted, and appropriate surveys will be undertaken to support an Environmental Impact Assessment (necessary for a planning application of this type). In addition an Appropriate Assessment is required,

Issue	Summary of consultation responses	SPD response
	Environmental (SEA) Assessment was not required.	and has been produced to support the SPD.
Sustainability	Most points relating to sustainability concerned the reliance on the car given the location of the site. Other comments related to the specific measures being proposed within the built fabric of the development.	It is acknowledged that future residents living in both the private and affordable homes will want to use a car given the location. However, the mitigation measures proposed will give additional choice for residents. With regard to the built fabric of the development, the entire scheme is expected to be designed to Code Level 4 of the Code for Sustainable Homes (as opposed to just the affordable housing element) as well as requiring at least 10% of the expected energy generation to come from onsite renewable/low carbon technologies.
Landscape	Many comments related to the retention of specimen trees on site (including the ancient woodland) and that the trees provide an important habitat for bats. Comments were also made about the long term management of the landscape.	Consideration will be given to the formal protection of individual trees on the site. The long term management and maintenance of the landscape will be a landowner matter, but one that can be controlled through conditions or a legal agreement associated with the granting of a planning permission. In addition a Landscape and Visual Impact Assessment will be required as part of an Environmental Impact Assessment to accompany any future planning application.
Schools	A significant concern for local residents is access to schools and the fact that local schools are already over subscribed. In addition concern has been raised that existing residents find it difficult to get their first choice school.	Surrey County Council (Education) has been consulted and explained that in order to accommodate the potential increase in school age children from the development, financial contributions will be required to increase capacity. However, they have not objected to the scheme on capacity grounds.

Issue	Summary of consultation responses	SPD response
Health provision	Concern was expressed that the local GP's do not have capacity for additional residents.	Evidence obtained for the Infrastructure Delivery Plan suggests that there is currently a slight under provision of GP's within Milford and Witley. However additional growth may potentially require additional GP services. Whilst this is a material planning consideration, it attracts limited weight. In essence it is market demand that will facilitate extra provision.
Milford Hospital	It has been requested that the proposed development contributes to improvements at Milford Hospital. In addition access (pedestrian and emergency vehicles) should not be compromised. Finally, concern was expressed that the proposed development would turn its back on the hospital.	<p>Planning contributions to support the hospital are unlikely to be appropriate in this case given that the PCT were previously the land owner and determined the area surplus to its requirements.</p> <p>The detailed design would be finalised through future planning applications, however linkages to the hospital will be important to aid good design. Access for emergency vehicles (to the hospital) will be accommodated in any new development; however this is a landowner matter.</p>
The Crescent	Concerns have been expressed that The Crescent has not been addressed in the document, and that this has led to uncertainty for the existing residents.	The SPD has been updated to include more information about The Crescent and the two options available (1) retain the existing buildings or (2) demolish and rebuild as part of the wider development. Waverley have no preference to the approach taken, which will largely depend upon the landlord issues associated with the tenancies.
Other matters	A variety of other matters were raised as part of the consultation including the need for onsite community facilities, the need for an archaeological survey, and the existence of the	<ul style="list-style-type: none"> • If viable community facilities could be provided on site, if not planning contributions are likely to be required. • Archaeology is a material planning

Issue	Summary of consultation responses	SPD response
	<p>Busbridge Lakes. It was also expressed that the HCA should be treated in the same way as any other landowner.</p>	<p>consideration and will be looked at in detail at the planning application stage.</p> <ul style="list-style-type: none"> • Busbridge Lakes – noted. • Whilst funding the SPD, the HCA have had no influence as to whether the document gets adopted or not.

Next Steps

Following the statutory consultation and having given consideration to all the consultation responses, the draft Upper Tuesley Development Brief SPD has been reviewed, amended and updated before being presented to Full Council in July 2012 for formal adoption.

Appendix A

- SPD Matters
- Statement of Availability
- Formal Notice (appeared in the Surrey Advertiser 2 March 2012)

Waverley Borough Council Local Development Framework

Statement of Upper Tuesley Development Brief SPD Matters

Title

Draft Upper Tuesley Development Brief Supplementary Planning Document.

Subject Matter

Sets out a framework of guidelines and principles against which future planning applications will be assessed.

Area

Applies only to the land adjacent to the operational Milford Hospital.

Representations

Representations must be made between 5 March 2012 and 16 April 2012. Representations should be made in writing and submitted to:

Sarah Wells
Planning Projects Team Leader
Waverley Borough Council
The Burys
Godalming
Surrey
GU7 1HR

or emailed to sarah.wells@waverley.gov.uk or submitted using the online consultation portal or using the online representation form at www.waverley.gov.uk/uppertuesley.

Any representation may be accompanied by a request to be notified at a specified address of the adoption of the SPD.

Inspection of Documents

From 5 March 2012 the draft Upper Tuesley Development Brief SPD will be available to view and download from the Council's website at: www.waverley.gov.uk/uppertuesley and is available for inspection at the following location:

Planning Reception
Waverley Borough
Council
The Burys
Godalming
Surrey
GU7 1HR

Opening hours:
9:00am to 5:00pm
Monday – Thursday.
9:00am – 4:00pm
Friday.

An exhibition will be held at the Clockhouse Day Centre, Chapel Lane, Milford, GU8 5EZ from Tuesday 27 March to Thursday 29 March between 4:00pm and 8:00pm.

Further information

Contact Sarah Wells on 01483 523488, by email sarah.wells@waverley.gov.uk or at the Waverley Borough Council address.

WAVERLEY BOROUGH COUNCIL

DRAFT UPPER TUESLEY DEVELOPMENT BRIEF SUPPLEMENTARY PLANNING DOCUMENT

STATEMENT ON AVAILABILITY OF THE DOCUMENT TO VIEW

The Draft Upper Tuesley Development Brief Supplementary Planning Document is available from 5 March 2012 on the Waverley Borough website at www.waverley.gov.uk/uppertuesley. Copies can also be viewed at the following location:-

Planning Reception,
The Council Offices, The Burys,
Godalming

Monday to Thursday 9:00am – 5.00pm
Friday 9:00am – 4.00pm

In addition, an exhibition will be held at the Clockhouse Day Centre, Chapel Lane, Milford, GU8 5EZ from Tuesday 27 March to Thursday 29 March between 4:00pm and 8:00pm.

[Notice for insertion in the Surrey Advertiser on 2 March 2012]

**WAVERLEY BOROUGH COUNCIL
TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND)
REGULATIONS 2004 AND (AMENDMENTS) 2008 & 2009**

In accordance with the above Regulations, the Borough Council gives notification that it intends to publish the draft Upper Tuesley Development Brief Supplementary Planning Document for public comments between 5 March 2012 and 16 April 2012. This document deals with matters that affect the land adjacent to Milford Hospital only. Comments should be passed to Sarah Wells at Waverley Borough Council, The Burys, Godalming Surrey GU7 1HR, by email sarah.wells@waverley.gov.uk or online via the links contained on www.waverley.gov.uk/uppertuesley. Any representations may be accompanied by a request to be notified at a specific address of the adoption of the Upper Tuesley Development Brief Supplementary Planning Document. The document can be inspected on the Waverley website www.waverley.gov.uk/uppertuesley or viewed in the following locations, during their normal opening hours:

Planning Reception, The Council Offices, The Burys, Godalming

In addition, an exhibition will be held at the Clockhouse Day Centre, Chapel Lane, Milford, GU8 5EZ from Tuesday 27 March to Thursday 29 March between 4:00pm and 8:00pm.

Appendix B

- Minutes of Community Overview and Scrutiny Committee (12 March 2012)

MINUTES of the MEETING of
the COMMUNITY OVERVIEW
AND SCRUTINY
COMMITTEE held on 12
MARCH 2012

(To be read in conjunction with the Agenda for the meeting)

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|------------------------------------|------------------------|
| Cllr Peter Isherwood (Chairman) | * Cllr Diane James |
| * Cllr Nick Holder (Vice-Chairman) | Mrs Samantha Johnson + |
| Cllr Maurice Byham | * Mrs Jane Rawlings + |
| * Cllr Jim Edwards | * Cllr Jane Thomson |
| * Cllr Brian Ellis | * Cllr Simon Thornton |
| * Cllr Jenny Else | * Cllr Brett Vorley |
| Cllr Mary Forszowski | * Cllr Andrew Wilson |
| * Cllr Michael Goodridge | |
| Cllr Christiaan Hesse | |

* Present
+ Tenants' Panel Representatives

Also in Attendance: Cllrs Brian Adams, Paddy Blagden, Elizabeth Cable, Carole King, Denis Leigh, Bryn Morgan, Stephen O'Grady, Donal O'Neill, Julia Potts, Adam Taylor-Smith, Keith Webster, Liz Wheatley.

Cllr Janet Somerville also attended and spoke on Item 13.

22. MINUTES (Agenda Item 2)

The minutes of the meetings held on 30 January 2012 were confirmed and signed.

23. APOLOGIES FOR ABSENCE AND SUBSTITUTES (Agenda Item 3)

Apologies for absence were received from Cllrs Maurice Byham, Mary Forszowski, Peter Isherwood. Cllrs Tony Gordon-Smith and Nick Williams attended as substitutes.

24. DISCLOSURE OF INTERESTS (Agenda Item 4)

No interests were declared.

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34. DRAFT UPPER TUESLEY DEVELOPMENT BRIEF SUPPLEMENTARY PLANNING DOCUMENT – CONSULTATION (Agenda Item 14)

- 34.1 The Committee received a report advising Members that the draft Upper Tuesley Development Brief Supplementary Planning Document (SPD) was currently out for public consultation and attached the document to the report.
- 34.2 The intention of the document was to set out a clear framework for the future development of the site, including specifying the quantum of development, resolving transport issues and highlighting key design standards to which a future planning application would be assessed. It took into account the development constraints of the surrounding site, including access and transport. It was anticipated that the consultation would result in a number of responses related to those issues.
- 34.3 Although Members considered this to be a comprehensive consultation and welcomed the number of affordable houses planned for the development, there were very strong concerns regarding access and transport, especially via Tuesley Lane. There were also concerns regarding the footpath access from Portsmouth Road and Milford Station and a suggestion that provision for a community bus service might be included in the developers brief.
- 34.4 A Transport Assessment was planned for the site which would consider the traffic impact of the development, and any planning application would need to consider the access arrangements for the site. However, the Committee wished their concerns to be noted regarding the viability of the development without specific improvements to the transport infrastructure.

RESOLVED that the observations regarding access and transport be passed to the Executive:

Appendix C

- Full summary of consultation responses, by subject area

Topic Area	Comment	Response
Policy	The vision for the site appears to be policy led rather than led by the site and its surroundings.	The framework of the SPD must consider the site and its surroundings in the context of the latest planning policy.
	The timing of the consultation was ill-conceived due to the publication of NPPF.	The contents of the National Planning Policy Framework (NPPF) have been considered, and the document updated to reflect this most recent guidance. References to the old PPG's and PPS's has been removed. It is considered that the SDP is in compliance with the guidance contained within the NPPF.
	Waverley open to challenge given the publication of the NPPF.	
	NPPF now published and should be considered.	
	NPPF not fully understood when draft SPD published, therefore the SPD is out of date and inaccurate.	
	Pages 8, 9, 10, 11 and part of 12 are now obsolete.	
	Pages 8 – 14 and 35 are now out of date:	
	Planning Policy Statements now abolished.	
	Pages 8 and 12 – the green belt is now covered by NPPF paras 79 – 92.	
	Page 8 – Local Plan policies will be superseded within 12 months unless updated.	
	Page 9 – PPG2 no longer in effect.	
	Page 9 – Housing policy needs to be readdressed in light of NPPF.	
	Page 11 – NPPF overtakes local plan chapter on movement and every development needs a travel plan.	
	Page 35 – PPS3 no longer subsists.	
	Need to address paras 36 – 41 of NPPF.	
The NPPF does not materially change the transport considerations of this site.		
Sustainable Transport Options do not meet criteria set out in NPPF.		
Waverley must put forwards an interpretation on sustainable development and invite further comment.		
	Pragraph 215 does not mean that the policies of the Local Plan are superseded, only that due weight should be given to them according to their degree of consistency with the NPPF. In this case it is considered that Policy RD6 is consistent with the NPPF.	
Policy RD6 no longer applies and PPG2 has been superseded.		
	Regarding the SHLAA, the site was included in resonse to the fact that the site is likley to come forward for housing, given what the Local Plan and subsequent development briefs say. Its inclusion in the SHLAA does remove the requirement for the site to be considered through the normal planning application process.	
The SHLAA did not assess the sustainability of the site so should be disregarded.		
Page 13 refers to the Core Strategy, housing numbers for Waverley and that Upper Tuesley has been identified in the SHLAA. This should be expanded to explain why it has been included above other sites with less environmental impact.	The site was included in the SHLAA on the basis that the principle of redevelopment is already accepted in the Local Plan and subsequent development briefs.	
Principle of development	Support affordable housing, support housing on the site, but not the additional traffic and not 120 units.	Noted.
	Support the development of the site, especially as it has become an eye sore.	Noted.
	The draft plans are well thought through and clear.	Noted.
	Glad to see something finally being done with the site.	Noted.
	The Council should be looking at ways of preserving these areas and not building on them.	This is a brownfield site and the principle of redevelopment is accepted in current planning policy.
	The document just supports the fact that the site is unsuitable for housing development.	Comment noted.
		As the site has been identified as a Major Developed Site within the Green Belt, the principle for development (subject to meeting certain criteria) has been established. However, this is one of only two sites within Waverley covered by Policy RD6 - the other being the IOS Site in Wormley which has already been developed. Given this, and the fact that each planning application should be considered on its own mertis, it is not considered that the development of this site would create an undesirable precedent.
Concern that this would set a precedent for further local development.		
Consultation		Over 1,200 letters were sent to local residents, a formal notice (in accordance with the regulations) published in the Surrey Advertiser on 2 March 2012 and a number of press releases issued (which were also carried in the local press). The Waverley website was also contained significant information.
	Consultation not widely publicised – more needs to be done.	
	Hospital/Virgin Health, Hall Hunter Partnership/Tuesley Farm, Surrey Link, Parish Councils, local schools were not consulted.	Milford Hospital, Tuesley Farm, the Friends of Milford Hospital and all the local Parish Councils were consulted.
	Natural England should be consulted.	Natural England were consulted and have responded.
		The location of the exhibition was determined by the availability of a venue. A variety of locations were considered (including in Busbridge), but they were all unavailable. The Clockhouse in Milford was an excellent venue and it is estimated that over 75 people attended the exhibition over the three days.
	The exhibition should have also been located in Busbridge.	
	No doubt the views of the residents will be manipulated to what is trying to be achieved.	Every individual response will be publically available to view (in addition to the summaries)
Believe that this is a <i>fait accompli</i> , just a matter of how big and when.	The principle of the development has been established through Policy RD6 of the local plan. The SPD is intended to inform the detail of whatever development takes place on the site.	
Would like to know the tendering procedure for any company or group appointed to conduct the consultation.	The consultation was undertake by Waverley Borough Council.	

Topic Area	Comment	Response
Transport Methodology	Need a coherent plan to deal with the transportation issues before this proposal progresses. The traffic assessment needs to be redone and then the whole brief reassessed and subjected to a further consultation.	A full transport assessment (TA) will be produced for the site for to support the development proposals. This will deal with all transportation issues, building on the SPD principles and Strategic Transport Study . The TA will support a future planning application for the site. The full TA will be available for comment during the consultation period of the planning application.
	Satisfied that the comments made during the evolution of the Transport Study have been incorporated (except where raised below).	Noted.
	Calculation/methodology for supporting 120 units is flawed as the hospital never generated significant traffic due to its specialist use.	The calculations are based on the traffic that the hospital could generate within the limits of its existing lawful use. SCC have advised they are satisfied with this approach and this has been used to determine the maximum development size.
	If January is not normally considered a representative month, why way the survey undertaken then?	The survey was undertaken in order to provide trip input into the Sustainable Transport Options study produced in February 2012. SCC have confirmed they are satisfied with this approach for the purpose of this study. Further traffic data will be collected as part of a full TA.
	The traffic count should have been taken on a normal day to reflect normal conditions and not when there was an incident on the A3.	Whilst there was an unexpected incident on the A3, this is expected to have led to higher than normal flows and therefore the traffic count should be considered robust.
	The police have no knowledge of an incident on 12 January 2012 when the survey was undertaken.	Noted.
	Trip rates are unrealistically low and therefore flawed. Waverley has more traffic than other areas and the areas identified are unlikely to reflect the Upper Tuesley site.	The trip rates have been taken from the TRICS® trip rate database in line with TRICS good practice. TRICS is the national standard system of trip generation and analysis in the UK and Ireland, and is used as an integral and essential part of the Transport Assessment process. The trip rates used were agreed with SCC.
	The site is not 'edge of town' but more isolated. Would contend that that traffic generation would be higher than what suggested.	Edge of town/suburban is the most appropriate option contained within the TRICS trip rate database. The development is not considered free standing, which is the only other possible option, due to it being surrounded by the hospital and other business developments and being on the edge of Godalming/Milford.
	The 550 daily trips identified will be concentrated at peak times (morning and afternoon) when the roads are already at capacity. This is at variance with a hospital use where the trips would be spread throughout the day.	It is noted that the trips will be concentrated at peak times. There will be a slight variance in the number of hospital peak trips to that of the site and we will take one away from the other to determine the difference. The full TA will assess the capacity of local junction and provide mitigation where necessary.
	Trip rates, surely 5.318 multiplied by 70 dwellings is 372 not 361?	Correct, noted and amended in both documents.
	The 551 trips should not be double counted as it expresses the remaining hospital potential and the proposed new housing.	The 551 is based on the surplus part of the hospital only.
	The times taken to drive from the site to various locations appear to be underestimates.	A number of journeys were undertaken to determine the drive times and the figures presented in the document are average figures and therefore not underestimates. They do not represent very congested time periods.
	The current Transport Study does not adequately respond to the transport difficulties along Tuesley Lane.	The Sustainable Transport Options study has explored a number of options for managing traffic on Tuesley Lane.
	The traffic assessment is incomplete because: Limited extent of the traffic surveys. Accident data is limited. Speed data is limited.	The Strategic Transport Options study focused on Tuesley Lane which is key concern for local people. The full TA will also deal with wider transportation issues. This full TA document will be agreed with SCC.
Traffic	Volume of traffic already unacceptable. Additional traffic will only add to the problem and the roads will not cope (especially at peak times).	The development proposal needs to mitigate traffic impacts. A full package of transport proposals will be designed to mitigate the impacts of the Upper Tuesley development. This is inline with Government Guidance contained in Circular 02/2007 and Guidance on TA (DfT)
	There has been a significant recent increase in traffic from: * commercial vehicles using the area (from Tuesley Farm) * the expansion of Godalming College	The full TA will include current traffic volumes and make allowances for any extant planning permissions.
	The following area already have traffic problems at peak hours: * Brighton Road * Holloway Hill * Shackstead Lane	Noted - the TA will explore these roads in Godalming.
	Tuesley Lane is unsuitable for large amounts of two-way traffic.	Noted, but the Sustainable Transport Options study has suggested development mitigation measures to mitigate this effect. These and others will be considered in greater detail in the full TA.
	In combination with other proposed developments, Godalming will become gridlocked.	A full TA will be produced for the site and this will deal with all transportation issues. This document must consider all relevant committed developments within the local area. This document will be submitted as part a future planning application.
	Issue of the construction period and construction traffic using the local roads at peak times.	There are options for the construction traffic which will be considered in greater detail as part of a future planning application. In addition if an EIA is required, this matter will be investigated there.

Topic Area	Comment	Response
Mitigation Measures	No factual analysis is provided to show that transport design measures and S106 agreements will mitigate the additional traffic.	The final measures to be included within the full TA will be designed to mitigate the impacts of the Upper Tuesley development. This is inline with Government Guidance contained in Circular 02/2007.
	Do not object to the combination of mitigation options, but on their own they will not solve the transport problem. They will only move the problem elsewhere.	The measures are designed to mitigate the impacts of the Upper Tuesley development. The mitigation measures will not solve all local transport problems. This is inline with Government Guidance contained in Circular 02/2007.
	Many of the proposed mitigation measures will be difficult to enforce.	Only fully enforceable measures will be chosen.
	Preventing future occupiers from travelling north along Tuesley Lane is unrealistic as this would add a substantially to driving distances.	Noted. Appropriate and sensitive mitigation measures will be provided to mitigate the impacts of the Upper Tuesley development on the local network and encourage the use of appropriate routes.
	Tuesley Lane (north) is of unique character and should not be changed or widened.	Appropriate and sensitive mitigation measures will be provided to mitigate the impacts of the Upper Tuesley development on the local network. In practice this will mean measures are design to blend in with the local character.
	Need for speed limits to be amended along Station Lane/Road (currently national speed limit).	Noted - this will be review at full TA stage.
	Speed limit point is academic as cars cannot drive at national speed limit due to the design of Tuesley Lane (north).	Traffic calming could be used to manage traffic speeds on the southern section of Tuesley Lane. This is to be further investigated within the full TA.
	Consideration should be given to widening Shackstead Lane (previously planned some years ago).	Appropriate and sensitive mitigation measures will be provided to mitigate the impacts of the Upper Tuesley development on the local network.
	The junction of Station Road to Church Road in Milford needs to be considered as part of the plans (possible roundabout).	This junction will be considered as part of the full TA and additional traffic surveys will be undertaken
	Additional danger of the railway crossing at Milford Station needs to be considered, especially if encouraging children to walk to school.	Accident analysis will be undertaken along Station Road to determine if there is any existing issue regarding the railway crossing.
	Do not support the plan to make Tuesley Lane one way.	Noted.
	Disappointed that the one way system has been rejected as this would prevent it being used as a 'rat-run'. Could it change direction at peak times?	Appropriate and sensitive mitigation measures will be provided to mitigate the impacts of the Upper Tuesley development on the local network.
	Support the northern access moving as shown in Option 14 (figure 9), but only being restricted access for emergency vehicles, cycle and pedestrians only".	Noted.
	Routing traffic through the development and restricting access on Tuesley Lane is not helpful to those who would occupy the site.	Noted. This option is not favoured.
	Mitigation option 9 should read that the footpath goes under the railway line and not over.	Noted. There is an existing underpass.
	Page 27 of the SPD – conflicts. Who would buy these much needed homes given the limitations on access and transport proposed.	The proposed development will be serviced by an appropriate level of transport and this will be fully tested at the planning application stage.
	Page 34, Concept O6 – the plan should be updated to include the likely pedestrian and cycle route connections to be provided to the north and south of the site/Tuesley Lane.	Noted.
	Additional mitigation measures should include:	<p>These ideas are noted. A full TA will be produced for the site and this will deal with all transportation issues. This document will be submitted as part of a future planning application.</p> <p>The associated development measures will be designed to mitigate the impacts of the Upper Tuesley development. The mitigation measures will not solve all local transport problems. This is inline with Government Guidance contained in Circular 02/2007.</p>
	A 20mph speed limit along Tuesley Lane through Busbridge down Shackstead and Holloway.	
	Traffic lights at the north exit of the site and the junction with Quatermile Road to discourage vehicles from using the road.	
	Toll on all traffic using Tuesley Lane.	
	Parking in Busbridge limited to 2 hours (including Shackstead Lane).	
	Removal of all parking along Brighton Road and restoration to a two-way road.	
	Traffic calming at one or two key points in Pullman Lane (promised as part of the Admiral Way development but never delivered).	
	Permanent barrier across Tuesley Lane at the north.	
	Traffic calming proposals should be extended beyond the junction of Minster Road to Park Road and include areas around the college.	
	A new road from the site to Portsmouth Road should be considered and subsidised by the development with some money coming from the public purse.	
	Suggest that the development should have more houses on the field adjacent to the hospital (Woods Farm – outside the boundary of the site) to facilitate a new road from Tuesley Lane to Portsmouth Road. With 700 houses this proposal would be financially viable.	
	Parking on the road should be retained for staff	
	10% of parking spaces should be reserved fro disabled persons within the hospital grounds.	
There should be a 20mph speed limit along Upper Tuesley Lane.		
A traffic light system on Tuesley Lane should be considered and included as an option.		
Consider a cycleway along footpath 161.		
The footpath from the site, along Tuesley Lane and towards the station should be upgraded to accommodate cycles.		
The public footpath from the site to the station (direct link) should be upgraded to a bridleway.		

Topic Area	Comment	Response
	Consideration should be given to make Tuesley Lane (north) only available to buses, pedestrians, cyclists and horse riders (except for access to Tuesley Manor).	
	Footpath should be extended between Tuesley Lane and Water Lane (farm side of Station Lane).	
	Tuesley Lane (north) should be widened to allow two cars to pass if the scheme is to go ahead.	
	Highways improvements should include a safe crossing point and length of footpath to reach the bus stop. The footpath also needs upgrading.	
Footpaths	Roads are already dangerous and footpaths inadequate	This opinion is noted.
	Pedestrians already used Tuesley Lane (north) which is very dangerous.	Noted.
	Unrealistic to expect residents to walk into Godalming.	Whilst unlikely to be a high proportion of residents walking into Godalming, some may choose to do so.
	Need to ensure that the public access in the vicinity of the development is enhanced as part of the development.	Noted.
	Footpath 161's surface should be sensitively upgraded between the station and Tuesley Lane (possibly with low level lighting).	Noted.
	It is undesirable to upgrade footpath 161 (paved surface and lighting) as this would be detrimental to the rural setting.	Noted.
	Footpath 161 should be connected to footpath 167 with an upgraded surface.	Noted.
	Need to improve cycle provision (and in part for equestrian use) from the site to the station via Tuesley Lane and Station Lane.	Noted.
	Track from Springwood Cottage to Milford Station is designated a footpath and not a bridleway and therefore not available for use by bicycles.	Noted.
	Footpath 167 to Portsmouth Road difficult to pass, but relied upon to access the local bus stop (although unlikely to be used). It is unlikely this could adequately be upgraded and its location is incorrect in the brief.	Noted.
	There should be a proper assessment of the crossing points over the A3100 for pedestrians trying to reach the bus stop.	In the event a rural lane is provided to the A3100 a proper assessment of crossing points would be undertaken.
	No footpath from Minster Road to the field opposite the Convent.	Noted.
	Tuesley Lane (at Ashstead Lane/Minster Road) is very difficult to cross.	Noted. It is not clear why this is a problem given that the existing sightlines appear to be good. Accident analysis will be undertaken along Tuesley Lane to determine if there are any existing safety issues.
	Footpath along Rake Lane is dangerous and unlit.	Noted. Accident analysis will be undertaken along Rake Lane to determine if there is any existing safety issues and this will be included in the full TA.
Page 16 – the spur of the footpath off the footpath from the site to the station is not a public footpath.	Noted. The relevant plan will be updated.	
Support cycle route and footpath improvements.	Noted.	
Bus Services	The bus service is poor and likely to be reduced – this isn't accurately represented in the document (neither is the recent SCC review). A regular bus service to the site is a prerequisite of any plan. The community bus should be greatly extended.	Noted. The local bus routes have recently changed and current bus routes and timetables will be considered in more detail as part of the full TA. The SPD and Sustainable Transport Options study will be amended.
	Even if a bus service were provided by a developer, the cost would be substantial and it is likely to be abandoned soon after the development was to be complete.	Noted - longer term bus viability will be a consideration.
	There is no regular bus route within a 10 minute walking distance of the site. This is underestimated and should be accurately reflected in the brief.	Noted. Bus routes and timetables will be considered in more detail as part of the full TA.
Train	Godalming Station is approximately 4 miles away if you don't use the northern section of Tuesley Lane.	Noted.
	Many commuters are likely to drive to Godalming to use the fast train to London – is there sufficient car parking to accommodate them?	The full TA will determine the likely number of people wishing to travel by train. The supply of local car parks are likely to determine which stations get used by residents.
	The train services from Milford to London (at peak times) are already full or over capacity (as is the car park). This is no acknowledged in the draft.	Noted, however observation indicates that (from Milford, Godalming and Farncombe to London) the train is not totally full at during the peak hours.
Northern Entrance	The northern entrance to the site commences at the start of the adjacent footpath and not further round then bend as shown on the plans. This is used as a vehicle access and should not be prejudiced by future development.	Noted and incorporated in the brief.
	The proposed northern access should be for entrance to the site only, but ideally only have one access to the south.	Noted. This will be considered as part of the full TA.

Topic Area	Comment	Response
Car Parking	Concerned that there will be a serious accident on the single track section of Tuesley Lane, especially as this is also used by pedestrians and cyclists..	Noted.
	An average of 1.5 car parking spaces per dwelling is not sufficient. Where will cars park on the development?	The SPD will reflect the emerging guidance being produced by Waverley Borough Council. Cars should be sensitively and realistically designed into the scheme and not considered as an afterthought.
	Pages 11 and 42 relating to car parking should reflect the current guidance contained within SCC document "Vehicular and Cycle Parking Guidance" published January 2012. Consideration should also be given to the National Planning Policy Framework (NPPF).	Updated as requested
	Over-spill and visitor spaces should be sensitively provided.	Agreed. The car parking provision on site should be realistic and follow the emerging guidance.
	No provision has been made to relocate the staff car parking (25 spaces) to the hospital or elsewhere on the site.	This is a landowner matter, where the PCT should approach the HCA directly. This is not an issue for planning or the SPD to resolve.
	Vital that the NHS car parking is not compromised because of limited facilities provided to future residents.	Noted.
	Page 44 (image) the text should read that SCC's car parking recommendations are now guidance rather than standards.	Updated as requested.
Other Transport	Full support the development subject to resolution of transport issues.	Noted.
		The point related to reliance on the car is accepted. However the SPD and any future planning applications for development should demonstrate how alternative methods could be promoted (for example through the upgrading of local footpaths and cycle ways).
	This is a very <i>green</i> "brownfield site", meaning that future residents are likely to rely on the car (for services such as schools, doctors, shops, employment etc.).	This is a brownfield site and the assessment of future uses must take into account the potential traffic generation from the current use of the land.
	Most vehicles will turn north to access Godalming, rather than go the long way round.	Noted - mitigation measures will be provided to deter this movement as much as possible.
	Transportation chapter of the Godalming Healthcheck is relevant and accurately explains the traffic problems and transport issues.	Noted - this will be reviewed and where necessary considered as part of the full TA.
	A reference is needed to the Sustainable Transport Options document. No Strategic Transport Assessment was listed in the supporting documents.	A Sustainable Transport Options study was produced to support the proposed SPD, this is different to a STA which will be a requirement for a future planning application. Further links will be made from the SPD to the Sustainable Transport Options study.
	Positive action should be taken to encourage cycling.	Agreed. A variety of measures have been proposed to encourage cycling.
	Unless a "Home Zone" is specifically sought, the phrase should be substituted.	Amended.
	Page 40 amend to read "...for pedestrians and cyclists through the site running either alongside or close to the main spine route. Any design would be low key in terms of signage..."	Amended.
	Page 44 should be amended to be more generic "...including both the site accesses and local junctions on the surrounding highway network, including those at Tuesley Lane / Station Lane and Portsmouth Road / Church Road / Station Road in Milford. Any analysis would be expected to be undertaken using up to date modelling techniques. An assessment should also be..."	Amended.
Green Belt	The development would result in the loss of open countryside, playing fields, woodland and wildlife habitat.	This is a brownfield site where the principle of redevelopment is accepted. The key issue will be ensuring that what is proposed on the site does not adversely affect the openness of the Green Belt.
		The SPD seeks to provide a framework to support Policy RD6 (and in conformity with the NPPF). The document sets the parameters so that future development should not impact on the openness of the Green Belt (and the purpose of including land within it) or the setting of the adjacent listed building. However, this is a detailed consideration that can only be fully undertaken at the planning application stage.
	Impact on the openness of the greenbelt (at northern end) and setting of adjacent listed building.	The site has been identified as a Major Developed Site within the Green Belt and as such development is acceptable subject to conformity to the relevant criteria.
	As part of a protected area the site should not be developed.	Noted.
	Acceptance that this is a previously developed site within the greenbelt.	
	Should extend the site to increase development but compensate for this in improving other sites within the greenbelt.	The extent of this Major Developed Site was determined by Policy RD6. It would be unacceptable (in Green Belt terms) to increase the extent of the site for additional development. In addition the emerging Core Strategy clearly explains that the preference is to focus new development on previously developed land.
Temporary buildings should not be included within the 8,000 sqm footprint limit.	The NPPF (para 89, point 6) explains that development of this type would be acceptable if it would not have a greater impact on the openness of the Green belt and the purpose of including land within it than the existing development. The 8,000 sqm did not include temporary buildings, but did include buildings that have since been demolished.	

Topic Area	Comment	Response
	The nurses home should not be used as a precedent for the height of development on the site. The precedent should come from the single storey buildings. Concern is expressed that this will extend to three storeys.	What actually gets built in terms of height, footprint and location will be strongly influenced by the NPPF requirement that the development should not affect the openness of the Green Belt (see Para 89 point 6).
Affordable housing	What is affordable housing?	A definition has been added to Page 36.
	Welcome 40% affordable housing on site. This should be a minimum requirement and not a target.	The 40% is a minimum target which exceeds the Local Plan requirements and is in line with the emerging Core Strategy.
	Need family housing with long leases.	Part of the affordable mix will be larger family homes. The terms and length of the tenancy agreement will depend on the affordable housing provider.
	At least 5 units should be ring-fenced for Hall Hunter staff.	Hall Hunter staff will be eligible to apply for the affordable homes, alongside other households in housing need. The merits of each application will be judged on the individual circumstances of each household, in line with the Council's Allocation scheme.
	Impact on marketability of non-affordable housing.	This site triggers a requirement for affordable housing to be provided on site, in line with all other qualifying sites in the borough which is consistent with Government and Council policy.
	The 'rented' accommodation brings the risk of unsociable elements. Could create a 'Sink Estate'.	All residents in the affordable homes will have a tenancy agreement with the affordable housing provider acting as their landlord who will also have an antisocial behaviour policy. A breach of this tenancy agreement by an individual can ultimately result in the loss of their home.
	"Pepper potting" and the ratio proposed will not work.	The precise location and way of distributing the affordable housing has not yet been fixed and would be part of a detailed planning application.
	Commuted sums should be sought to provide social housing in a more appropriate location.	The Council only accepts commuted sums in very exception circumstances, where it is not possible to provide the affordable housing on site, in line with Government Policy and the Council's Local Plan. The same criteria are applied as to whether the site is suitable for private market or affordable housing residential use, regardless of tenure.
Alternative use	The brief should consider alternative options.	See below.
	Innovative housing for the elderly should be considered (including bungalows, sheltered housing, retirement village etc.) which would reduce impact on the road network.	Waverley's preferred use for the site is residential.
	Fewer executive homes.	
	It should only provide the 48 affordable houses.	
	Tuesley Farm workers could be accommodated on the site and this should be investigated further.	The principle of development was established in the Local Plan 2002 and is compliant with the NPPF.
The site should not be developed - The buildings designated dangerous and no longer used should be demolished so that the site can be restored to its former use prior to the 1930's.		

Topic Area	Comment	Response
Design	Pleased to see a reduction in numbers from previous schemes.	Noted.
	Strongly support the aspiration for a high quality development.	Noted.
	Size of the proposal is unsuitable for its location.	This opinion is noted. What actually gets built in terms of height, footprint and location will be strongly influenced by the NPPF requirement that the development should not affect the openness of the Green Belt.
	A density of 30dph is inappropriate and would result in over 350 houses. A development of 50-100 units is more appropriate.	Given the location of the site, an approach to development based on a 'flat' 30 dph over the entire site is not appropriate. In addition the constraints of the site and surrounding infrastructure would not support a scheme of 350 units. A proposal of this type is also unlikely to accord with the NPPF criteria associated with Green Belt. The proposal for 120 dwellings has resulted from the transportation considerations. The site has also been tested (through the concept plans) to ensure that this amount of development can fit on the site, be accommodated within the 8,000 sqm footprint constraint and also accord with the criteria set out in the NPPF and Policy RD6.
	Page 9 suggests that 50% of the units will be two bed or less and 80% should have a maximum of three beds. This means there will be a predominance of small units, which is unsuitable for the site.	This relates to Policy H4 of the Local Plan and its associated SPG (2003). Whilst the Policy is explicit in its requirements (and the starting point for consideration), the SPG clarifies that there may be exceptions to this requirement where "a convincing case is made that the dwelling size and/or density requirements are incompatible with local character or other constraints.". Any diversion from Policy H4 will need to be tested and justified in a future planning application. It will also be necessary to take account of any more recent evidence of the mix/type of housing required.
	The masterplan should not be 'landscape-led'. More weight should be given to renewable energy creation, layout and orientation.	The scheme will take account of renewable energy creation, layout and orientation as part of the fundamental principles which guide urban design. A paragraph re. orientation has been added to the sustainability section. As the site is a major developed site within the Green Belt it is appropriate that landscape plays a major part in the masterplan in maintaining the openness of the site. The level of open space is also dictated by the restrictions on floorspace
	One of the major characteristics of a Surrey village is that there is always a village green at the centre for the community. This is lacking from the concept statement.	A village green has always been shown on the plan, however it was not explicitly referred to as 'the village green'. This has been amended on the plan on page 33 to make this clear.
	The design of the new development should be carefully considered where the hospital has a full presence within the new development.	The development's relationship to the hospital has been carefully considered, which has led to development being shown up to the boundary. This means that any unsightly 'backs' of the hospital can be addressed through backing new dwellings onto it so as to complete the blocks, and where appropriate new dwellings can front onto routes through to hospital to provide active frontage. It may also be appropriate in places to face development onto the hospital itself. This will be addressed at the detailed design stage, which forms part of a future planning application
	Looks like a hideous housing estate.	The SPD does not include detailed plans of any future proposed development (that is for a future applicant). The photos included have been used to demonstrate specific elements rather than the architectural/design approach to the scheme.
	Will there be children's play areas?	Yes. Children's play areas will be a requirement for a development of this size. This is reflected on page 39.
	Could a large car park be designed so that the development proper is car-free?	The provision of a large car park would impact on the openness of the site and would reduce the amount of green space in the site.
	Housing for life should be addressed in the plans.	The SPD requires that the development meet a minimum Building for Life standard of silver - across the whole scheme not just the affordable houses (see Page 38).
	Cycle parking should be provided on-site for both residents and visitors.	Agreed, this should be sensitively designed into the scheme. Page 46 (Transport) explains that the development should provide safe and accessible cycle storage.

Topic Area	Comment	Response
Retention of Buildings Onsite	The water tower should be retained and converted into a new use.	The Council has no preference for whether the water tower is retained or not. The plan on page 26 will be amended to reflect this.
	Water tower is an eyesore – do not retain it, it serves no purpose.	See point above.
	What buildings have been identified as being of local interest?	English Heritage have visited the site and determined that none of the buildings are of national significance and are therefore not listed. However they did express the view that some of the buildings might be of local interest. However, this does not mean that they should be retained. The plan on page 26 indicates the buildings that are to be demolished.
	The existing buildings should be converted into a productive new use.	This is not always possible or viable. Many of the existing structures have a substantial amount of asbestos incorporated within them, some are not structurally sound, and it would involve considerable cost to bring them up to a decent standard for conversion to an alternative use. However, in the long term it would be for the developer to decide whether to retain them or not.
	It would be difficult to make the existing buildings energy efficient.	Noted and agreed.
Environmental	Welcome concept of protecting and enhancing existing habitats including the link from north to south.	Noted.
	Full ecological surveys are needed including surveys for protected species (including bats, for buildings, structures and trees).	Agreed. These will form part of an Environmental Impact Assessment (if necessary), are a validation requirement (as part of the Biodiversity Survey and Report) and form a material planning consideration.
	The design of new buildings should consider biodiversity enhancements.	The emerging Core Strategy includes Policy CS17 which says that on undesignated sites we expect new development, where appropriate, to contribute to the protection, management and enhancement of biodiversity.
	Reference should be made to the need for a flood risk assessment, the use of Sustainable Drainage Systems and the need for surface water drainage systems.	Agreed. This the Flood Risk Assessment is a validation requirement and will be added to page 49.
	Development should avoid the floodplain at the southern end of the site.	Agreed and wording amended.
	The development brief should acknowledge the protected status of the groundwater beneath the site.	Amended.
	An Appropriate Assessment is required.	Agreed, this has been commissioned and will support the adoption of the SPD.
	Need to bring together "Nature Conservation" and "Site Landscape" to form a section on "Site Landscape, Habitats and Biodiversity".	Amended.
	References: * The two SNCI should be named (Lady well Wood and Shadwell Stream Copse). * The Surrey Revised Ancient Woodland Inventory should be referenced as "A revision of the Ancient Woodland Inventory for Surrey, June 2011". * The Surrey Biodiversity Plan should be referenced as the Surrey Biodiversity Action Plan.	Noted, the document will be updated.
	Surprised that a Strategic Environmental Assessment (SEA) has not been undertaken. Will one be carried out? Natural England and Environment Agencies advice has not been followed with regard to this.	Whilst an SEA was deemed to not be necessary to support the production of the SPD, an Appropriate Assessment has been commissioned. In addition any future planning application will need to be screened to ascertain whether an EIA is required (this is likely for 120 units).
Contamination not mentioned (e.g. asbestos, oil in the groundwater etc.)	If an EIA is required, contamination will be considered. In any event, contamination is a material planning consideration for a future planning application.	

Topic Area	Comment	Response
Sustainability	More detail is required for sustainability measures proposed (water, energy etc.).	The SPD will require all homes to conform to Code Level 4 of the Code for Sustainable Homes, meet the silver standard of Lifetime Homes and also achieve at least 10% of the predicted energy generation from renewable energy sources. As the SPD provides a framework for future development, it would be unreasonable to specify the exact measures that should be incorporated. This would come forward as part of a future planning application and be subject to relevant planning conditions.
	The development is not in a sustainable location due to lack of supporting infrastructure (public transport, reduced reliance on the car etc.). The brief suggests it is more sustainably located than it actually is.	There are particular circumstances in this case that make the site suitable for development. Namely that it has been identified as a previously developed site within the Green Belt (brownfield land) with existing use rights. Additional links have been made within the Transport Chapter to the Sustainable Transport Options study.
	Expectation that majority of journeys will be car based – this should be reflected in the document.	It is accepted that there will be additional car movements on the road over and above the number now (excluding the consideration of the old hospital). However, the fall back position is that the former hospital buildings could be brought back into use without planning consent. This would generate a similar level of traffic to the proposal.
	Page 45 – delete section about “highly insulated homes overheating in the summer”, this is inaccurate. Development Brief adequately deals with economic and environmental elements of sustainability. It needs to address the social issues relating to schools, travel, shopping and associated impact on the aspiration for 40% affordable housing.	Advice from a sustainability consultant suggests that there is a risk of highly insulated homes overheating in summer. Whilst it doesn't happen in every home and not every summer, the design of the future development should aim to reduce the risk. Page 45 has therefore been left as it was regarding this topic
		Noted. Please refer to the relevant sections above and below.
Landscape	Specimen trees should be retained (including ancient woodland), the orchard maintained and new trees planted.	A full tree survey and arboricultural implications assessment is a validation requirement of any future planning application. At this framework stage it is difficult to pinpoint specific trees for retention or removal. Page 39 refers to trees and acknowledges that some may be lost, but the higher quality trees should be retained wherever possible. This will be a consideration of any future planning application.
	Difficult to see how wildlife connections can be made when 120 houses proposed.	Refer to the plans on pages 30 and 33. A continuous green link will be provided through the centre of the site connecting to the existing belts of woodland to the north and south. East-west connections are provided across the site, plugging into the existing green corridor on the western edge of the site.
	Concern at the potential loss of trees as a bat habitat (conflict on page 25).	A Biodiversity Survey is a validation requirement of any future planning application. In addition this will also be a consideration of an Environmental Impact Assessment.
	Significant light pollution will result from the development.	Noted. The Landscape, Open Space and Trees Section will be updated to ensure light pollution is considered. Pollution, including light pollution is a material planning consideration which will be taken into account in any future planning application (see also NPPF Para 125).
	The environment around the hospital needs improvement.	Accepted. The aspiration that the site subject to this SPD will be improved, which in turn will benefit the setting of the hospital.
	The southern ancient woodland, stream and orchard should transfer to an organisation such as the Surrey Wildlife Trust to be protected in perpetuity.	This will be a consideration as part of any long term management strategy for the site, and one that rests with the land owner. A planning permission can impose a requirement to maintain a woodland or other natural area, where justified, but cannot dictate who should undertake that task.
	The ecological features need to be carefully protected in the design and throughout the construction of the development.	Agreed.
	Provision is required for the long term management and maintenance of the landscape. A Landscape and Visual Impact Assessment should be carried out to ensure no adverse impact on the surrounding countryside.	This is considered on page 41 - 41. The specific details of this will be subject to relevant planning conditions and/or through a legal agreement supporting any future planning permission. Agreed. This would form part of an Environmental Impact Assessment that would support any future planning application.

Topic Area	Comment	Response
Drainage & Sewage	No consideration given to disposal of sewage and previous problems associated with the main pipe blocking and leaking.	Any developer will be required to liaise with the relevant utility companies to provide the necessary connections, including any improvements needed to achieve this. In addition a Foul Sewage and Utilities Assessment will be required to make any future planning application valid.
	Road drains in Station Lane/Road are inadequate.	It is understood that there is an existing issue with regard to road drains on Station Lane/Road. Having discussed this with SCC, the new development is unlikely to have any significant impact on this. However, SCC do have a responsibility to maintain the drains. They will be made aware of this comment. More generally the SPD does mention drainage on the site itself and a future planning application will need to consider this in more detail.
Schools	Report ignores the impact on local schools.	Surrey County Council has been consulted and has provided feedback which will be incorporated into the document under Chapter 10 Planning Obligations. In essence, planning contributions will be required to increase local capacity.
	Local schools already over subscribed.	See point above.
	Existing residents cannot send their children to the local infant school / first choice of school.	See point above.
	No modelling of the age demographics of potential residents has taken place – so how can a discussion about local school capacity issue have taken place. The provision of new junior and secondary school provision should be a precondition.	Surrey County Council have considered the proposal and based their comments on the information currently available. This will be refined as the housing mix is established (through a future planning application). However, Surrey County Council raise no object to the potential for this number of dwellings on education capacity grounds. See point above.
Health	Issue with local capacity at Doctors surgeries.	Evidence obtained for the Infrastructure Delivery Plan suggests that there is currently a slight underprovision of GP's within Milford and Witley. However additional growth may potentially require additional GP services. Whilst this is a material planning consideration, it attracts limited weight. In essence it is market demand that will facilitate extra provision.
	Increased provision should be provided in advance of development.	See point above.
Hospital	The peace and tranquillity of the hospital must be protected.	Noted. However, the site surrounding the hospital has (since 2002) been identified for residential provision. It is accepted that there may be some impact on the hospital during the construction phase.
	The development should contribute to improvements at the hospital.	This is a matter for the PCT.
	Pedestrian and emergency services access to the hospital should not be compromised.	Agreed.
	The existing rear access to the hospital (for emergency vehicles) should be retained and upgraded.	This is not a planning matter but a landowner matter.
	The electrical substation on the HCA land serves the hospital. Mains drainage from the hospital should not be compromised.	This is not a planning matter but a landowner matter.
	Not enough thought given to the impact on Milford Hospital. Milford Hospital is surrounded by the site, not adjacent to it.	The development's relationship to the hospital has been carefully considered, which has led to development being shown up to the boundary. This means that any unsightly 'backs' of the hospital can be address through backing new dwellings onto it so as to complete the blocks, and where appropriate new dwellings can front onto routes through to hospital to provide active frontage. It may also be appropriate in places to face development onto the hospital itself. This will be addressed at the detailed design stage, which forms part of the planning application Noted. Page 5 updated to reflect this.

Topic Area	Comment	Response
The Crescent		<p>Agreed. This decision not to be specific about the Crescent was taken because there are wider landownership and tenancy issues that need to be resolved outside of the planning system. However, from a planning/design perspective there are two clear approaches:</p> <p>1) The Crescent remains and integrated into the site, or 2) The Crescent is demolished and the houses replaced.</p> <p>Either approach can be accommodated on the site without detriment to the general concept shown on Page 34.</p> <p>The section within the Site Appreciation has been updated to accommodate the two approaches, but is clear that neither approach is preferred by WBC.</p> <p>For clarity, the adoption of the SPD does not impact on any landownership or tenancy matters that fall outside of the planning system.</p>
	The Crescent is not suitably addressed in the document.	See point above,
	It is portrayed in a very negative light even though these are residents' homes.	This is a landowner and tenant matter, and not one for the SPD.
	What will happen to the residents?	This opinion is noted.
	The Crescent is distinctive and fits with the landscape.	No they are not identified as being of local historic interest and would not be worthy of being identified as Buildings of Local Merit.
	Are they of local interest?	This opinion is noted.
	They are not poor quality buildings and have been maintained to a high quality	Noted. Photograph(s) of the Crescent will be added to the relevant section of the document (considered above).
	Why aren't there any photographs of the Crescent within the document?	This opinion is noted.
	Leaving residents in these properties would accord with the "Lifetime Home" ambition.	Agreed - Page 15 to be updated. The plan on Page 34 does not include any of the buildings with the potential to be retained, but is a conceptual plan showing the location of development (new or retained buildings).
	Page 15 should refer to the Crescent and the plan on page 34 should include it.	Please refer to the point above. The Crescent will be addressed within the SPD and the options (retain or demolish) will be identified.
Support the redevelopment of the site but the Crescent should be retained.		
Other matters	Site boundaries appear to intrude into the access and the garden of Springwood Cottage, Summer Lane (SW corner).	It is understood that there is a land ownership dispute in this area. This is not a planning matter.
		This is a material planning consideration which would be looked at in greater detail at the planning application stage. Saved policy D13 of the local plan and the NPPF both consider infrastructure.
	Are the utilities able to support a development of this size (gas, electric, broadband etc.)?	With regard to broadband, there is no specific requirement that it is provided on site, but the NPPF (Section 5) encourages support of a high quality communications infrastructure.
	Godalming is in danger of losing its identity given the amount of development proposed in the area.	This is a brownfield site and its development will be subject to the requirement not to affect the openness of the Green Belt. Not considered, therefore, that it would affect the identity of Godalming.
	Full archaeological survey required.	If an EIA is required, this would form part of it. However this is also a material planning consideration.
	The scheme should include some community facilities such as a village shop.	As with other forms of planning obligation, contributions may be required towards the improvement of local community facilities.
		The plan on page 19 indicates the height (in storeys) of each of the buildings on site.
	The table of buildings (pg 20) should include number of storeys and whether they are worthy of retention.	English Heritage have visited the site and determined that none of the buildings are of national significance and are therefore not listed. However they did express the view that some of the buildings might be of local interest. However, this does not mean that they should be retained. The plan on page 26 indicates the buildings that are to be demolished.
	Neither of the documents addresses the existence of Busbridge Lake on Tuesley Lane. Under the Reservoirs Act 1978 and Flood and Water Management Act 2012, it is necessary for access to be maintained in both directions at all times, unhindered and whereby emergency vehicles can access if necessary.	Noted.
	Waverley have a serious responsibility in ensuring that the Godalming Angling Society is supported in its ability to undertake its requirements under the relevant legislation. Failure to do so could result in WBC and its officers bearing responsibility.	Noted.
HCA should be treated in the same way as any other landowner.	Agreed.	

Topic Area	Comment	Response
	General amendments required.	<p>Page 28 remove first line "In accordance with the advice in PPG2, Annex C... RD6). Sentence to start "The developable..."</p> <p>Page 35 relating to PPS3 should be removed and replaced with relevant section of NPPF (GL HEARN??)</p> <p>Page 39 under Play Space "Waverley Borough Council's PPG17 study" should be replaced with "Waverley Borough Council's Open Space, Leisure and Recreation Study."</p> <p>Page 42 - A Strategic Transport Assessment (STA)..." should be removed and replaced with "A Sustainable Transport Option Study has..."</p>