

JOINT PLANNING COMMITTEE TECHNICAL BRIEFING
10TH JUNE 2013

Applications subject to public speaking.

Background Papers

Background papers (as defined by Section 100D(5) of the Local Government Act 1972) relating to this report are listed under the "Representations" heading for each planning application presented, or may be individually identified under a heading "Background Papers".

The implications for crime, disorder and community safety have been appraised in the following applications but it is not considered that any consideration of that type arises unless it is specifically referred to in a particular report.

A1	WA/2012/1592 Homes & Communities Agency 08/10/2012	<u>Outline application for demolition of existing buildings and redevelopment of land adjoining Milford Hospital, Tuesley Lane to provide 104 new (Class C3) residential units, works to 12 existing residential units (The Crescent), works to Allison House and staff cottages to provide 4 (Class C3) residential units and access. This application is accompanied by an Environmental Impact Assessment (EIA) at Land Adjacent To Milford Hospital (Upper Tuesley), Tuesley Lane, Godalming GU7 1UE (as amended by bat and dormice surveys received 11/12/2012, email dated 30/1/2013 and 23/05/2013, plans received 01/03/2013, 06/02/2013 and 08/02/2013 and letters dated 07/12/2012 and 18/01/2013 and additional information received 21/05/2013 and 23/05/2013).</u>
Committee:		Joint Planning Committee Technical Meeting
Meeting Date:		10 th June 2013
Public Notice		Was Public Notice required and posted: Y
Grid Reference:		E: 496150 N: 141854
Parish:		Busbridge/Witley
Ward :		Bramley, Busbridge and Hascombe Milford
Case Officer:		Mrs H Hobbs
16 Week Expiry Date		27/01/2013
Neighbour Notification Expiry Date		16/11/2012
Neighbour Notification Amended/Additional Expiry Date		13/06/2013

NOTE: This Briefing Note has been prepared prior to the Technical Briefing Meeting on 10 June 2013 to inform Councillors about this major planning application. The Note does not comment on the overall acceptability of the scheme. This would be inappropriate at this stage, primarily because the Technical Briefing Meeting, like a Members' site visit, is part of the information gathering process and not a decision-making meeting. The debate on the merits of the development and the issues raised can only take place when officers can present a full analysis and their recommendation at the Planning Committee.

Contents

1.0 Introduction page 2

2.0 Site Description page 4

3.0 Proposal page 5

4.0 Relevant Planning History page 12

5.0 Planning policy Constraints 12

6.0 Development Plan Policies and proposals page 13

6.0 Guidance page 14

7.0 Summary of Consultation responses and Parish Council Comments page 15

8.0 Representations page 47

10.0 Principle of development 63

Annexe 1 Summary of transport mitigation projects submitted on 21/05/2013.

Introduction

The planning application seeks outline permission for the development proposal with all matters reserved for future consideration except for access. As such, the applicant is seeking a determination from the Council on the principle of the proposed residential development and associated access. If outline permission is granted, the details of the proposal would be submitted subsequently under "reserved matters application" which will be appearance, landscaping, layout and scale.

The Upper Tuesley site (land adjacent to Milford Hospital), which forms a redundant part of the Milford Hospital site, was part of a large portfolio of NHS properties that were identified as surplus and were transferred to English Partnerships through the Hospital Sites' Programme in 2005. English Partnerships became part of the Homes and Communities Agency (HCA) on the 1st December 2008. The HCA is the national housing and regeneration agency for England. The HCA combines the land and property expertise of English Partnerships, the Housing Corporation's track record of delivering affordable homes and the Academy for Sustainable Communities' knowledge of creating and renewing high quality places.

The site is located off Tuesley Lane, between the village of Milford and the town of Godalming, and lies adjacent to Milford Hospital, an operational stroke

rehabilitation hospital in the ownership of the Surrey Primary Care Trust (PCT). The PCT element of the site will remain operational for the foreseeable future. The area declared surplus to the PCT's requirements extends to 12.8 hectares. It contains 16 existing dwellings together with a three storey former nurses' accommodation of approximately 925 sqm and a range of mainly single storey buildings extending to some 4,560 sqm and some 1,030 sqm storage and workshop space. The majority of the buildings still standing are in poor condition and await demolition.

The Upper Tuesley site lies in a rural area within the Metropolitan Green Belt, about 2 km (1.25 miles) to the south of Godalming Town Centre. There are footpath links from the site into Godalming to the north and to Milford Station approximately 0.5 miles to the south west. The site is relatively flat. However, it becomes steeply sloping on the southern boundary. It is currently accessed from Tuesley Lane which is an unlit road, running roughly north south between Godalming and Milford.

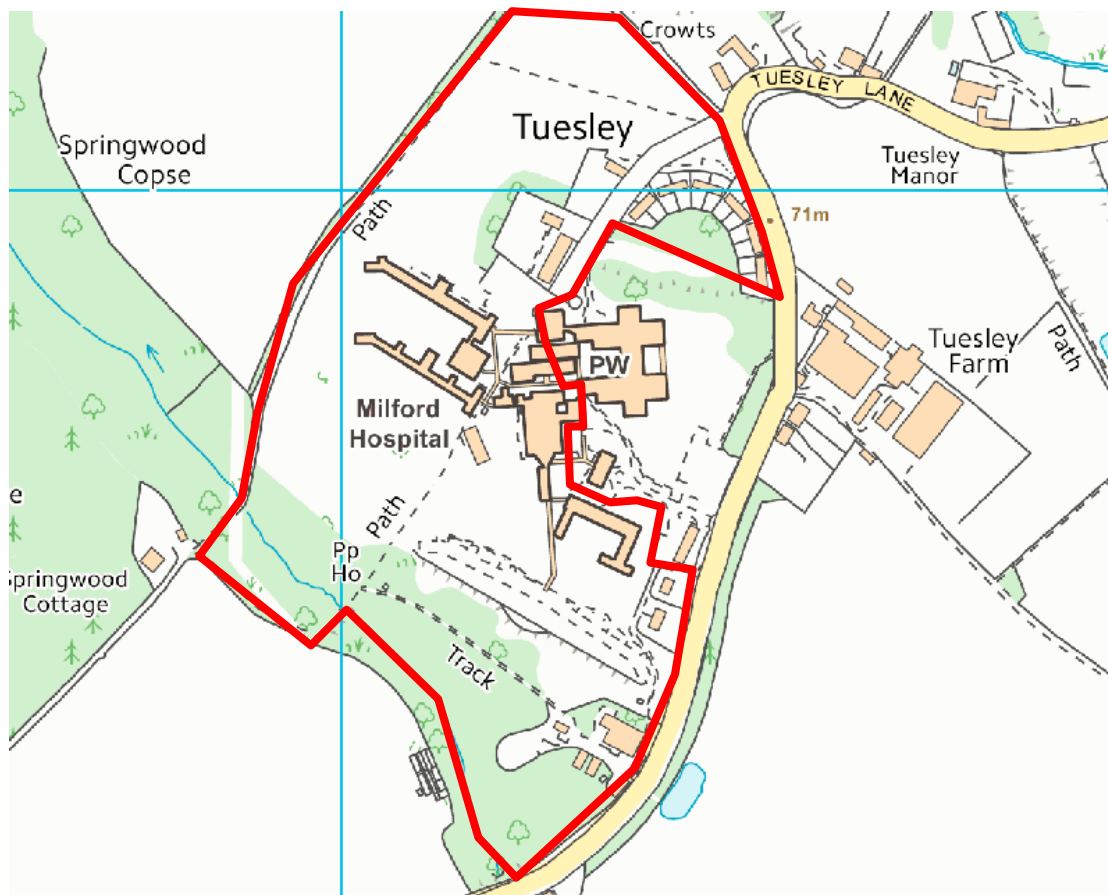
Milford Hospital opened in 1928, and the earliest part of the hospital dates from this time, with supplementary buildings added in the 1970s and 1980s. The hospital complex was originally constructed as a specialist chest hospital, but the virtual eradication of tuberculosis-related diseases led to its conversion into a specialist day surgery and elderly persons' rehabilitation unit. Those operational changes have resulted in a gradual reduction in the suitability and need for the site's long-stay recuperation wards.

In the last 25 years, a number of the original long-stay wards have been demolished. As recently as 1995, a large block located on the southern edge of the complex was removed. Some of the vacant staff houses on the Tuesley Lane frontage have also been demolished, most recently in 1997, whilst many others elsewhere on the site, lie vacant, including two substantial blocks of nurses accommodation. The purpose-built PCT elderly persons' rehabilitation unit was opened in 1985 on the site of the original ward.

The site is not within a Conservation Area and none of the buildings have statutory listed status nor do any appear on WBC's list of buildings of local merit. However, English Heritage has stated that the site could be of local importance and therefore some buildings could be deemed to be undesignated heritage assets. Twelve semi-detached cottages, known as the Crescent, are located on the north-east corner of the site and are occupied.

The surrounding area comprises active agriculture (including a large soft fruit farm), residential locations and small towns and villages which cater for the daily needs of the local population.

Location Plan



Site Description

The site is located on the western side of TUESLEY LANE between Godalming and Milford and comprises land declared surplus to the requirements of the Primary Care Trust (PCT) to the north, east and south of Milford Hospital, which will remain for the foreseeable future as a hospital. The site extends to some 12.8 ha and includes 16 existing dwellings together with a three storey former nurses' accommodation of approximately 925 sq. m and a range of mostly single storey buildings extending to some 4,560 sq. m and some 1,030 sq. m. of storage and workshop space. The majority of the existing buildings are in a poor state of repair.

Vehicular access to the site is at the north eastern end of the site from TUESLEY LANE. The hospital has a separate vehicular access although the northern access is used by ambulances as an access to a parking area currently used by staff and by The Hoppa Bus.

The site includes an open grassed area in the northern part of the site, a belt of trees in the north eastern part, The Crescent of twelve existing dwellings to the north east, former hospital buildings in a poor state of repair, an old orchard in the south eastern part of the site and an area of woodland in the southern part of the site either side of a stream.

There is a public footpath (Public Footpath 161) from Milford Station, the route of which crosses the stream near the south western corner of the site and follows the western boundary of the site before changing direction and crosses the grassed area of the site to join Tuesley Lane close to the existing northern access from the site to Tuesley Lane. There is also public footpath (public footpath 167) along the northern boundary of the site which links Tuesley Lane with Portsmouth Road.

To the north of the site there are residential properties fronting Tuesley Lane and a wooded area designated as a Site of Nature Conservation Importance (SNCI).

To the west of the site are a field and woodland. To the east, beyond the area retained for the hospital, are Tuesley Farm House and the farm buildings as well as a number of cottages. Tuesley Farm is a soft fruit farm and its land also extends to the south of the application site.

The northern part of the site is a relatively flat area of grassland. To the south and south east are the majority of the redundant buildings on the site. The application form gives the gross internal floor space of these buildings as 6191.9 sq. m.

There is a crescent of houses known as The Crescent comprising 12 semi detached dwellings in the north eastern corner of the site. These dwellings will be retained. Land immediately to the south of these dwellings is included in the application site.

The southern part of the site includes terraces and slopes in a southerly direction towards an area of ancient woodland and the tributary of the River Ock which is at the southern end of the site.

Within the site there is not only an area of ancient woodland but also mature trees concentrated in the centre of the site and an old orchard (to be retained) towards the south western corner of the site.

Proposal

Outline planning permission is sought for the demolition of existing buildings and redevelopment of land adjoining Milford Hospital, Tuesley Lane to provide 104 new (Class C3) residential units, works to 12 existing residential units (The Crescent), works to Allison House and staff cottages to provide 4 (Class C3) residential units and access and diversion of Public Footpath 161 Busbridge. The application provides details of the access but all the other

matters (appearance, landscaping, layout and scale) are reserved for future consideration.

At the time of submission and in accordance with Articles 3 and 4 of the Town and Country Planning (Development Management Procedure) (England) Order 2010 (DMPO) required that where layout is a reserved matter, the application for outline planning permission shall state the approximate location of buildings, routes and open spaces included in the development proposed; and, where scale is a reserved matter, the application for outline planning permission shall state the upper and lower limit for the height, width and length of each building included in the development proposed. The DMPO has since been amended to alter these requirements but they were in force at the time of submission.

The applicant has submitted illustrative plans detailing that the proposed dwellings would be constructed in a cluster formation served by a central spine road, which would traverse the site from the proposed access point at the southern corner of the site to the proposed access point at the northern corner.

The applicant has stated that the scale parameters of the proposed dwellings would be between 5m and 9m in width, 7m and 20m in length and between single storey and three storeys in height.

The application proposes that 48 of the total of 120 dwellings will be affordable; this figure includes the existing 12 dwellings in the Crescent.

The application submission includes:-

- Design and Access Statement;
- Environmental Assessment;
- Environmental Management Plan;
- Extended Phase 1 Habitats Survey;
- Parameter plans for land use, buildings to be demolished, building height, transport and movement and open space;
- An illustrative Masterplan;
- Planning Statement;
- Flood Risk Assessment;
- Open Space Assessment;
- Transport Assessment;
- Affordable Housing Statement;
- Consultation Statement;
- Sustainability Statement;
- Arboricultural Development Statement;
- Heads of terms / draft S.106;
- Summary of transport Mitigation projects submitted 21/05/2013

The proposal would include the following details:

- Of the total of 120 dwellings on the site 40% (48 dwellings) would be affordable housing. This figure includes the existing 12 dwellings in The Crescent which would be affordable.
- Average density would be 18.5 dwellings per ha.
- The form of housing would vary across the site to provide a range of sizes, types and tenure.
- High quality architecture would be encouraged;
- Affordable housing would be indistinguishable from market housing.
- Affordable housing would be pepper potted across the site.
- A mix of heights is proposed ranging from single storey to three storey.
- Areas of open space would be provided on the site including a swathe of space through the centre of the site incorporating a Local Equipped Area of Play (LEAP) and the retention of the orchard and ancient woodland at the southern end of the site.



Illustrative layout for proposed development



Plan showing existing and proposed footpaths. The existing footpaths follow the western and northern boundaries of the site.

The applicant has been in negotiation with officers concerning the terms of a legal agreement. The draft heads of terms are as follows:

An agreed heads of terms has now been produced and whilst this has not been signed the terms proposed are as follows:

Benefit	Contribution
Education (Primary)	£266,354
Education (Secondary)	Not required as there are no capacity issues in Godalming
Libraries	£19,069.76

Playing pitches	£50,783.60
Equipped and casual play space	The applicant is providing a Locally Equipped Area of Play (LEAP) on site.
Sports / leisure centres (improvements to Godalming Lawn Tennis Club adjacent to Godalming Leisure Centre) has been specifically identified as requiring contributions	£67,573.28
Community facilities –	Discussions are continuing with the applicant regarding provision of a bus service. Members will be updated on this matter at the meeting.
Recycling	£6,840.24
Environmental Improvements	The applicant has agreed to provide public art and interpretation boards on the site and will be restoring the existing orchard.
Transport	<p>Original Scheme: Highway Works to be agreed between the applicant and Surrey County Council Highway Authority to include:</p> <ul style="list-style-type: none"> • Station Lane/Church Road junction capacity and pedestrian safety improvement scheme, comprising dedicated left and right turn lanes on Station Lane and pedestrian crossing west of the junction. • Pedestrian safety scheme between Milford Station and Rake Lane/Station Lane junction comprising; <ul style="list-style-type: none"> ○ Provision of footway on south side of junction ○ Pedestrian crossing facility (dropped kerbs and tactile paving) on Station Lane. • Station Lane/Tuesley Lane traffic management improvements comprising: <ul style="list-style-type: none"> ○ Shared footway for pedestrians and cyclists between the site and Milford Station. ○ Speed Limit Review on Station Lane and Tuesley and implementation of new speed limits. ○ Localised carriageway narrowing on Tuesley Lane and associated lining and signage.

	<ul style="list-style-type: none"> ○ Removal of parking bays on Tuesley Lane. • Tuesley Lane (north of northern vehicular access). Safety scheme on bend in carriageway, comprising: <ul style="list-style-type: none"> ○ Provision of anti-skid surfacing ○ Gateway feature with associated safety signage. • Provide environmental enhancements on Tuesley Lane comprising the removal of parking bays on Tuesley Lane to the south of the hospital's vehicular entrance and exit and upgrading of the existing informal parking on the west side of Tuesley lane, to the north of the hospital entrance and exit, to provide a lay-by with formal parking bays. <p>Amended Scheme: Please refer to Section on s278 works in following section.</p>
<p>The setting up of a Management Company to implement a submitted Landscape Management Plan and Management Plan</p>	<p>To ensure the future management of the site through strict adherence to the Management Plan and Landscape Management Plan. This shall be a written scheme which demonstrates the method by which the land be maintained and financed so as to fulfil the following objectives:</p> <ul style="list-style-type: none"> • To ensure that each lessee of the Development pays a reasonable service charge for the maintenance and management of the land. • To ensure that sufficient funds are raised from time to time to ensure that the requirements of the Management Plan are fully funded and thereafter adhered to. • To provide a means by which the Council may verify compliance with the Management Plan.
<p>Affordable Housing</p>	<p>48 Dwellings to be provided as Affordable Housing and comprising Shared Ownership Units and Affordable Rented Units.</p>
<p>Improvements to existing Footpaths and the existing bus-stop on Portsmouth Road</p>	<p>£133,270 to go towards improvements to the existing bus stop on Portsmouth Road and the improvement of existing designated Footpaths 161, 167 and 39 and the formal diversion of Footpath 161 to the satisfaction</p>

	of Surrey County Council Rights of Way.
Network Rail	£25,000 towards the improvement of the existing level crossing at Station Lane.

Amended Scheme

The applicant has provided an additional report “Land Adjacent to Milford Hospital (Upper Tuesley) – Summary of Transport Mitigation Projects” in which detailed information is provided on the proposals for a comprehensive package of measures to be provided as mitigation to enhance highway safety, manage traffic capacity and encourage the use of public transport, walking and cycling. A copy of the document is attached as Annexe 1. The applicant has confirmed that the additional traffic proposals will not impact on any of the matters discussed in the landscape and Visual impact Assessment due to the minor nature of the works. The following measures are proposed:

Project	Description of Section 278 Works
Church Road/ Station Lane	Station Lane/Church Road junction capacity and pedestrian safety improvement scheme, comprising dedicated left and right turn lanes on Station Lane and pedestrian crossings to the west of the junction
Rake Lane	Pedestrian safety/traffic management improvements on Rake Lane, comprising: <ul style="list-style-type: none"> • Rake Lane speed limit review/implementation of new speed limit • Pedestrian safety/traffic management measures between Rodborough School and the Rake Lane/Station Lane junction • Provision of footway on the south side of Rake Lane/Station Lane junction • Pedestrian crossing facility (dropped kerbs and tactile paving), south of the Rake Lane/Station Lane junction
Station Lane/ Tuesley Lane (south)	Station Lane/Tuesley Lane (southern section) traffic management improvements, comprising: <ul style="list-style-type: none"> • Shared footway for pedestrians and cyclists between the site and Milford Station • Speed limit review on Station Lane and Tuesley Lane and implementation of new speed limit • Localised carriageway narrowing on Tuesley Lane and associated lining and signage to discourage through traffic • Parking bays formalised on Tuesley Lane outside the existing hospital
Tuesley Lane (north)	Northern section of Tuesley Lane (between northern site access and Minster Road), comprising: <ul style="list-style-type: none"> • Speed limit review and implementation of new

	speed limit • Traffic management and safety measures • Provision of anti-skid surfacing on bend adjacent to northern site access and associated safety gateway feature
Project	Description of works to be carried out as part of Section 106 Planning Obligations
Portsmouth Road – southbound bus stop	Bus shelter, timetable case/flag/pole, accessibility improvements and real time passenger information
Portsmouth Road – northbound bus stop	Bus shelter, accessibility improvements and real time passenger information
Portsmouth Road crossing	Informal pedestrian crossing island
Footpath 39/167 to Portsmouth Road	General improvements to footpath 39/167 to include improvements to the surface.
Footpath 161	General improvements to footpath 161 to include improvements to the surface.

Relevant Planning History

WA/2001/0529	Outline application for the redevelopment of site with the erection of 125 new dwellings together with associated vehicular access, landscaping and means of enclosure following demolition of certain existing buildings.	Withdrawn 06/12/2001
WA/2000/0446	Outline application for the redevelopment of site with the erection of approximately 150 dwellings together with associated works following demolition of certain existing buildings.	Withdrawn 21/03/2001
WA/1998/0101	Construction of new car park and installation of low lying bollards (as amended by plans and letter dated 20/03/98).	Full Permission 14/04/1998

Planning Policy Constraints

Major Developed Site
 Green Belt – outside defined settlement area
 Public Footpaths 161 and 167

Potentially Contaminated land
 Flood zone 2
 Flood zone 3
 Ancient Woodland
 Wealden Heaths I SAC 2km buffer zone
 Wealden Heaths I SPA 5km buffer zone

Development Plan Policies and Proposals

Policies of the Waverley Borough Local Plan 2002:-

D1	Environmental Implications of Development
D2	Compatibility of Uses
D3	Resources
D4	Design and Layout
D5	Nature Conservation
D6	Tree Controls
D7	Trees, Hedgerows and Development
D8	Crime Prevention
D9	Accessibility
D13	Essential Infrastructure
D14	Planning Benefits
C1	Development in the Green Belt outside Settlements
C3	Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value
C7	Trees, Woodlands and Hedgerows
C10	Local Nature Reserves, Sites of Nature Conservation Importance and Regionally Important Geological and Geomorphological Sites
C11	Undesignated Wildlife Sites
HE15	Sites and Areas of High Archaeological Potential
H4	Density and Size of Dwellings
H10	Amenity and Play Space
IC12	Working from Home
CF1	Retaining Existing Community Facilities
CF2	Provision of New Community Facilities
HE8	Conservation Areas
LT11	Walking, Cycling and Horse Riding
RD6	Major Developed Sites
M1	The Location of Development
M2	The Movement Implications of Development
M4	Provision for Pedestrians
M5	Provision for Cyclists
M9	Provision for People with Disabilities and Mobility Problems
M10	Public Transport and Interchange Facilities
M14	Car Parking Standards

Policies of the Local Development Framework pre-submission Core Strategy:-

CS1	Location of Development
CS2	The Amount and Location of Housing
CS3	Sustainable Transport
CS4	Infrastructure and Community Facilities
CS5	Affordable Housing
CS7	Housing Type and Size
CS13	Leisure, Recreation and Cultural Facilities
CS15	Landscape Character
CS16	Townscape and Urban Design and the Heritage
CS17	Biodiversity and Geological Conservation
CS19	Sustainable Design and Construction
CS20	Renewable Energy Development
CS21	Flood Risk Management

Since the meeting of the JPC on 20th March 2013 the South East Plan has been revoked.

The Council is preparing its Core Strategy setting out the key strategic planning policies for the area up to 2028. The Council agreed the proposed pre-submission version of the Core Strategy at its meeting on 17th July 2012 and it was published for consultation on 16th August 2012. The Council approved the Core Strategy for submission on 22nd January 2013 and it was formally submitted for Examination on 31st January 2013. The Examination Hearings are scheduled to take place in June 2013. As it stands only limited weight can be given to the emerging Core Strategy. However, this will increase as the Core Strategy progresses through Examination.

On the 27th March 2012, the Government published its National Planning Policy Framework (NPPF). Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all applications for planning permission to be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The Waverley Borough Local Plan 2002 and the South East Plan 2009 therefore remain the starting point for the assessment of this proposal.

The NPPF is, however, a material consideration in the determination of this case. Paragraphs 214 and 215 of the NPPF make clear that where a local authority does not possess a development plan adopted since 2004, due weight may only be given to relevant policies in existing plans according to their degree of conformity with the NPPF.

Guidance:

- The National Planning Policy Framework (2012)
- Upper Triesley (land adjacent to Milford hospital) Development Brief (July 2012)
- Technical Guidance to the National Planning Policy Framework (2012)
- Surrey County Council Vehicular and Cycle Parking Guidance (2012)

- Waverley Borough Cycling Plan SPD (2005)
- Draft Waverley Borough Council Parking Guidelines (2012)
- Planning Infrastructure Contributions SPD (2008)
- Density and Size of Dwellings SPG (2003)
- Surrey Design Guide (2002)
- Strategic Housing Land Availability Assessment (2010) and update (2011)
- Strategic Housing Market Availability Assessment (2009)
- Affordable Housing Viability Assessment (2009) Addendum 2010 and update 2012
- Strategic Flood Risk Assessment (2010)
- Technical Note: Transport Measures to support growth Identified in the Waverley Borough Core Strategy 2012
- Climate Change Background Paper (January 2011)
- Interim Position on Infrastructure Delivery Plan (January 2011) IDP 2012
- Waverley Borough Council Open Space, Sport and Recreation (PPG17) Study 2012
- Draft Settlement Hierarchy 2010 and factual update 2012
- Reaching Out to the Community – Local Development Framework- Statement of Community Involvement – July 2006

Consultations and Town/Parish Council Comments

<p>County Highway Authority Original Scheme (Note these comments do not cover the revisions submitted on 21/05/2013. Updated comments from the County Highway Authority will be reported orally to the meeting)</p>	<p><u>Informative Note for LPA Case Officer and Applicant:</u></p> <p><u>1. Relevant Local and National Policy:</u></p> <p><u>Original Scheme:</u></p> <p>National Policy: The National Planning Policy Framework (2012) acknowledges that transport policies have an important role to play in facilitating sustainable development, however it also recognises that opportunities to maximise sustainable transport solutions will vary from urban to rural areas. The Highway Authority is satisfied that the proposed package of transport mitigation measures does improve accessibility to the site by non-car modes of travel, therefore the planning application does meet the transport sustainability requirements of the National Planning Policy Framework.</p> <p>Local Policy: The Upper Tuesley Development Brief SPD established the principle of residential development on this site and laid out what would be required should any planning application be submitted. The original Transport Assessment (TA), and subsequent revisions, have established to the satisfaction of the Highway Authority that the proposed development is in accordance with the requirements of the SPD and the relevant Local Plan policies.</p>
---	--

2. Existing and Proposed Traffic Generation:

The site has a lawful C2 planning use and this is a material planning consideration that the Highway Authority has to recognise when assessing the transport impact of the development proposal. It is normal practice to discount vehicle trips that could be generated by a lawful use of a site, from the vehicle trips that could be generated by the proposed development. Any net increase in trips is then used to assess the impact on the local highway network. In this instance, because of residents' concerns, the Highway Authority has ensured that the methodology used in the TA is particularly robust and realistic;

- The existing trip generation is based on the volume of existing redundant hospital buildings located on the site, which equates to 8,000sqm or 40 hospital beds and a 100 bed staff nursing home. The Highway Authority has not accepted for example, a private hospital C2 use on which to base the existing trip generation, given this use could generate more than 2000 two-way vehicular movements per day. It is important to note that the existing use of the site has the potential to generate this number of vehicular movements without the need to obtain planning permission. The Highway Authority therefore cannot question the viability of this site operating under its lawful use.
- The existing and proposed trip generation assessments are based on trip rates obtained from the TRICS database. The Highway Authority has assessed the assumptions used by the applicant to calculate the trip rates and is satisfied that they provide a realistic comparison to the application site.
- It is normal practice for any development to consider the amount of traffic that the site can generate without the need for planning consent. If the existing redundant hospital buildings were brought into use as 40 hospital beds and a 100 bed staff nursing home, a certain level of traffic would enter and leave the site and use the local road network. The Highway Authority has compared this existing potential trip generation with the proposed residential trip generation, during the peak AM (8:00-9:00) and PM (17:00-18:00) periods on the local highway network. This assessment shows that the development once constructed could create an increase in traffic flows (23 vehicles) in the morning peak hour and an increase in traffic flows (44 vehicles) in the evening peak hour, when compared to the likely C2 use detailed above. It has been previously established in the Upper Tuesley Development Brief SPD, that the daily traffic

generation for the proposed residential development should not exceed the daily trip generation for the existing lawful use. The assessment of the daily trip generation shows that the existing lawful use (8,000sqm or 40 hospital beds and a 100 bed staff nursing home) could generate 570 daily trips and the proposed residential use could generate 571 daily trips.

- The DfT document 'Guidance on Transport Assessment' advises that the existing traffic flows should be taken into account when estimating the potential changes to traffic using the site. In this instance, within the context of the volume of traffic on the surrounding highway network, the increase in trips in the AM peak would be marginal and in the PM peak could have a slight impact on highway safety and capacity. An assessment on this basis would have given the Highway Authority limited scope to secure a comprehensive package of highway mitigation measures. In contrast, the approach agreed with the applicant was to undertake a transport assessment that provided a worst-case scenario for the residential C3 use. This scenario assumes that the site does not have an existing lawful use, therefore the proposed trip generation figures have not been discounted to account for any existing potential trip generation. The methodology used to assess the impact of development traffic on the local highway network is therefore very robust, and has enabled the Highway Authority to secure a comprehensive package of transport mitigation measures.

3. Development Traffic Distribution:

The applicant has assumed that 20% of traffic will access the site via the northern section of Tuesley Lane. The applicant states that this distribution is based on 2001 Census journey to work distribution data for the Milford Ward. The Highway Authority has undertaken sensitivity analysis on this distribution assumption, using data obtained for other Godalming wards. Based on this analysis the Highway Authority does consider that the 20% assumption is likely to underestimate the proportion of development traffic arriving and departing the site via Godalming.

The Highway Authority has assessed the impact of 40% of development generated traffic using the northern section of Tuesley Lane during the AM and PM peak periods, when background and development traffic flows are at their highest. It is considered that this 40% proportion of traffic travelling via the northern section of Tuesley Lane is a more realistic assumption. Analysis of the data using a 40% assumption shows that;

- In the AM peak period (8-9), existing background traffic volumes are 300 vehicles travelling north and only 30 vehicles travelling south on the stretch of Tuesley Lane north of the hospital. There is therefore a high degree of 'tidal flow' in the northerly direction. Development traffic in the AM peak would mirror this pattern, with 16 vehicles departing the site and 6 vehicles arriving at the site via the northern section of Tuesley Lane.
- The AM peak development trips would likely result in an average increase of 1 vehicle travelling northbound every 4 minutes and 1 vehicle travelling southbound every 10 minutes.
- In the PM peak period (17.00-18.00), existing background traffic flows are much lower than AM peak, with approximately 20 vehicles travelling north and 40 vehicles travelling south on the stretch of Tuesley Lane north of the hospital. As expected, the estimated development traffic generation would mirror the southerly tidal flow, with 17 vehicles arriving at the site and 10 vehicles departing the site via the northern section of Tuesley Lane.
- The PM peak development trips would likely result in an average increase of 1 vehicle travelling northbound every 6 minutes and 1 vehicle travelling southbound every 4 minutes.

Based on this analysis, the Highway Authority considers the impact of development traffic going north from the site could cause an inconvenience to highway users but would not have a severe impact on highway safety or capacity. It is accepted that the narrow alignment of this stretch of highway does disrupt the free flow of traffic, and on occasions vehicles have to reverse short distances to passing places to enable oncoming vehicles to pass, but this is an existing situation. There are no transport models available that can accurately model the capacity of single-track rural lanes. Recent preliminary research into the issue by Somerset County Council was inconclusive, but emphasised that capacity of these types of roads will vary significantly, with the tidal flow of traffic and number of passing places being particularly important factors. In this instance, given that development traffic in the peak periods would mirror the distribution of background traffic flow, and there are a number of stretches where vehicles can pass each other, it is not considered that that development traffic would severely exacerbate congestion on this stretch of highway. It is also worth noting that the review of the accident data shows no significant existing safety problems for this stretch of Tuesley Lane.

Development traffic in the peak periods travelling north into Godalming would quickly dissipate onto the surrounding highway network, continuing along Tuesley Lane towards Godalming town centre, turning right onto roads towards Busbridge or left along Shackstead Lane. It is acknowledged that queuing and delays already can occur on Shackstead Lane during peak periods. This is caused by on-street parking which narrows the width of the carriageway, restricting two-way movement in some places. Development generated traffic could have a marginal impact on the existing flow of traffic on Shackstead Lane, but it is not considered that development traffic would have a severe impact on highway safety or capacity.

4. Traffic Flow Data:

The Highway Authority has interrogated the applicant's traffic survey methodology and is satisfied that the data is robust for the purposes of assessing the impact of development traffic on the highway network. In particular, survey data from Church Road/Station Lane and Church Road/Portsmouth Road junctions was undertaken on 24 May, therefore taking account of the increase in movements associated with the Tuesley Lane fruit farm during the summer months. Tuesley Lane background traffic flows are significantly higher during the AM peak compared to the PM peak. The Highway Authority note that AM peak data for Tuesley Lane was collected on 10 January, when all schools in the area were fully operating, therefore it is considered that the level of background traffic surveyed is robust.

5. Cumulative Impact of Development:

The TA process does consider where appropriate the cumulative impact of development on the highway network, for development that is either subject to the planning consultation process or been granted planning permission. The planning application for 12 dwellings on Holloway Hill was refused planning permission by Waverley BC (WA/12/0548), so should not be considered in the TA. Notwithstanding this, a development of this scale would not normally be included in any cumulative impact assessment. Formal proposals for future development at Godalming College have not yet come forward, so it would not be reasonable for the Milford Hospital TA to consider the impact of that potential development. However, if the Godalming College development comes forward, their TA work would need to consider the traffic associated with the Milford Hospital Development.

6. Development Layout:

The Highway Authority will assess the internal layout of the site when details are submitted with any reserved matters application for the site.

7. Highway/Transport Mitigation Package:

It is important to note that the robust analysis provided by the developer has enabled the Highway Authority to secure a much more substantial package of Section 278 & S106 mitigation, than would strictly be the case had only the net increase in vehicular movements been considered.

The package of measures is mostly concentrated on the highway network south of the site, in recognition that 60% of development traffic would travel on the highway network south of the site. With regard to highway capacity, the modelling work demonstrates that development traffic would have a severe impact at the Station Lane/Church Road junction, therefore mitigation measures have been proposed at this location, to help alleviate congestion and improve safety for pedestrians. With regard to highway safety, it is likely that a significant proportion of children from the development would attend Rodborough School, therefore mitigation measures have been provided to improve safety for children walking/cycling to the school. It is important to note that the key sustainability improvement provided by the development is improving the cycling/walking link between the site and Milford Railway Station.

The highway mitigation package also seeks to reduce the existing level of background traffic using the northern section of Tuesley Lane. The TA work has shown that approximately 122 vehicles in the AM peak travelling north on Tuesley Lane is 'Through Traffic', using Tuesley Lane instead of the Portsmouth Road to travel between Milford and Godalming. The mitigation package therefore focuses on traffic management on Tuesley Lane/Station Lane, which will increase journey times on this route between Milford and Godalming, thereby making it a less attractive option for all traffic, particularly in the busier AM peak period. The highway works south of the site will therefore help to alleviate the impact of development traffic using the northern section of Tuesley Lane.

The mitigation package does provide for some traffic management improvements on the narrow northern section of Tuesley Lane, but it is important to note that opportunities to deliver major improvements on this narrow lane are very limited and would likely result in significant detriment to this historic rural lane. Specific details on the measures to be provided will

be finalised post any planning permission granted, but it is acknowledged they will need to be sympathetic to the unique character of the lane.

The Highway Authority considers the mitigation package will deliver the following improvements;

- Improve pedestrian safety at the Station Lane/Church Road junction and help alleviate the impact of additional development traffic on the operation of the junction.
- Improve pedestrian safety at the Rake Lane/Station Lane junction, particularly for school children by lowering the speed limit and providing a safe crossing point.
- Introduce traffic management measures, in consultation with Rodborough School, to improve safety for school children walking along Rake Lane.
- Provision of safe and attractive cycling/walking link between the application site and Milford Railway Station, making travelling by train to work a viable option for residents.
- Reduce attractiveness of Tuesley Lane being used as a through route between Milford and Godalming by reducing speed limits and thereby also improving safety.
- Improving safety at the bend in the carriageway adjacent to the northern site access, where the TA identified there is currently an accident 'hot-spot'.

The applicant is also providing a financial contribution towards passenger transport infrastructure and public footpath improvements, to encourage the use of public transport and walking by residents. The Highway Authority has considered that the scale of development proposed could not sustain a commercial bus service between the site and the surrounding areas. However, it is understood that the applicant will be making a financial contribution to the Waverley hoppa Community Transport Service.

Section 3 above details the robust approach the Highway Authority has undertaken to consider the impact of development traffic going north (left) from the site during the peak AM and PM periods. Development generated traffic is likely to have a marginal impact on the highway network south of Godalming town centre, which could cause inconvenience to highway users, but this impact is not considered to meet the tests for further works or financial contributions as set out in the National

Planning Policy Framework (2012).

Overall, in accordance with the requirements of the Upper Tuesley Development Brief, it is considered that the very robust transport mitigation package will preserve or enhance highway safety, help manage traffic capacity and encourage the use of public transport, walking and cycling.

The proposed development has been considered by THE COUNTY HIGHWAY AUTHORITY who :

recommends an appropriate agreement should be secured before the grant of permission to secure the following:

Section 278 Highway Works:

Before first occupation of the development the applicant shall provide the following highway mitigation measures:-

1. Station Lane/Church Road junction capacity and pedestrian safety improvement scheme, comprising dedicated left and right turn lanes on Station Lane and pedestrian crossing west of the junction.

2. Pedestrian Safety/Traffic Management Improvements on Rake Lane, comprising:

-Rake Lane speed limit review/implementation of new speed limit.

-Pedestrian safety/traffic management measures between Rodborough School and the Rake Lane/Station Lane junction.

-Provision of Footway on south side of Rake Lane/Station Lane junction.

-Pedestrian Crossing facility (Dropped Kerbs and Tactile Paving), south of the Rake Lane/Station Lane junction.

3. Station Lane/Tuesley Lane (southern section) traffic management improvements, comprising:

-Shared footway for pedestrians and cyclists between the site and Milford Station.

-Speed Limit Review on Station Lane and Tuesley Lane and implementation of new speed limit.

-Localised carriageway narrowing on Tuesley Lane and associated lining and signage to discourage through traffic.

-Removal of parking bays on Tuesley Lane outside the existing hospital.

4. Northern section of Tuesley Lane (between northern site access and Minster Road), comprising:

-Speed Limit Review and implementation of new speed limit.

-Traffic management and safety measures.

-Provision of anti-skid surfacing on bend adjacent to northern site access and associated safety gateway feature.

An index linked transport contribution of £133,270 payable prior to first occupation to deliver the following:

1. Improvements to bus stop infrastructure on Portsmouth Road, including pedestrian accessibility improvements.

2. Improvements to Public Rights of way No's. 39 & 167, between the site and bus stops on Portsmouth Road, and ROW No. 161 between the site and Milford Railway Station.

The Highway Authority also recommends the following conditions are imposed on any permission granted:

1 - Before any other operations are commenced the modified northern vehicular access to Tuesley Lane shall be constructed broadly in accordance with Parsons Brinckerhoff's Drawing No, Figure 4 Rev D, all to be permanently maintained to a specification to be agreed in writing with the Local Planning Authority and the visibility splays shall be kept permanently clear of any obstruction between 0.6m and 2.0m above the carriageway.

Reason: The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

Policy: Policy M2 of Waverley Borough Council's Local Plan 2002.

2 - Before any other operations are commenced the proposed southern vehicular access to Tuesley Lane shall be constructed broadly in accordance with Parsons Brinckerhoff's Drawing No. Figure 3 Rev. D, all to be permanently maintained to a specification to be agreed in writing with the Local Planning Authority and the visibility splays shall be kept permanently clear of any obstruction between 0.6m and 2.0m above the

	<p>carriageway.</p> <p>Reason: The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users.</p> <p>Policy: Policy M2 of Waverley Borough Council's Local Plan 2002.</p> <p>3 - The existing accesses from the site to Tuesley Lane made redundant by the development shall be permanently closed in accordance with details to be agreed in writing with the Local Planning Authority. All redundant sections of footway and kerbing shall be fully reinstated by the applicant, in a manner to be agreed in writing with the Local Planning Authority.</p> <p>Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users.</p> <p>Policy: Policy M2 of the Waverley Borough Council's Local Plan 2002.</p> <p>4 - No new development shall be occupied until space has been laid out within the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for cars to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. The parking/turning area shall be used and retained exclusively for its designated purpose.</p> <p>Reason: The above condition is required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users.</p> <p>Policy: Policies M2 and M14 of Waverley Borough Council's Local Plan 2002.</p> <p>5 - No development shall start until a Method of Construction Statement, to include details of:</p> <ul style="list-style-type: none"> (a) parking for vehicles of site personnel, operatives and visitors (b) loading and unloading of plant and materials (c) storage of plant and materials (d) programme of works including:- <ul style="list-style-type: none"> (i) measures for traffic management, and (ii) timing and delivery works required to construct the new accesses (e) provision of boundary hoarding behind any visibility zones has been submitted to and approved in writing by the Local
--	--

	<p>Planning Authority. Only the approved details shall be implemented during the construction period.</p> <p>Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users.</p> <p>Policy: Policy M2 of the Waverley Borough Council's Local Plan 2002</p> <p>6 - Before any of the operations which involve the movement of materials in bulk to or from the site are commenced, facilities shall be provided as must be agreed with the Local Planning Authority, in order that the operator can make all reasonable efforts to keep the public highway clean and prevent the creation of a dangerous surface on the public highway. The agreed measures shall thereafter be retained and used whenever the said operations are carried out.</p> <p>Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users.</p> <p>Policy: Policy M2 of the Waverley Borough Council's Local Plan 200.</p> <p>7 - No new development shall be occupied until space has been laid out within the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority to provide:</p> <ul style="list-style-type: none"> (a) Secure integral cycle parking for every dwelling. (b) Electric vehicle charging points in line with Surrey County Council's Parking Guidance. <p>Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users.</p> <p>Policy: Policies M5 and M10 of the Waverley Borough Council's Local Plan 2002.</p> <p>8 - Prior to the commencement of the development the applicant shall submit for the written approval of the Local Planning Authority a Travel Plan, based on Parsons Brinckerhoff's Framework Travel Plan August 2012 (amended January 2013), to include the provision of information to new residents and shall include the following items:</p> <ul style="list-style-type: none"> (a) A 'travel information leaflet' to be provided in the welcome pack for new residents when they move into their dwellings.
--	--

- (b) Provision of transport and travel information to residents (e.g. regular emails and/or setting up a web-based travel plan page for the site); and
- (c) Cycle purchase assistance vouchers.

The implementation of the travel plan and the ongoing provision of information and management of the travel plan web-page will be the responsibility of the site management company.

Reason: The condition above is required in order that the development should not prejudice highway safety, nor cause inconvenience to other highway users.

Policy: Policies M2, M5 and M10 of Waverley Borough Council's Local Plan 2002.

Highway Informatives:

1. Design standards for the layout and construction of access roads and junctions, including the provision of visibility zones, shall be in accordance with the requirements of the County Highway Authority.

2. Details of the highway requirements necessary for inclusion in any application seeking approval of reserved matters may be obtained from the Transport Development Planning Team of Surrey County Council.

3. Notwithstanding any permission granted under the Planning Acts, no signs, devices or other apparatus may be erected within the limits of the highway without the express approval of the Highway Authority. It is not the policy of the Highway Authority to approve the erection of signs or other devices of a non-statutory nature within the limits of the highway.

4. The permission hereby granted shall not be construed as authority to obstruct the public highway by the erection of scaffolding, hoarding or any other device or apparatus for which a licence must be sought from the Highway Authority Local Highway Service Group.

5. The permission hereby granted shall not be construed as authority to carry out works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a licence must be obtained from the Highway Authority Local Highway Service Group before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see:

<http://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice/ordinary-watercourse-consents>

6. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).

7. Pedestrian inter-visibility splays of 2m by 2m shall be provided on each side of the residential accesses and parking courts, the depth measured from the back of the footway and the widths outwards from the edges of the access. No fence, wall or other obstruction to visibility between 0.6m and 2m in height above ground level shall be erected within the area of such splays.

8. The Highway Authority advises that the proposed estate road(s) are of insufficient public utility to warrant adoption as highway maintainable at public expense.

9. When access is required to be 'completed' before any other operations, the Highway Authority will normally agree that wearing course material and in some cases edge restraint may be deferred until construction of the development is virtually complete, provided all reasonable care is taken to protect public safety.

10. H(Inf)17 - The applicant is advised that Public Footpath No. 161 crosses the application site and it is an offence to obstruct or divert the route of a right of way unless carried out in complete accordance with appropriate legislation.

11. H(Inf)23 - The applicant is advised that as part of the detailed design of the highway works required by the above condition(s), the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.

12. The applicant is advised that in providing each dwelling with integral cycle parking, the Highway Authority will expect dedicated integral facilities to be provided within each dwelling for easily accessible secure cycle storage/garaging.

Amended Scheme – Not yet received – to be reported orally.

<p>Busbridge Parish Council</p>	<p><u>Original Scheme:</u></p> <p>1. General</p> <p>Busbridge Parish Council has considered the application for the development of Tuesley hospital and our objections to the development going forward are focused on three main areas.</p> <p>In order these are:</p> <ul style="list-style-type: none"> • Traffic • Loss of parking • The draft Construction Environmental Plan (CEMP). <p>2. Traffic Concerns</p> <ul style="list-style-type: none"> • The biggest single issue for the Milford Hospital development, which has not been adequately addressed and which was the subject of much anxiety in the recent consultation, is traffic. • Of particular concern is the likely large percentage of cars that will leave the development and use Tuesley Lane north bound to access schools (Busbridge Infant and Junior), Godalming College and Godalming town centre shops and supermarkets (Waitrose and Sainsbury's are both in Godalming). This is a very restricted and narrow Lane which (particularly on the hill beside Ladywell Convent) where cars frequently are unable to pass. We have similar concerns regarding Hambledon Road which is an alternative route and is similarly narrow. • There are two assumptions in the submission which we believe are wholly wrong: • That either 100% or 80% of the traffic leaving the development will head south along Tuesley Lane. • That journey times are quicker going via Milford station than Tuesley Lane north heading towards Godalming. • Taking each of these in turn: • It does not seem reasonable or appropriate to assume that traffic patterns based on 2001 census data (when the hospital was a fully operational site) are either relevant or appropriate as a model for the new development. Indeed we believe it is highly likely that the majority of traffic will seek to use Tuesley Lane north heading for the facilities identified above. It is not a likely scenario we believe that the majority of traffic will head towards the much smaller
---------------------------------	--

	<p>facilities in Milford.</p> <ul style="list-style-type: none">• We do not believe that a judgement can be made or evidence submitted based on the journey time of a single trip on one day.• At the very least we would expect multiple journeys to have been made at different times of day and a mean journey time calculated.• In addition, this argument ignores the issue of miles travelled and the economics of shorter journey distances.• Many householders will be seeking to reduce the miles travelled due to the cost of petrol and therefore are most likely to use Tuesley Lane north bound to access the facilities in Godalming.• Apart from an inadequate evidence base and wrong assumptions, we believe that the solution put forward to address the issue, namely the erection of two “no left turn” signs from the development is almost laughable. The likelihood that this would either be observed or adequately policed is, we believe, highly unlikely.• The suggestion of incorporating 30mph signs on Tuesley Lane north is almost incidental as it is not possible for traffic to travel at speeds greater than this due to its narrowness of the road and blind bends.• This is very disappointing given that this issue has been flagged time and again in consultation.• We also believe that the issue of the junction at Station Lane and Church Lane will require addressing as part of the development and not at some point in the future.• It is also worth noting that Tuesley Lane will be heavily impacted by the proposed Godalming College development, which will come before Waverley Borough Council early in the New Year.• It is important that the combined effects of both developments are considered and not taken in isolation.• The HCA application has not considered the combined effects of another 40 to 50 properties using the same road.
--	--

	<ul style="list-style-type: none"> • The proposals are contrary to: <p>The WBC Supplementary Planning Document – Sustainable Transport Options. The minutes of the WBC Community Overview and Scrutiny Committee minutes of 12 Mar 12 (O34.1 and 34.4)</p> <p>3. Bus Access</p> <p>On the matter of pedestrian access to buses, the application suggests that a 10 minute walk across country to the A3100 is a realistic proposition for householders in the new development.</p> <p>This ignores the fact that for a very large proportion of the year the footpath is submerged in water (where the river Ock crosses) and cannot be used.</p> <p>This issue is not addressed nor is a solution proposed in the application.</p> <p>This is an omission which suggests not all the relevant facts are being presented.</p> <p>2. Parking</p> <ul style="list-style-type: none"> • The hospital has the capacity for 52 beds; and is used by outpatients Monday to Friday. • There are 25 parking spaces for hospital staff and provider organisations at the back of the hospital, on land that belongs to HCA that is due to be part of the development, which are not replaced as part of the proposals. • Provision to relocate these parking spaces should be made by HCA. • It is important that such spaces are not lost. • The developer should give due consideration to making available alternative parking specifically for hospital usage. Inside the hospital boundaries, there is already insufficient parking for all staff, visitors and day patients. <p>3. Construction Environmental Management Plan</p> <ul style="list-style-type: none"> • Whilst we accept this is a draft submission it appears to be an “off the shelf” version and is wholly inadequate for the circumstances at Milford Hospital.
--	--

	<ul style="list-style-type: none"> • The fact that the site will be surrounded on three sides by an operational, specialist rehabilitation hospital with many in-patients for whom a restful setting is an important part of recovery is completely ignored. • The first section only describes the site as a “former hospital”. The outline traffic plan makes no concession to the hospital’s existence except to mention the probable removal of the overflow parking on Tuesley Lane. • The air quality management plan only lists the hospital as being of high sensitivity less than 20 metres from the site. • The outline noise and vibration plan completely ignores the existence of the hospital. • We believe that the CEMP needs a complete re-write to fully take into account the needs of the hospital. <p>4. Conclusion</p> <p>Busbridge Parish Council has major concerns over the proposals for access and egress to the development which have been a key concern through the entire consultation process, and which the application itself fails to address.</p> <p><u>Amended Scheme</u> – not yet received – to be reported orally.</p>
<p>Hambledon Parish Council</p>	<p><u>Original Scheme:</u></p> <p>Hambledon Parish Council has reviewed the outline planning application and comments as follows.</p> <p>The provision of 120 new homes, of which 40 per cent would be affordable, is to be welcomed. This is an attractive scheme which would contribute to Waverley’s housing needs but as presently construed in not, in our view, sustainable development.</p> <p>There appear to be flaws in the transport assessment. It includes inaccurate information about bus services; predicates additional traffic on the basis of that currently generated by Milford Hospital; assumes that residents would make maximum use of enhanced footpaths and new cycle ways; and proposes that all traffic should exit the site via Station Lane and Milford. Are these assumptions realistic given that two cars per household is currently the norm and that people now expect to use their cars, as opposed to walking or cycling, for nearly all their essential journeys?</p>

The extra traffic that the site can realistically be expected to generate will put an enormous strain on all the surrounding lanes, including those in Hambledon (and particularly Station Lane/ Hydestile Crossroads/Hambledon Road/Malthouse Lane/Lane End) which would become a significant alternative route for those needing to avoid the congestion that will inevitable occur at Milford during peak hours. For Hambledon, therefore, the transport assessment is a recipe for blight rather than sustainability. A mitigating factor would be the introduction of bus services, carefully tailored to residents' time and destination requirements and to encourage maximum use; but this would be no more than a partial solution. Additional access roads should also be considered.

The outline planning application suggests a (non-site specific) contribution for mitigating the impact of the residential development that total just under £500k. We strongly recommend that the development should be on a "not for profit" basis and that the 72 houses (60 per cent of the total) that will be available for sale on the open market should be a mix of small to medium family – as opposed to executive homes. If this were the case, and assuming a value of c.£100,000 per unit, the residual value of the site would be approximately £7.2m. This could be used to provide essential infrastructure and amenities: without these the development will never achieve the sustainability credentials claimed for it in the outline planning application.

As an absolute minimum, appropriate transport and educational infrastructure needs to be put in place. The provision of a new road linking the site to the Milford/Godalming road appears so far to have been ruled out on cost grounds: if a proportion of the residual value were made available for transport infrastructure, this decision could be revisited. The possibility of finding a suitable and reasonably adjacent, off-site location for additional primary school facilities should also be investigated.

Hambledon Parish Council has now considered the additional transport information but the view is that this appears to do nothing to address either the Parish Council's previously expressed concerns or its suggestions for mitigating the strains that transport generated by the development would place on the existing infrastructure. Perhaps this could be duly noted. On the assumption that the Committee meeting on 20 March will be open to public speaking, Hambledon Parish Council would like to make representation.

Amended Scheme – not yet received – to be reported orally.

Godalming Town Council	Godalming Town Council has not commented on the application.
Natural England	<p><u>Original Scheme:</u></p> <p>European Protected Species (EPS)</p> <ul style="list-style-type: none"> • Dormice <p>The survey effort for this species is regarded as sufficient. We note that nests or partial nests were found in three of the dormice survey tubes indicating a small or low density population.</p> <p>Natural England does not object to the proposed development on the basis of the information available to use. Our advice is that the proposed development is likely to affect dormice through disturbance of the EPS or damage or destruction of a breeding site or resting place. We are satisfied, however, that the proposed mitigation would maintain the population identified in the survey report.</p> <p>We advise that the production of a Landscape and Ecological management Plan (LEMP) and the mitigation and enhancement measures (as listed in section 4.2 of the above Report) should be attached to the planning permission as conditions.</p> <ul style="list-style-type: none"> • Bats <p>The preliminary site assessment as presented in the Bat Survey Report concludes that the development site provides suitable foraging and roosting habitat for several species of bat. Roosting and likely breeding have been confirmed for common pipistrelle bats. Overall the site is considered to be of moderate conservation significance for the local bat population.</p> <p>Natural England considers that the survey effort, broad mitigation approach and further survey recommendations contained within the Report, at this preliminary stage appear sufficient. The recommended further surveys will inform a detailed bat mitigation strategy and any future European Protected Species Mitigation Licence Applications (please see below advice on licensing for more information on this aspect). Please re-consult Natural England when the further survey effort as detailed in the report has been completed.</p> <ul style="list-style-type: none"> • Badgers <p>Badgers and their setts are protected under the Protection of Badgers Act 1992. We note that an active sett has been</p>

recorded within the development site boundary. It is proposed, following further surveying, that this sett may need to be closed under this application. In this circumstance, plans for artificial sett creation are detailed within the ES. Please note that badgers must be found to be successfully utilising the artificial sett of their own 'free will' before any existing sett is closed. Any closure of badger setts will require a licence obtained from Natural England.

- **Designated Landscapes**

Natural England welcomes the Landscape and Visual Impact Assessment (LVIA) present within the ES for this proposal. We can confirm that the LVIA has been undertaken using the most recent and best practice guidelines available.

We welcome the division and separate assessment of 'landscape' and 'visual' impacts within the LVIA. We also welcome the consideration of the Local Character Area (LCA) of Wealden Greensand, and note that a number of elements in the proposed development are in line with characteristics that define this LCA, e.g. hedgerows and conservation of traditional orchards.

We note that, in total, eleven viewpoints have been considered, and that these were agreed with the Local Authority before the LVIA was undertaken (e.g. page 153). The viewpoints represent a range of sensitive areas and receptors, including public roads and public footpaths. We assume that the photographic Figures, presented with the LVIA, have been obtained using a 50.0 mm lens with an 8.0 mm aperture. However this is not stated on the Figures. We would also like to draw your attention to the results of the LVIA, as summarised in Table 11.2 of the ES. Viewpoint 2 (close distance view from Tuesley Lane adjacent to the listed buildings north-east of the site) is predicted to have an 'Adverse' effect through all stages of the development proposal, including post year 15 after completion, as is viewpoint 4 (public footpath 167), and viewpoint 7 (north corner of site adjacent to footpath 167). The Council should consider the impacts upon these viewpoints and the sensitivity of the receptors at these points, as there is a predicted residual adverse valency (cumulative impact) at these points, even with mitigation considered.

We note the Zone of Theoretical Visibility (ZVT) extends to 3km, and the 'worst case scenario' has been used for building height, i.e. eleven metres. However, we would expect to see a further map / Figure showing the 'visual envelope' which would depict, through colour coding, the extent of the land from which the development can be seen.

Natural England has concerns that the Surrey Hills Area of Outstanding Natural Beauty (AONB) has not been included in the LVIA. We note that there are a range of high topographical points (extending to 120-140m Above Ordnance Datum sloping upwards to the south-west of the site) located within 3km of the centre point of the site (see Figure 3). We note that these high points lie within the Surrey Hills AONB, which is located 1.5km away from the centre of the proposal. Natural England therefore has concerns over the visibility of the proposed development from high topographical areas within the AONB e.g. Hascombe Hill, Hydon Heath, Hydon Hill, The Hurtwood, Hambledon and so on. It is a possibility that these areas have been screened out in pre-application discussions with the Council, however, if they have not already been consulted, we recommend that the AONB Unit are consulted for any views that they may have on the proposed development. This is to ensure that the proposal is in line with the objectives within the AONB management plan. If appropriate, the LVIA could be extended to include these areas if there is found to be a degree of sensitivity. If residual significant adverse effects are predicated, mechanisms such as development re-design and screening could be employed as mitigation measures in the proposal for the designated landscape.

- **Other advice**

We would expect the Local Planning Authority (LPA) to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:

- **local sites (biodiversity and geodiversity)**

We note that the proposal lies close to a number of Local Wildlife Sites (LWS). We also note that a number of these may be hydrologically linked to the proposed development site. Natural England however does not hold locally specific information relating to the above. These remain material considerations in the determination of this planning application and we recommend that you seek further information from the appropriate bodies (which may include the local records centre, your local wildlife trust or other recording society and a local landscape characterisation document, in order to ensure the LPA has sufficient information to fully understand the impact of the proposal before it determines the application).

- **Licensing EPS – general**

Please note, a licence is required in order to carry out any works that involve certain activities such as capturing the animals, disturbance, or damaging or destroying their resting or breeding

	<p>places. Note that damage or destruction of a breeding site or resting place is an absolute offence and unless the offences can be avoided through avoidance (e.g. by timing the works appropriately), it should be licensed. In the first instance it is for the developer to decide whether a species licence will be needed. The developer may need to engage specialist advice in making this decision. A licence may be needed to carry out mitigation work as well as for impacts directly connected with a development.</p> <p>Natural England's view on this application relates to this application only and does not represent confirmation that a species licence/s (should one be sought) will be issued. It is for the developer to decide, in conjunction with their ecological consultant, whether a species licence/s is/are needed. It is for the local planning authority to consider whether the permission would offend against Article 12(1) of the Habitats Directive, and if so, whether the application would be likely to receive a licence. This should be based on the advice we have provided on likely impacts on favourable conservation status and Natural England's guidance on how we apply the 3 tests (i.e. no alternative solutions, imperative reasons of overriding public interest and maintenance of favourable conservation status) when considering licence applications.</p> <p><u>Amended Scheme</u> – not yet received to be reported orally</p>
<p>Surrey County Council Senior Countryside Access Officer</p>	<p><u>Original Scheme:</u></p> <p>The County Council must object to the application, as the plans indicate that a significant part of Public Footpath 161 Busbridge will be severely obstructed by the development footprint. In order for the county Council to withdraw its objection on these grounds, and for this development to proceed it will be necessary to process a legal order under s.257 of the Town and Country Planning Act 1990 to divert the legal route of the public footpath away from the proposed development. This order would need to be processed by your authority as the “competent authority” within the meaning of s.257(4) T&CPA 1990, and the resulting alternative route must be constructed to a standard acceptable to the satisfaction of the relevant area access Officer.</p> <p>However, the submission of the ‘LDA Design’ plan has provided a much clearer picture regarding exactly what the applicant’s intentions are in terms of the proposed diverted route and dedications. Turning firstly to the diversion under the TCPA 1990 and referring to plan 3227_070_A; the County Council would expect to see the proposed route run from E-C not D-C. It is imperative that point E terminates at the junction with Tuesley</p>

	<p>Lane (as footpath 161 does currently) and not truncate with Footpath 167 Busbridge, as the plan currently seems to indicate will be the case. The County Council would require the diverted route to be provided with a width of 3mts.</p> <p>The County Council would not be able to accept dedications of the routes marked F-G or the three further short spur routes to the south of this, which connect with what will remain of the operational side of Milford Hospital. The hospital grounds still in use would be considered private property and all Public Rights of Way should start/finish at an area of public domain i.e. public road, area of public open space etc</p> <p>The County Council would like to upgrade the status of public footpath 161 to a cycle track as highlighted in our previous response. The plan from LDA has allowed us to rethink this proposal slightly. It appears that the applicant is intending to dedicate A-B-F to the junction with C-E as a public footpath. This is the route that we would now like to see improved rather than A-C as originally proposed. It provides greater scope in terms of the openness of the route and the width that could be provided etc when compared to A-C. It is assumed that the applicant would be intending to improve the route A-B-F to junction with C-E as a matter of course, as it runs directly through the middle of the site and facilitates access for future residents towards Milford Station. In order to ensure a smooth and swift dedication process between the County Council and the applicant, they should ensure that the route is laid out with a width of 3mts to an approved specification much the same as will be required for C-E as part of any confirmed diversion order.</p> <p><u>Amended Scheme:</u></p> <p>- Not yet received – to be reported orally.</p>
English Heritage	No objection
Surrey Hills AONB Planning Adviser	<p><u>Original Scheme:</u></p> <p>The application site lies outside both the Surrey Hills AONB and the Area of Great Landscape Value but adjacent to the latter. Further, I do not consider the proposed redevelopment would harm views into or out of the AONB.</p> <p>The site is some distance from the nearest part of the AONB and the two do not read together from public viewpoints. The AGLV is on the other side of Tuesley Lane and although from some public viewpoints the site and AGLV are seen together, I</p>

	<p>do not consider that it could reasonably be argued that the proposed redevelopment would materially harm the character or setting of the AGLV. This is provided substantial tree and shrubbery cover is retained within the application site and the roofs and walls of the proposed buildings would be of mellow colours. New planting should be proposed that in time can take over from the existing tree and shrubbery cover.</p> <p>I note that the Waverley Local Plan designates the site as a Major Developed Site within the Green Belt (Policy RD6). Further that the supporting text to Local Plan Policy RD6 states that the site is suitable primarily for housing purposes. From an AONB aspect it is best that planned development sites such as this are developed as they have come forward through the development plan process and contribute to the Council's published identified housing supply. The main reason in this case is to substantiate the central thrust of the draft Core Strategy that the Council's housing requirements are to be met without having to resort to sites within the Green Belt (outside major developed sites), AONB and AGLV. The Surrey Hills Board very much supports the Council's draft Core Strategy.</p> <p><u>Amended Scheme</u> – not yet received – to be reported orally</p>
<p>County Archaeologist</p>	<p><u>Original Scheme:</u></p> <p>The application site is large – over the 0.4 hectares which is recommended for archaeological assessment and possible evaluation under Policy HE15 of the Waverley Borough Council Local Plan. The Environmental Statement that has been produced in support of the application has a chapter on the Historic Environment. This document, produced by Oxford Archaeology, draws together currently available information to assess the potential for the site to contain significant heritage assets. The document reveals that there are no designated heritage assets on the site, although there is evidence that remnants of the pre-hospital historic landscape are present in the form of historic hedgerows, which I am pleased to see are being retained within the new development.</p> <p>The document also assesses the potential for as yet unknown assets, in the form of buried archaeological remains, as moderate due to the presence of prehistoric and later remains discovered in the vicinity of the site.</p> <p>The document concludes that an archaeological field evaluation should be undertaken to provide further information regarding the nature and extent of any potential archaeological remains. I agree with this conclusion, and also advise that a photographic record equivalent to English Heritage level 2 should be carried</p>

	<p>out to make a record of the hospital buildings in advance of demolition.</p> <p>In order to secure the archaeological investigation and recording, as well as any additional mitigation that may be required once the nature of the archaeological resource has been clarified, the following condition should be attached to any planning consent that may be granted;</p> <p>“No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the Planning Authority”.</p> <p><u>Amended Scheme:</u></p> <p>Not yet received – to be reported orally.</p>
<p>Environment Agency</p>	<p><u>Original Scheme:</u></p> <p>We have no objection to the proposed development as submitted, but wish the following conditions and advice to be taken into consideration:</p> <p>Although we are satisfied at this stage that the proposed development could be allowed in principle, the applicant will need to provide further information relating to the management of surface water.</p> <p>The Shadwell Stream, which is an ordinary watercourse, flows to the south of the site through deciduous woodland. This area of woodland is to be retained, so there will not be any direct impacts on the stream through the development. There will be indirect impacts however, through increased public pressure, as the woodland will be part of a new SANG. Related to this, there will be a new footpath to facilitate access to the woodland. Therefore while we do not have any objections to the proposals on biodiversity grounds, we would ask that the footpath is constructed a minimum of 5m from the bank top of the stream.</p> <p>Condition 1</p> <p>The development hereby permitted shall not be commenced until such time as a scheme to Improve the existing surface water disposal system has been submitted to, and approved in writing by, the Local Planning Authority.</p> <p>The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing</p>

	<p>arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.</p> <p>Reason: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.</p> <p>Condition 2</p> <p>No development shall take place until a scheme for the provision and management of a 5 metre wide buffer zone alongside the Shadwell Stream shall be submitted to and agreed in writing by the Local Planning Authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the Local Planning Authority. The buffer zone scheme shall be free from built development including footpaths, lighting, and formal landscaping, and could form a vital part of green infrastructure provision. The schemes shall include:</p> <ul style="list-style-type: none"> • plans showing the extent and layout of the buffer zone. • details of any proposed footpaths, fencing, lighting etc. <p>Reason: Development that encroaches on watercourses has a potentially severe impact on their ecological value. In this development, we would want to see the proposed new footpath a minimum 5m from the bank top of the stream. This is to retain a wildlife corridor along the riparian zone and also to protect the banks of the stream from erosion.</p> <p>This condition is supported by the National Planning Policy Framework (NPPF), paragraph 109 which recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. The Natural Environment and Rural Communities Act which requires Local Authorities to have regard to nature conservation and article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.</p> <p>Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged.</p> <p>The agent for this application has been informed of our</p>
--	---

	<p>comments.</p> <p><u>Amended Scheme:</u></p> <p>Not yet received – to be reported orally.</p>
Thames Water	<p><u>Original Scheme:</u></p> <p>Waste Comments Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed. "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.</p> <p>Water Comments The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommends the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.</p> <p>Supplementary Comments Infrastructure capacity problems are known or suspected, the developer will be required to finance an impact study.</p> <p><u>Amended Scheme:</u></p>

	Not yet received – to be reported orally.
Network Rail	<p><u>Original Scheme:</u></p> <p>The increase in traffic over the crossing changes the risk profile. However, it is due to be renewed to a full barrier crossing in 2018, which will engineer against some of the larger risks.</p> <p>In the meantime Network Rail would be looking at some smaller scale engineering mitigations, which for the most part will involve us liaising with Surrey Highways to carry out the works.</p> <p>Network Rail have been through our level crossing toolkit program which suggests mitigation measures. Many Network Rail have discounted as they will be covered by the renewal, but the below are suitable interim measures:</p> <p>Unfortunately Network Rail have not had time to speak with Surrey Highways yet, who would be able to provide us with more details costs. Network Rail will get on and speak the them, but have used a rough figure of £25k to cover these measures, based on estimated costs we have used before.</p> <ul style="list-style-type: none"> • Alter the level crossing approach surface so that it provides a greater indication to the road user that a crossing is ahead. Alteration to the crossing approach surface can include: <ul style="list-style-type: none"> ○ Ripple bars ○ Rumble strips ○ Rumblewave surfacing ○ Coloured surfaces ○ Antiskid surfacing • Alterations to road approach speed profile. Amending (normally reducing) the road approach speed to a level crossing to reduce the risk of collision between vehicles and gates / trains • Provision of tactile edges (and stop lines) on the footway at public vehicular crossings would assist crossing users with visual impairments. It could prevent them from straying onto the roadway and increases awareness of where to stop on approach to a crossing should the crossing be closed to road users. • Red strip LEDs or Cat's Eyes on STOP lines. Install red strip LEDs or red cat's eyes along STOP lines to help to reduce a user's approach speed. This would provides highly visible red warning lights directly in the driver's line of sight. Ideally, lights would be interlocked with the level crossing warning lights. • Improve sighting distance: Remove foliage and other

	<p>obstructions. By cutting back vegetation and removing obstructions the sighting distances for users up and down the track and to signs / warning lights are lengthened. ORR emphasises the importance of optimum sighting distances, regardless of the protection provided at a crossing.</p> <ul style="list-style-type: none"> • Provide double yellow lines on the road approach to the crossing. Double yellow lines on the road approach to a crossing will deter users from parking in and around the crossing. This may provide a greater deterrent than double centre lines • Extended census. Conducting censuses longer than the standard 'quicktime' census (30 minutes) will provide a more accurate understanding of the crossing utilisation. For example, extended censuses can be conducted over a 24hr period providing utilisation information for day and night time or at different times in the week to demonstrate weekly variations. • Red light camera traffic enforcement (static). Provision of red light cameras at level crossings and prosecution of offenders will help reduce the potential for crossing violation, especially violations by users who: <ul style="list-style-type: none"> ○ Are unable to stop safely within time as the lights change (braking distance or tail-gated) ○ Fail to notice the lights ○ Refuse to stop because they believe they have sufficient time to cross before the train arrives <p><u>Amended Scheme:</u></p> <p>Not yet received – to be reported orally</p>
<p>Ramblers Society</p>	<p><u>Original Scheme:</u></p> <p>Assumption that 20% of the traffic will turn left is flawed. This is important because of the number of footpath that disgorge on to Tuesley Lane between the Development and the far end of Tuesley Manor, and the absence of any provision for pedestrians. The footpaths concerned are FP161 from Milford Station, FP167 from Portsmouth Road, FP27 from Ashstead Lane and FP162 which is their continuation across the Fruit Farm towards Hydestyle and Hydons Ball. Currently traffic is fairly light, but given the increase in traffic volumes then a pavement should be provided, which could be achieved by cutting into the field bank or a second best solution would be extensive traffic calming measures.</p> <p>Given their recreational pursuit then any re-routing of the footpath should preferably be in the Development's green area rather than along metalled surfaces.</p>

	<p><u>Amended Scheme:</u></p> <p>Not yet received – to be reported orally.</p>
Countryside Access Officer	<p><u>Original Scheme:</u></p> <p>Would like to upgrade the status of public footpath 161 to a cycle track. We would like to see the route A-B-F to the junction with C-E as a dedicated public footpath. This route is preferable to the A-C junction as originally proposed. It provides greater scope in terms of the openness of the route and the width that could be provided etc when compared to A-C.</p> <p>It is assumed that the applicant would be intending to improve the route A-B-F to junction with C-E as a matter of course, as it runs directly through the middle of the site and facilitates access for future residents towards Milford Station. In order to ensure a smooth and swift dedication process between the County Council and the applicant, they should ensure that the route is laid out with a width of 3mts to an approved specification much the same as will be required for C-E as part of any confirmed diversion order.</p> <p><u>Amended Scheme:</u></p> <p>Not yet received – to be reported orally</p>

Internal Consultations

<p>Council's Environmental Health</p> <p>(Contaminated Land)</p>	<p>Has reviewed the submitted report "Site Investigation of the central area of Milford Hospital, Home and Communities Agency, March 2012, Report reference 3511724, Parsons Brinckerhoff Ltd" and the earlier referenced report "Hospital site programme, Milford Hospital Godalming, Developers' information pack, Chapter 1 Geo-environmental, Scott Wilson Ltd August 2006".</p> <p>The reports identify several areas that will require more detailed assessment prior to commencement of construction at the site.</p> <p>The PB report references further works required to delineate made ground and elevated concentrations of lead in soils and testing around the former substation areas.</p> <p>The Scott Wilson report details an area of landfill in the south eastern section of the site and hydrocarbon impact from spillages / remediation activities associated with former above</p>
--	---

	<p>ground oils storage tanks. Further detail will be required regarding the identified areas of landfill in the south-eastern section of the site, specifically measures to delineate the landfilled area, a suitable ground gas assessment and measures to control the identified asbestos and hydrocarbons reportedly present in soil in the landfilled area. I note that the masterplan does not place any properties in this area but would expect a risk assessment and remediation plan regarding this area of presumed proposed open space / amenity.</p> <p>Full standard contaminated land conditions are recommended to be attached to the planning permission in order to clarify these identified issues.</p> <p>Model Planning conditions for development on land affected by contamination</p> <p>Unless otherwise required by the Local Planning Authority, development other than that required to be carried out as part of an approved scheme of remediation must not commence until conditions 1 to 4 have been complied with. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination to the extent specified by the Local Planning Authority in writing until Condition 4 has been complied with in relation to that contamination.</p> <p>1. <u>Site Characterisation</u></p> <p>An investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates in the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include:</p> <ul style="list-style-type: none"> • a survey of the extent, scale and nature of contamination; • an assessment of the potential risks to: <ul style="list-style-type: none"> • human health, • property (existing or proposed) including buildings, crops, livestock ,pets, woodland and service lines and pipes, • adjoining land, • ground waters and surface waters,
--	--

- ecological systems,
- archaeological sites and ancient monuments;
- an appraisal of remedial options, and proposal of the preferred option(s)

This must be conducted in accordance with DEFRA and the Environment Agency’s “Model Procedures for the Management of Land Contamination, CLR 11”

2. Submission of Remediation Scheme

A detailed remediation scheme to bring the site to a conditions suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

3 Implementation of Approved Remediation Scheme

The approved remediation scheme must be carried out in accordance with its terms prior to commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.

4 Reporting of Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 1, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of Condition 2, which is subject to the approval in writing of the

	<p>Local Planning Authority.</p> <p>Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with Condition 3.</p>
<p>Council's Environmental Health (Air Quality)</p>	<p>Having considered Section 8 of the Environmental Statement dated September 2012 by Parsons Brinckerhoff. The following comments and recommendations are made:</p> <ol style="list-style-type: none"> 1. Section 8.6 Mitigation and Enhancement Measures – <ul style="list-style-type: none"> • Recommends that a Condition requiring this section to be developed further to take account of the Mayor of London, London Councils' "The control of dust and emissions from construction and demolition" 2006. Specific regard should be made to Section 4.3 relating to a development of a Medium Risk Site (development of land between 1,000 and 15,000 square metres; developing between 10 – 150 properties; with the potential for emissions and dust to have an intermittent or likely impact on sensitive receptors) • The Condition should require that commencement of development shall not take place until a dust and emissions Method Statement (or an enhanced Dust Management Plan for the suppression of dust and control of emissions) during demolition of existing buildings and construction of the development has been submitted to and approved in writing by the Local Planning Authority. The measures as approved shall be employed throughout the period of development unless any variation has been approved by the Local Planning Authority. The mitigation measures shall cover Sections 6, 7 and 8 of the above mentioned guidance. • Reference to the use of vehicles and plant using ultra low sulphur diesel which meets the specification EN590:2004 and/or the after- fitting to vehicles/plant of devices that can reduce particulates should also be included. 2. Refers back to point 14 and 15 of the memo from the Councils' Air Quality Officer dated 03/05/2012 with reference to SO/2012/0003, and recommend that consideration should be given to the DEFRA good practice guidance "Low Emission Strategy: Using the Planning System to Reduce Transport Emissions" with a view to mitigating the impact of the development. <ul style="list-style-type: none"> • Recommends a Condition requiring an agreement with Planning regarding this mitigation so that prior to the

	commencement of development a scheme detailing the provision of Electric Vehicle Charging Points within the development shall be first submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in strict accordance with the scheme and maintained thereafter.
Council's Environmental Health (noise, drainage, light, waste and bonfires)	<p>The revised application appears satisfactory in that it sets out the proposed development and what issues will be addressed and how they will be managed. The comments made on the previous application about drainage have been addressed. They have advised that they will be following BS5228 regulations.</p> <p><u>Amended Scheme:</u></p> <p>Not yet received – to be reported orally.</p>

Representations

In accordance with the statutory requirements and the Reaching Out to the Community – Local Development Framework- Statement of Community Involvement – July 2006 the application was advertised in the newspaper on 26/10/2012, site notices were displayed around the site on 26/10/2012 and 2,550 neighbour notification letters were sent on 12/10/2012. Following a request for further information under Regulation 22 of the Town and Country Environmental Impact Assessment Regulations 2011 the application was re-advertised in the newspaper on 08/02/2013 by site notice on 08/02/2013 and further neighbour notification letters were sent out on 28/01/2013. Following the receipt of additional information received 21/05/2013 relating to transport mitigation further neighbour notification letters were sent out and new notices were posted in the vicinity of the application site.

Original Scheme:

The Council has received a total of 159 letters of representation including comments from various local groups objecting to the application. A petition signed by 175 people has been received objecting to the application. In addition 18 letters have been received making general observations on the proposal and 2 letters supporting the proposal have been received. Below is a summary of the representations received:

Rodborough School	<p>We have already raised a number of concerns about the Upper Tuesley development with relation to road safety along Station Road and Rake Lane. These are:</p> <ul style="list-style-type: none"> • As a school we have been very successful in
-------------------	--

promoting sustainable ways to get to school. Cycling and walking have been our two focus areas and in the summer months up to 1/5 of our school population of 700 (once Year 11 has left) cycle to school. We would be strongly encouraging students from any prospective upper Tuesley development to cycle or walk to school as well. This will increase significantly the number of students on Rake Lane each morning and evening. Currently we have between 30 and 45 students walking or cycling down the lane.

- Any students that do get driven to school from Upper Tuesley will add to the already fairly chaotic traffic situation along Rake Lane.
- Residents of Upper Tuesley who wish to access Petworth Road or Haslemere Road for other reasons are going to use Rake Lane as the preferred cut through once again increasing car numbers along the lane.
- We have a packed programme of extracurricular events which take place after school. These end usually at 4.30. More students using Rake Lane in the winter time whether they be on foot or in cars will increase danger and exposure along the more poorly lit sections of Rake lane. Despite lighting improvements some sections are still very dark, notably along the first straight leaving school and down the dip towards the small bridge.

There are some key danger areas on this route. One is the crossing of Station Lane. Cars come at this crossing fast and trying to get across the road can be difficult. Then there are two sharp fairly unsighted bends as you go along the lane. Cars are more prone than ever to speed up whenever they can along the lane to gain time on their journey. Only this Wednesday (19th Dec) a student was struck by a speeding car and sustained a fractured arm. As students walk along the straighter section of the lane after Rake Manor the vegetation is pushing out from the hedges forcing walkers into the middle of the road – again creating unexpected hazards for drivers as students are hit by branches and suddenly jump out. Finally, there are the lighting issues referred to above.

	<p>In short we are concerned that more students coming to our school from the Upper Tuesley proposed development will mean more students walking and cycling to school AND more vehicle traffic using the same route. We do not wish to see an increase in accidents like the incident yesterday and think that careful consideration of the impacts on increasing car and foot/cycle numbers on the route from Milford Station to Rodborough School need to be carefully considered and properly planned for in any proposal that get accepted.</p> <p>No comments.</p>
Virgin Care	<p>Virgin Care provides a wide range of health services from Milford Hospital on behalf of the NHS Virgin Care assumed responsibility for running health services from Milford Hospital from 1st April 2012. We lease the site from NHS Surrey, and from April 2013 ownership of the site will transfer to NHS Property Services.</p> <p>We welcome the redevelopment of the old hospital buildings surrounding the site as this provides an opportunity to improve the environment for patients staff and visitors to Milford Hospital.</p> <p>Our services support and treat older people often suffering form multiple medical problems. Our aim is that following a period of treatment and rehabilitation patients are able to either maintain or resume their lives in the community. Services are provided from the site.</p> <p>We have the following observations on the planning proposals;</p> <ul style="list-style-type: none"> • Transport • Virgin Care supports the development of alternative modes of transport to and from the site apart from the private car. We welcome and support the development of: <ul style="list-style-type: none"> • Improved public transport of the site • Car sharing schemes • Traffic calming to reduce traffic schemes • Cycle lanes • Improved pedestrian footpaths <p>We recognise, however, that the majority of patients and staff travel to the site by private motor car and the relative remoteness of the site means that this is likely</p>

to continue to be the main mode of transport.

- Parking for Patients and Staff visiting the Site
- The proposals will lead to significant loss of parking suitable for cars in the vicinity of the site. Our staff and patients currently use the parking facility at the rear of the site which is outside our demise, and also the parking places on the road at the front of the site.
- Parking within the site is inadequate because:
- There will be insufficient spaces following the removal of the rear car parking and the removal of the spaces at the front of the site.
- The internal road layout, surfaces and lighting are not sufficient to meet the needs of patients, carers and their families visiting the site
- We would like to discuss with both the planners and our landlords how accessibility to the site could be improved by:
- Providing a drop off/waiting bay for taxi cabs
- Providing covered cycle and motorbike, motor scooter parking space
- Improving pedestrian, cycle and motor vehicle access and egress to the site
- Increasing the number of car parking spaces within the site curtilage to compensate for the loss of on street parking and parking at the rear of the site
- Improving the quality of the existing environment through re surfacing, lighting and clear markings and sign posting
- Rear Access
- The rear access road into the site is currently used by
- Ambulances dropping off and collecting patients from the hospital wards

	<ul style="list-style-type: none"> • Deliveries to the hospital <p>It is important that this access road remains and is kept free from obstruction both during and following construction. We will also require some physical infrastructure to control access to the site at this point.</p> <ul style="list-style-type: none"> • Boundaries • The boundary line currently runs through a number of existing buildings. We are keen to understand what arrangements will be put in place to demolish buildings that are within our site and what remediation will take place following demolition. Boundary treatment – we wish to know what boundary treatment is proposed for buildings and landscape abutting our site-particularly height and type of boundary treatment. • Pedestrian Access • The planning application proposes the creation of pedestrian footpaths to the site. We are concerned that creating pedestrian access through the site would compromise the safety and security of both patients and our staff. For this reason we would resist the creation of pedestrian access. • Inconvenience and Disruption <p>Milford is a hospital site. Many of our patients are vulnerable and frail. It is most important that inconvenience and disruption to the provision of services from the site is kept to the absolute minimum. Where services to the site are to be disrupted as a result of changes to local infrastructure we expect to be consulted and to have an opportunity to develop appropriate contingency plans. We would appreciate it if construction planning could take this into account and particularly avoid noise and disruption late at night, early mornings and at weekends.</p>
NHS Surrey	Surrey PCT's concerns about the proposed Upper Tuesley development, specifically relating to its impact on Milford Hospital were set out in an email dated April 2012. It was noted with concern, that one of the opening statements in the Development Brief (subsequently endorsed and adopted by Waverley

Borough) was “Whilst the Brief addresses the setting and relationship of the redundant land and buildings with the operational hospital, the hospital land does not form part of this Brief”. There are issues relating to the protection and sustaining of Milford Hospital’s current ability to function effectively which should have been addressed at this stage, namely, essential services including the supply of electricity and effective drainage as well the significant impact on parking.

Comments about the hospital site were included within the Consultation Statement, including, to a degree, the comments contained within my previous email. Concerned that these comments/concerns have been dismissed for the most part, or at the least, not been given enough weight in the Council’s response.

The Council’s response to what they perceived as the “main issues” raised by the consultation, was quick to dismiss potential CIL contributions to the hospital on the basis that the PCT had disposed of its interest in the land and buildings on the development site. The Council must address the material point which is that although the PCT disposed of the development land, it has an ongoing duty and responsibility to ensure the ongoing functionality of an existing working hospital on its repainted land. As the hospital provides an important public service to Waverley residents, the Council should necessarily be interested in the protection of the efficient running of the hospital by using its powers at outline planning stage to limit the negative impact of any development on surrounding land, and ensure that where this is unavoidable that suitable steps are taken to adequately remedy this. In our last email we highlighted the areas where there was a realistic prospect of negative impact, which we would ask you to read in conjunction with the comments below:

Parking

There are three main issues here. The first stems from the potential withdrawal of the provision of overflow spaces on the development land (which the PCT currently licenses from HCA). I note that in the full summary of consultation responses which annexed to the consultation statement there was a reference to concern over the lack of provision to relocate these spaces. This was dismissed by the Council as a

landowner matter. However, we would argue that it is an important planning consideration for the reasons stated above and that pressure should be applied to the developer by the Council to maintain the provision at its current level on the development (or alternatively fund and build new provision on the hospital site). We would urge the Council to amend the HOT accordingly and apply a condition to any consents relating to the provision of parking.

The position relating to parking is exacerbated when considering the proposed loss of existing roadside parking in favour of traffic calming. Cars and lorries routinely use this wide area to park. The traffic calming in this respect may create a new problem.

The second issue relates to the realistic predication that the provision of residential parking within the development proposals will not satisfy resident (and visitor) demand., resulting in the unauthorised use of hospital parking spaces on the hospital site by residents of the development and their visitors. I note that this concern was also included within the full summary of consultation responses in which it was stressed that NHS parking should not be compromised. The Council noted the point. The PCT would be interested to know how the Council intends to deal with this issue at outline planning stage. You can appreciate from the hospital's point of view that preventing overflow parking from the development in hospital spaces would be incredibly difficult and costly to police. Clause 12.76 of the Council's Local Plan provides for a higher car parking provision than the 1.5 average per dwelling in exceptional circumstances, given the largely rural character of the area. We believe this situation would comprise an exceptional circumstance, especially where disruption to a working hospital is at stake and we would therefore urge the Council to give consideration to this in the light of the above. The Council should also revisit the potential for CIL funding in this regard.

The third issue relates to the part of Tuesley Lane which fronts the hospital, and which also currently provides essential overflow parking for the hospital. This area would inevitably be subject to additional pressure from the development and result in even less scope for hospital users.

These three potential sources of significant pressure

highlight a fundamental need for the issue of parking for Milford Hospital staff, users and visitors to be dealt with by the Council at outline planning stage.

Drainage

Refer to the comments in email of April 2012 relating to electricity and drainage serving both sites. Again, these points were acknowledged by the Council in the Annexe to the consultation statement and were dismissed as “landowner matters”. Again we are concerned that a failure to address these fundamental areas at this stage, could result, in a dangerous impact on patient services, should power be lost, and at the least a serious disruption to services, should drainage be affected. In relation to the latter, we would also draw your attention to the comments made in an email from Thames Water, highlighting an “inability of the existing waste water infrastructure to accommodate the needs of this application”.

Access to Hospital

Ambulances and emergency vehicles access the rear of the hospital via existing access across the development site. Would stress the importance of retaining and upgrading this. Previously this was stated to be a landowner issue. We appreciate this but would expect that the Council would have an interest in ensuring the ease of access to and egress from the hospital for Waverley patients.

Design issues

Reiterate comments from the Brief consultation. The point made previously was misunderstood the design should embrace the existing hospital (particularly as the boundary line was incredibly close to some areas), and that the design of the development should therefore be sympathetic to it because of the presence and proximity. The comment previously made was interpreted that the hospital would be seen as unsightly from the development’s aspect, and the response stated steps that would potentially be taken to remedy this for the benefit of the residents.

Development contribution to improvements at the hospital

This issue was deemed, at Brief consultation stage, by

	<p>the Council, to be a matter for the PCT. We fail to understand how the PCT would be able to have any influence over such contributions, and against would expect it to be dealt with by the Council as part of the outline planning application and instead by way of its powers apply the necessary conditions at this stage to secure the necessary provision of health services without encumbrances by the proposed development.</p> <p>Whilst NHS Surrey does not have an objection to the proposal in principle, we do believe that consent be withheld until these issues are resolved.</p>
Surrey Link	<p>The outline noise and vibration plan makes no mention of the hospital, its patients or its staff. The land around the hospital requires development but this must be done with sensitivity and with regard to the needs of the hospital.</p> <p>The hospital should be financially compensated because of the disruption that will arise from the HCA development.</p> <p>Both entrances to the hospital site need to be continuously available.</p> <p>The hospital has the capacity for 52 beds; and has a day hospital which sees out patients daily, Monday to Friday. There are 25 parking spaces for hospital staff and provider organisations at the back of the hospital, on land that belongs to the HCA that is due to be part of the development. Provision to relocate these parking spaces should be made by the HCA.</p> <p>The developer should give due consideration to making available alternative parking specifically for hospital usage. Inside the hospital boundaries, there is already insufficient parking for all staff, visitors and day patients.</p> <p>The Traffic and Transport Plan makes no mention of the hospital. Clearly any development of the site will generate an increase in traffic using Tuesley Lane. This almost certainly will require some form of traffic regulation at the steep north, Godalming end of the land. An improved bus service to the site would assist in reducing some traffic, and would be welcomed by the hospital.</p> <p>The environment surrounding the hospital desperately</p>

	<p>needs improvement, and we are pleased that a development is proposed. It is hoped that the HCA will note any individual mature trees and plan sensitively with regard to preserving these. Sensitivity is also required to preserve the tranquillity of the site as a rehabilitation centre.</p> <p>We understand that Waverley's preferred use of the site is residential. While this is understandable, the development is a large one, and attention could be given to some form of infrastructure, to keep residents from needing to move off site and use local roads. This might comprise a local shop, post office, purpose built nursery, day centre, club house etc.</p> <p>Affordable housing will be welcomed as it could provide accommodation for staff working at the hospital.</p>
<p>League of Friends of Milford Hospital</p>	<p>Although the redevelopment of the site is welcomed, there are concerns that the interests of patients, their visitors and staff are not fully considered in the application. Milford Hospital is a busy specialist rehabilitation hospital with an associated Day Centre. As the development would surround the hospital, its impact on the hospital such as landscaping and noise, should be at the forefront of considerations by Waverley Borough Council.</p> <p>Additionally there are concerns about:</p> <ul style="list-style-type: none"> • Pollution control, • access (the lower road to the hospital is the Ambulance access and should never be compromised), • roads and traffic, parking (25 parking spaces for hospital staff and provider organisations to be lost to the development), • environment (pleased that the development will improve the land surrounding the hospital, however it is hoped that the HCA will note any individual mature trees and plan sensitively with regard to their preservation). • Housing (affordable housing is welcomed as it could provide accommodation for staff working at the hospital). • Amenity Infrastructure (as the development is large, attention should be given to some form of amenity infrastructure for future residents). <p>The land around the hospital requires development,</p>

	<p>but this must be done with sensitivity, and with regard to the needs of the hospital. I would suggest the hospital might be financially compensated because of the disruption that will arise from HCA's development.</p>
<p>Godalming Angling Society</p>	<p>Has previously written to Waverley Borough Council in relation to the proposals on 6 occasions during the Development Brief stage.</p> <p>Whilst the comments in relation to planning policies were addressed in respect of the former statutory policies, the same principles apply.</p> <p>In particular, comments in respect of the proposed use of Tuesley Lane and any restrictions are extremely important and the Godalming Angling Society are particularly concerned that these issues are closely addressed.</p> <p>Busbridge Lower Lake is by definition a Large Raised Reservoir controlled by statutory obligations and Waverley Borough Council has a duty to ensure that the statutory obligations are followed and must be taken into account.</p>

The other letters of objection have raised the following comments::

<p>Traffic Assumptions in Traffic Assessment</p>	<ul style="list-style-type: none"> • Wrong to compare traffic data to previous use as hospital; consideration needs to be given to the existing changes which have occurred since Milford Hospital was a working hospital (size of vehicles, expansion of Godalming College to 2,000 pupils , expansion of St Hilary's) – base traffic levels would therefore be higher. • Traffic generation and distribution not in line with industry best practice and guidance. • Wrong to use 2001 census and 2001 journey to work data for Milford Ward as a model • Unrealistic to state 20% of vehicular movements will be northwards along Tuesley Lane when Godalming is nearest centre for retail, employment and education • Traffic survey undertaken in January and May unrepresentative and the 17th July survey carried out on a day when St Hilary's School closed and Godalming College barely functioning post public exams. • No assessment made of other developments for
--	---

	<p>the area.</p> <ul style="list-style-type: none"> • Refers to development on edge of town/suburbia but in reality no local services. • Relies on outdated accident data - Recently a pupil from Rodborough knocked down in Rake Lane. • Trip frequency assumptions are low • Insufficient consideration of accident data • Revised Traffic Assessment fails to address concern regarding traffic along Tuesley Lane • Too little information to make an informed decision
Other traffic concerns	<ul style="list-style-type: none"> • Lack of sufficient road infrastructure • Traffic calming is just gestures – ignores that lane unsuitable for volumes of traffic • Tuesley Lane steep, no sight lines and narrow with no passing places in middle section. • Need traffic calming, restriction to 15 mph with traffic lights or one way between Ladywell Hill (Tuesley Lane) and Holloway Hill. Tuesley Lane/Holloway Hill/Shackstead Lane narrow and hazardous and without a traffic solution of Tuesley Lane plans remain unsustainable. • Vehicles over 7 tonnes should be barred from using Ladywell Hill • Additional traffic on local roads will cause more congestion, noise and danger, in particular reference is made to Station Lane, Tuesley Lane, Water Lane (through Enton), Junction of Church Lane and Station Road, Brighton Road, Brighton Road, Holloway Hill, Shackstead Lane, Quatermile Road. There are already traffic jams • Additional traffic in Busbridge where there are three schools and a very busy college • Need to improve junctions of Ashstead Lane, Minster Road, Quatermile Road, Shackstead Lane/Entrance to Godalming College, Busbridge Lane and Tuesley Lane • Concern over cumulative traffic impacts with other nearby developments. • No footpath on minster Road is potentially dangerous. • Not environmentally sound – does not allow safe pedestrian access and walking will be affected- Important for walkers to walk along Tuesley Lane • Policies M2 and M7 not enough funds to comply with CS4 • No direct provision for cyclists • Continuous footways required on both sides of

	<p>Tuesley Lane in Busbridge and need to improve pinch points on Holloway Hill and roadway between Croft Road and Flambard Way.</p> <ul style="list-style-type: none"> • Pressure on parking in Godalming • Concerns about increase in motorbikes using footpaths • Concern about all-weather suitability of footpaths. • Concerns about construction traffic • Busbridge will become grid locked twice a day and will be used for car parking • Access north from site should be prohibited • Should be a new road from site to Milford Crossroads/Portsmouth Road • Enforceability of quiet land • Increase in accidents and road rage • Tuesley Lane has become unsuitable for pedestrians • Tuesley Lane one of worst affected roads in bad weather • Mitigation measures nowhere near alleviate problems
Public Transport	<ul style="list-style-type: none"> • Remote location; residents likely to be reliant on the private car. • Lack of public transport, trains don't stop regularly at Milford Station and although Traffic Assessment refers to buses there is in fact only one a day. • Not realistic to use bus on Portsmouth Road • Parking at Milford Station not resolved • Lit and surfaced footpath needed to Milford Station • Not clear about provision for cycles at Milford Station. • Not conducive to non car transport
Environmental issues	<ul style="list-style-type: none"> • Impact on AGLV • Demolition of Water Tower – could be converted • Loss of green space, open countryside, woodland, playing fields and wildlife habitat • Green Belt should be protected • Impact on openness of the Green Belt – present buildings on site are closely grouped, the proposed development would result in buildings spread out over the whole site, enclosing it for ever. • Overdevelopment • Godalming losing its identity • Risk of more development on green fields • The site adjacent to Ladywell Hill forms the most

	<p>critical part of Tuesley Lane North which is a site of high archaeological potential.</p> <ul style="list-style-type: none"> • • Tuesley Lane may have Saxon or earlier origins close to site of earliest church in Godalming (7th century Minster Church) and Ladywell. No regard to historic nature and inevitability of destruction of unique land and habitat. • Tuesley Lane is bounded on one side by a Historic Park • Tuesley Lane is bounded on one side by a site of nature conservation importance. • Significant development without services • Three storey buildings out of keeping • Hard landscaping would increase excess water • Loss of countryside • Loss of green space • Prejudice access to neighbouring property, "Crowts" • The provision of only 10% renewable is un-ambitious. • Lack of recreational facilities for older children. • Concern over increase in light pollution • Further erosion of Tuesley Lane • The development would have an adverse affect on the town's identity
Impact on Hospital	<ul style="list-style-type: none"> • Hospital parking needs to be addressed • Noise and disruption to hospital patients and visitors
Wildlife	<ul style="list-style-type: none"> • Significant effects on habitats, flora, fauna, downgrading of local environment and prejudice to local wildlife including unusual birds, insects, deer, bats, and badgers. • Effect on SSSI
Services	<ul style="list-style-type: none"> • Pressure on local services – schools, doctors - Investment needed in schools, local schools oversubscribed • Lack of infrastructure and services • Insufficient community gain • Sports facilities should be provided as part of the redevelopment
Affordable	<ul style="list-style-type: none"> • Too many 4/5 bed homes

houses/mix	<ul style="list-style-type: none"> • Potential to catch up on lack of affordable housing • 40% of affordable housing should be a maximum not a minimum – need shared ownership • Fails to address lack of affordable housing in Surrey • Milford Hospital built as a sanatorium and was suitable for this use. • Should provide higher proportion of affordable housing • Construct fewer higher value houses and provide affordable housing in more appropriate location • The isolated location and lack of community facilities will fail to create a sense of community spirit or identity.
------------	--

The received representations include a Transport Assessment Appraisal from WSP dated 11/12/2012. The additional Transport Assessment has been commissioned on behalf of the Hall Hunter Partnership which owns the nearby Tuesley Farm. The WSP Assessment raises the following concerns about the Transport Assessment submitted with the application:

- The traffic generation and distribution are not in line with the industry best practice and guidance and WSP's estimate of traffic which might be expected to be generated by the site is some 15% higher;
- Further traffic comparison between the existing hospital land use and the proposed residential land use should be provided during AS and PM peak time periods to provide a more accurate estimate of the residential units conversion ratio;
- Issues on the junction capacity assessments have also been identified and should be addressed. Further junctions and links should also be assessed;
- The proposed development is located in a rural area, and although it is identified in the Upper Tuesley SPG it does not appear to fully comply with national and local policies;
- The development is located at a remote location with difficult cycle and pedestrian access to schools, facilities and public transport;
- Footpaths through fields do not provide all weather access for regular commuting to work or to reach schools and other facilities required on a daily basis;
- The development is not well served by adequate public transport services;
- Vehicles parked to the south of Milford Railway Station block the footway and will be an issue for pedestrian and cyclist movements;
- Station Lane, north of Milford Railway Station, does not provide adequate cycling and walking conditions to encourage the future residents to walk or cycle to the facilities within Milford;

- A further in depth review of the accident data should be undertaken to identify any physical limitations in the local highway network which could be mitigated as part of the proposed development;
- Further information on car and cycle parking capacity at Milford Railway Station should be provided;
- The proposed ban of left turn out movements from the development accesses cannot realistically be enforced;
- No assessment has been made of the impact of demolition and construction traffic.

2 letter has been received expressing support on the following grounds:

- Support new housing but the traffic implications need to be considered.
- The majority of people objecting live close to the site and do not represent the majority.

Amended Scheme:

At the time of preparation of the report, no letters had been received. Any comments received will be reported orally.

Submissions in support

In support of the application, the applicant has made the following points:-

- The application proposal has emerged following extensive engagement with the Local Planning Authority and public consultation which has led to the recent adoption of a Supplementary Planning Document for the site.
- The proposal represents an opportunity to utilise the previously used land and redundant space within the non-operational campus to provide much needed private and affordable homes.
- The scheme proposes the partial redevelopment of a previously developed site and is therefore not inappropriate development
- The scheme would make a significant contribution to Waverley's required housing figures.
- The proposed development would achieve a level of 40% affordable housing.
- The master plan proposes an integrated network of high quality public open spaces within the site, most of which form part of the pedestrian links through the scheme.
- The development would open up recreation and accessibility to open spaces.
- The scheme would include the regeneration of existing orchard to the south-west corner of the site.
- A green spine runs through the centre of the site connected the SNCI to the north to the area of ancient woodland to the south.

- Housing clusters would be centred on small shared courtyard spaces with an informal layout, and will be designed in the character of a 'HomeZone'.
- Suitable Alternative Natural Green Space (SANGS) is to be provided in a single block to the south of the site.
- The proposal would meet Level 4 of the Code for Sustainable Homes, use a high Fabric Energy Efficiency Standard (FEES); would use solar photovoltaic technology; minimise the use of natural resources during construction; and encourage sustainable modes of transport.
- The form of housing across the site will vary. Whilst design is a reserved matter, the Design and Access Statement (DAS) confirms that high quality architecture will be encouraged to help create a distinctive neighbourhood.
- The removal of derelict buildings on the site would benefit the wider area.
- The DAS sets out that, as a key design principle, the site should foster a unique identity for Upper Tuesley based on its heritage, through the careful restoration of buildings such as Allison House and the staff cottages coupled with the creation of high quality new buildings.
- Visual buffers shall be used to ensure the development is set within an enclosed natural landscape.
- The Transport Assessment has considered the impact of 120 dwellings at the Upper Tuesley development for a design year of 2017. Modelling indicates that some physical mitigation measures would be required as a result of the development.
- A Framework Travel Plan shall be produced to reduce reliance on single occupancy car travel and encourage sustainable modes of transport.
- A Phase 1 Habitat Survey has been undertaken although the site is bordered by a SNCI and ancient woodland, it is unlikely to have any adverse impact on biodiversity.

Principle of development

The planning system is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

The planning application seeks outline permission for the development proposal with all matters reserved for future consideration except for access. As such, the applicant is seeking a determination from the Council on the principle of the residential development and associated access.

As discussed earlier in the report, in accordance with statutory requirements the applicant has submitted an indicative layout showing the approximate location of buildings, routes and accesses included in the proposal; in addition the applicant has submitted the upper and lower limit for the height, width and length of each building (the parameters of scale).

The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development (paragraph 197).

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

The site is located within the Green Belt outside any defined settlement area. Within the Green Belt there is a general presumption against inappropriate development which is, by definition, harmful and should not be approved except in very special circumstances.

The application site is allocated under Policy RD6 of the Waverley Borough Local Plan 2002 as a Major Developed Site in the Green Belt. Annex C of the now defunct Planning Policy Guidance 2 Green Belts, sets out the policy guidance relating to infilling within and redevelopment of major sites in the Green Belt, including redundant hospital sites.

With the adoption of the NPPF, PPG2 and the advice contained in Annex C thereof were cancelled. Advice contained within the NPPF now states that a local planning authority should regard the construction of new buildings within the Green Belt as inappropriate. Exceptions to this are *inter alia* limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which 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. Officers consider that the Milford Hospital site constitutes previously developed land, and subject to the detailed consideration of the proposal in light of the criteria contained in Policy RD6, which is consistent

with the guidance in the NPPF, the redevelopment of the site is, in principle, acceptable.

The commentary text to Policy RD6 states that the Council considers that the site is suitable primarily for housing purposes, with an objective of securing an element of subsidised affordable housing,

On 19th July 2012 The Council, following a robust consultation, adopted “Upper Tuesley (Land Adjacent to Milford Hospital) Development Brief” as a Supplementary Planning Document (SPD). Milford Hospital is allocated in the adopted Local Plan (2002), at saved Policy RD6, as a Major Developed Site in the Green Belt. Waverley Borough Council approved its Core Strategy on 22nd January 2013 and it was formally submitted for Examination on 31st January 2013. The Draft Core Strategy maintains the Major Developed Site designation for Milford Hospital. In this context, the Development Brief provides supplementary guidance to existing Development Plan policy, and is an important material consideration in the determination of any planning application. In that context, the aims of this Development Brief are to:

- Amplify the guidance in Local Plan Policy RD6
- Identify the key environmental, traffic and utility constraints, taking into account the existing lawful use of the site as a possible fallback position.
- Respect the rural character and amenity of the area
- Ensure that a balanced community is created, incorporating an appropriate mix of dwelling form, size and tenure
- Secure appropriate community benefits including a minimum of 40% affordable housing
- Promote sustainable development and sustainable construction technologies.

The site is within the Wealden Heaths Special Protection Area Buffer Zone. Development should not result in a significant effect upon the integrity of the SPA.

The site is located adjacent to a Site of Nature Conservation Importance. The NPPF states that the Planning System should contribute to and enhance the natural and local environment by minimising impacts upon biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity.

The proposal involves a substantial redevelopment of the site, and as such, the impact of the envisaged traffic movements on highway safety and capacity have been considered by the County Highway Authority.

The proposal is for a substantial residential development and accordingly the Council's policies on housing density, size of dwellings and affordable housing are relevant.