

ANNEXE 4

Overview of Consultees' Response to LPP2 Regulation 19 Addendum Consultation

From the 1 October to 12 November 2021

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This document contains a summary of representations received from key groups of consultees during the Local Plan Part 2 Regulation 19 Addendum consultation, which took place from 1 October 2021 until the 12 November 2021.

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SPECIFIC CONSULTATION BODIES

1.1 Environment Agency

General Support

- General support and no soundness issues on the addendum.
- As per their previous response, they highlighted that Haslemere sites were located within groundwater Source Protection Zones (SPZs) and principal aquifer.

Recommend

- Connecting sites DS02, DS03, DS04, DS05, DS9 and DS10 to the mains foul drainage and that any surface water drainage to ground will need to be carefully considered. This prevents contamination of the groundwater aquifer which is used for drinking water supply.

1.2 National Highways (formerly Highways England)

General Support

- Acknowledged the changes to the site allocations at Haslemere.
- Reviewed draft plan and supporting consultation documents and had no detailed comments.
- As per their previous response, the sites due to their size and/or location would unlikely materially impact the operation of the Strategic Road Network.

Recommend

- Consideration should be given to assessing the cumulative impact of new proposals together with already planned growth in Waverley on the Strategic Road Network.

1.3 Historic England

Red Court, Haslemere

- Notes the removal of this site and therefore their previous objection has also been removed.

Support

- Support sites DS01, DS07, DS08 and DS09 and notes the additional heritage references in the policy as per their previous response.

Concern/Objection

- DS06 the Royal Junior School is adjacent Grade II Amesbury School and development may affect its setting¹.
- Suggest this should be reflected in the wording of the policy by including a requirement for development to respect the setting of a heritage asset.

1.4 Natural England

DS06 Royal Junior School

- Notes that there is scope for some low-density development but have not yet seen evidence that it could support 90 dwellings without an unacceptable negative impact upon the AONB.
- Note that design and layout considerations are very important and should refer to the Surrey Hills Design Guide and Surrey Hills AONB Management Plan.
- Emphasise the need to demonstrate the exceptional circumstances that may make major development on this site acceptable (paragraph 176 - 177 of the National Planning Policy Framework (NPPF)).
- There is currently no acceptable mitigation proposal to avoid impacts on the integrity of the Wealden Heaths Phase II SPA, by way of Suitable Alternative Natural Greenspace (SANG).
 - Recommend
 - Suitable mitigation requirements are secured through the Local Plan.
 - Look forward to further work with the Council and/or developer to advise on a suitable scheme for this site, which would be likely to involve reducing the housing numbers.

DS07 Fairground Car Park

- Notes a lower yield of now 20 dwellings.
 - DS07 will still require some form of mitigation for impacts upon the Wealden Heaths SPA although this does not necessarily need to be full SANG.

DS08 The Old Grove

- Notes a higher yield of now 40 dwellings
 - DS08 will now require mitigation for potential impacts upon the Wealden Heaths Phase II SPA.
- This site is also adjacent to the DS06 Royal Junior School site so in-combination effects will require consideration for the potential 130 dwellings in this area.

¹ Minor modification required – See MOD52

- Mitigation measures outlined within the Landscape and Visual High-Level Review Addendum must be fully secured and the specific design and layout of the development will be important in moderating any effects.
- Development of the site should seek to protect and enhance the AONB which may include retaining suitable buildings and replacing those which are not in-keeping with the AONB.
- This allocation will now also require demonstration of meeting the exceptional circumstances that may make major development on this site acceptable (paragraph 176 - 177 of the NPPF).

Habitats Regulation Assessment (HRA) Addendum

- 400m zone
 - Acknowledges that there may be exceptional circumstances where an individual HRA can conclude no adverse effects on the integrity of the SPA from a unique application within 400m but this would require evidence of the particular exceptional circumstances and agreement with Natural England and the Local Planning Authority.
- Suitable Alternative Natural Greenspace (SANG)
 - Strongly advise the removal of the wording 'although any SANG that was deemed necessary would not necessarily need to rigidly comply with the Thames Basin Heaths provision standards'.
 - NE advise that the starting point for creating an acceptable SANG should be to refer to the Thames Basin Heaths guideline criteria. In certain unique cases there may be justification for deviation from the guidelines, but this would be dependent upon the scale and location of the site and allocated dwellings, as well as the quality and connectivity of the SANG among many other factors. This would need to be agreed on an individual basis with Natural England, rather than being standard practice.
- Heathland Infrastructure Projects (HIPS)
 - Further work is needed to evidence the type of mitigation that could be effective in Waverley for the Wealden Heaths SPA for 20-49 dwellings apart from SANG. Alternatives to SANG should be investigated specifically for the Wealden Heaths area. NE note that East Hampshire District Council have been exploring the possible use of what they have termed Wealden Heaths Infrastructure Projects (WHIPs) and advise that a collaborative approach, also including the South Downs National Park Authority, could be advantageous to addressing the similar local issues across Planning Authority boundaries.

1.5 Surrey County Council

DS06 Royal Junior School

- Highways
 - No immediate highway related concerns, however, like all sites, DS06 should be accompanied by a Transport Statement, and high-quality pedestrian and cycle links should be promoted connecting each site to the surrounding built environment and key routes.
 - Notes that LPP2 'Policy DM6: Public Realm' in the Regulation 19 draft local plan does state that new development should provide safe and direct pedestrian and cycle movement where changes to the public realm are made.
- Heritage
 - Although the DS06 Royal Junior School site is not within an archaeological constraint area, the site is 9.6ha in size. According to the Waverley Borough Council regulation 19 draft submission local plan and 'Policy DM25: Archaeology', sites over 0.4ha in size should be subject to archaeological assessment and possibly evaluation prior to development. SCC suggest that this requirement should be reflected in Policy DS06.

1.6 Thames Water

Desktop assessments for development sites

- Provided site specific comments from desktop assessments on water, sewerage/waste water network and waste water treatment infrastructure in relation to the changes to the proposed development sites.
- Highlighted the cumulative impact of DS08 and DS06 raises some possible waste water capacity concerns that may require more detailed modelling to assess/ refine infrastructure requirements.
 - Notes that the nearest public sewer both sites DS06 and DS08 are located on Crossways and Kingswood Firs.

1.7 Sport England

Concern/Objection to DS06 Royal Junior School

- Loss of sports facilities
 - Objects to the site allocation as proposed without any requirement to replace the playing field/ sports facilities.
 - Considers the approach inconsistent with para 99 of the NPPF and Sport England's own playing fields policy.

Suggest

- DS06 development provides replacement facilities
 - Considers the allocation should be modified to ensure that the site is allocated for housing subject to providing replacement playing field/pitches and sports facilities in compliance policy.

1.8 Adjoining Local Authorities

1.8.1 South Downs National Park Authority (SDNPA)

General Support

- General support for the plan in general.
- Acknowledged that the Red Court allocation has been removed.
- Highlighted the SDNPA's six strategic cross-boundary priorities and stated their particular support on joint work on the Wealden Heaths Phase II SPA through the officer working group, highlighting the importance of continuing this work on an ongoing basis.

TOWN AND PARISH COUNCILS

2.1 Haslemere Town Council

Support

- Removal of Red Court site
- Inclusion of DS06 Royal Junior School site
 - Subject to a development cap of 90 units and built on land on which there were previously constructed buildings or hardstanding.
- DS04 Land at Wey Hill Youth Campus site's lower dwelling yield change.
- DS05 Haslemere Prep School site's higher dwelling yield change.
- DS08 The Old Grove site's higher dwelling yield change.

Concern/Objection

- DS01 Haslemere Key Site
 - Question the site's deliverability and seek evidence to justify its inclusion as a site allocation in the plan.
- DS07 Fairground Car Park allocation should yield more dwellings
 - Policy H2 of the Haslemere Neighbourhood Plan states an aim of building as many houses as possible within settlements rather than on greenfield land, and it is necessary to prioritise brownfield sites and to build at densities which maximise the contribution the sites make to the housing target. This is generally expected to be 45 dwellings per hectare and within 1,000m of the railway station it is anticipated to be 75 dwellings per hectare.
 - DS07 is a prime site within 1,000m of the station and the proposed addendum reduces the density from approximately 90 to 30 dwellings per hectare, which the HTC suggests is too low.

COMMUNITY INTERESTS

3.1 Residents Associations

3.1.1 Haslemere South Residents Association

Support

- Haslemere settlement boundary changes.
 - As it now complies with the adopted Haslemere Neighbourhood Plan, as well as protecting our important greenfield on the edge of the settlement.
- Removal of the Red Court site.
 - Any development of this site will have a tremendous adverse impact on the landscape, the setting of the AONB and the South Downs National Park, as well as the Grade II listed Red Court house and lodge. The local infrastructure cannot absorb the additional number of people and cars that will be using this site, and the proposed highway changes to the surrounding area will have a severe adverse impact on the character of the area. The deletion of this site is therefore strongly supported.
- Inclusion of DS06 Royal Junior School site.
 - The site is to become vacant when the school relocated its pupils to the original and main school site on Farnham Lane. The Royal School Hindhead site is a brownfield site with well-established good access links into and out of the site. The reuse of this site for residential accords with National planning policies which seek to reuse brownfield/previously developed sites in advance of greenfield sites. This soon to be vacant site can be reused to provide a good level of dwellings that will contribute to the local housing need. Furthermore, the original building could be retained and converted as part of the development.

3.1.2 Hazel Grove Residents Association

Concern/Objection to DS06 Royal Junior School

- Allocation of DS06 is premature pending the outcome of the Red Court planning application appeal.
 - At the present time, Waverley BC is able to demonstrate a 5-year housing land supply. The draft allocation results from a desire to find a replacement for the previously proposed Red Court site. That site, which is not within the Surrey Hills AONB, attracted high levels

of objection, and a related planning application was refused. An appeal is to be heard in December 2021 and a decision will be made before the LPP2 Examination.

- DS06 is unsuitable/ deliverable for housing development.
 - Site is unsuitable when assessed against the criteria in the draft allocation and other national and local plan policies.
 - The allocation depends on successful co-location of RJS with the Royal Senior School on its site in Farnham Lane.
 - This is unlikely to be acceptable in planning terms given a limit on pupil numbers owing to the narrow access and several environmental policy designations that would limit the opportunity for any new buildings.
- DS06 only includes a small component of previously development land.
 - Site allocation assumes the RJS site is previously developed land: it is not. Only about 7% of the site is occupied by buildings.
 - Housing development would have a significant adverse impact on the open parkland landscape of the site which lies within the Surrey Hills AONB (a nationally important designation) and an Area of Great Landscape Value.
 - Should an allocation be brought forward it should be limited only to the built part of the site, with a capacity of about 30 units, and subject to stricter development criteria.
- Impact on biodiversity.
 - Adverse biodiversity impacts both within the site (its woodland, mature trees, established hedgerows, and ponds), and in the wider area (within the Wealden Heaths Special Protection Area zones and therefore requiring the provision of suitable alternative natural greenspace to lessen the recreational impact of new residents).
- Sustainability performance concerns.
 - The site located outside the established settlement boundary and remote from local services.
 - Access would be dominated by car and the opportunity for encouraging alternative means is limited by geography and the A3 double roundabout.
 - This makes the site unsuitable for affordable housing whose occupants are less likely to have access to a car.
 - In addition, the poor noise and air quality environment adjoining the A3 would be incompatible with housing development.

3.1.3 Tower Road and Pinebank Association

Suggest

- Allocation of DS06 is premature pending the outcome of the Red Court planning application appeal.

Concern/Objection to DS06 Royal Junior School

- The development is not suitable as it is AONB and within Wealden Heaths Special Protection zones
- Only a very small part of the site has been developed and rest is greenfield land.
- The Hindhead infrastructure cannot support such a development.
 - Hindhead is already supporting the need for new housing on the Andrews and Barons sites.
- Site is located outside the settlement boundary and therefore there is a logical need to maintain the A3 as the settlement boundary.
- The development is remote from any local services
- Poor public transport links site only accessible by car.
 - Poor pedestrian accessibility and crossing facilities.

3.1.4 Scotlands Close Interim Residents Community Group

Support

- Haslemere settlement boundary changes.
 - As it now complies with the adopted Haslemere Neighbourhood Plan, as well as protecting the woodland in Haslemere is vital for the climate protection in line with COP 26 and should actually be replanted with additional trees rather than housing.
 - The Settlement Boundary also preserves the important mature greenfields on the edge of the settlement.
 - Protecting these spaces from development is vital enabling the focus for development to be on underused or vacant brownfield sites, in accordance with the NPPF.
- Removal of the Red Court site.
 - Any development of this site will have a tremendous adverse impact on the landscape, the setting of the AONB and the South Downs National Park. The local infrastructure cannot absorb the additional number of people and cars that will be using this site, and the proposed highway changes to the surrounding area will have a severe adverse impact on the character of the area. The deletion of this site is therefore strongly supported.
- The amended dwelling yields on Haslemere site allocations.
- Inclusion of DS06 Royal Junior School site.

- The site is brownfield and although AONB is maintained mown fields so containing low biodiversity and wildlife and thus little impact on the climate, but consideration should be given to the AONB green areas as stated in the Haslemere Neighbourhood Plan.
- This site is to become vacant when the school relocates its pupils to the original and main school site on Farnham Lane and has well established easy access links into and out of the site.
- The reuse of this site for residential accords with National planning policies which seek to reuse brownfield / previously developed sites in advance of established greenfield sites.
- This soon to be vacant site can be reused to provide a good level of dwellings that will contribute to the local housing need.

3.2 Haslemere Vision

Support

- The removal of the Red Court site.
 - This accords well with the principles and policies set out in the Haslemere Neighbourhood Plan.
 - It also demonstrates the incorporation of local knowledge, local democracy, and local consultation into the Local Plan process.
- Inclusion of DS06 Royal Junior School site.
 - Subject to a development built on land on which there were previously constructed buildings or hardstanding.
 - Accords well with the HNP principles to use brownfield sites over greenfield.
 - It should be noted that the character of the AONB in which it sits has changed significantly since its 1958 designation (in particular with the construction of the neighbouring A3 carriageway with associated slipways and roundabouts) and the site is surrounded by roads, residential development and school buildings with associated facilities.

Suggest

- Haslemere Town sites require higher densities/ dwelling yields.
 - Housing densities on crucial town sites do not comply with Haslemere Neighbourhood Plan Policy H2 (pages 20,21 & 22).
 - Consideration should be given to increasing the housing numbers on these sites as lower densities here exacerbate the need to build outside the settlement boundaries and/or on greenfield sites – if not now, then in the future.
- DS07 Fairground Car Park, Wey Hill and DS01 Haslemere Key sites.

- Council to include community groups from the start of the planning process for the development of these sites.
- DS06 Royal Junior School site.
 - Whilst generally supporting the site and the policy provisions b to h, suggest that the proposed dwelling yield figure seems high considering the special character of the High Pitfold area and proximity to Wealden Heaths II SPA.
 - Allocation does not make full consideration of the Haslemere Neighbourhood Plan on 1) densities (see Policy H2) and 2) its guidance viz a viz inclusion of commercial space in areas with easy access to the A3. See the HNP– Policy H14, Context & Justification, para 3.91 as well as Opportunity no. 2 on page 63.
 - Suggest that with the site’s unparalleled access to the A3, the site should consider the need for commercial space in the area. If a smaller area of the Royal School site was used for housing, part of the site could be devoted to commercial uses which require access for larger vehicles (difficult to accommodate with the Victorian railway bridges with which Haslemere roads are constricted). This could reduce the need for traffic through the congested heart of Haslemere, with particular reference to the congestion levels through the Wey Hill and Railway Station areas.

Concern/Objection

- Haslemere settlement boundary inconsistencies with the HNP.
 - Whilst supporting the removal of the Red Court site from within the settlement boundary, there remain differences (e.g., at Beacon Hill) between the boundary at Map 17 and the settlement boundary as defined by the Haslemere Neighbourhood Plan (HNP).
 - Map 17 Haslemere should be identical to Figure 1a Haslemere Settlement Boundary on Page 19 of the Haslemere Neighbourhood Plan.
- Affordable housing on DS04 Wey Hill Youth Campus.
 - The affordable housing allocation for DS04 has been removed despite the need referenced in the Key Challenges section of the Haslemere Neighbourhood Plan (para 1.18) as well as its Policy H5 (para 3.26) and paragraph 62 of the NPPF. Suggest including affordable housing allocations on sites DS04.

3.3 The Haslemere Society

Support

- The removal of the Red Court site and the change to the Haslemere settlement boundary.
 - This accords well with the principles and policies set out in the Haslemere Neighbourhood Plan.
 - It also demonstrates the incorporation of local knowledge, local democracy, and local consultation into the Local Plan process.
- Inclusion of DS06 Royal Junior School site.
 - Subject to a development built on land on which there were previously constructed buildings or hardstanding.
 - Accords well with the HNP principles to use brownfield sites over greenfield.
- DS07 Fairground Car Park site's lower dwelling yield change.
- DS01 Haslemere Key site's lower dwelling yield change.

Suggest

- DS06 Royal Junior School
 - Hindhead Court (a fine Arts & Crafts house) should be retained as part of any development proposal.

Concern/Objection

- DS08 The Old Grove
 - The number of dwellings on this site is too high.

NATURE AND THE ENVIRONMENT INTERESTS

4.1 Surrey Hills AONB Board

Support

- The removal of the Red Court site and the subsequent change to the Haslemere settlement boundary.
- DS06 Royal Junior School.
 - Support for all of the policy provisions, particularly provisions b) and c) requiring the AONB designation to be respected.
- DS08 The Old Grove dwelling yield change.
 - Old Grove has a common boundary with DS06 Royal Junior School site and abuts the A3. This is a previously developed site in this case with extensive building site coverage.
 - Acknowledge proposed number of dwellings has increased from 18 dwellings previously proposed now to 40 dwellings.
 - The site lends itself to achieving much needed smaller dwellings. Depending upon the size of dwellings and the form, design and quality of development consider that 40 dwellings should be achievable without harming the AONB. The impact of the development would be localised to the site itself especially as there is high fencing onto the A3 and because of the lie and nature of surrounding land.

Suggest

- DS06 Royal Junior School lower dwelling yield.
 - Whilst there is support for DS06, the Surrey Hills AONB suggest a revised lower number of dwellings from 90 to 80.
 - The Surrey Hills AONB Planning Adviser provided AONB planning advice to the Waverley Planning Department and the consultants on the Royal School redevelopment proposals.
 - Acknowledge much will depend upon the size of the dwellings, the layout, form and quality of the development.
 - Even if no more than about 80 dwellings on the site were to be satisfactorily achievable there would still be a total of 324 dwellings exceeding the latest outstanding Local Plan Part 1 requirement for 316 dwellings for Haslemere.

Concern/Objection

- Haslemere settlement boundary inconsistencies with the HNP.

- Whilst supporting the removal of the Red Court site from within the settlement boundary, there remain differences between the settlement boundary as defined by the Haslemere Neighbourhood Plan (HNP).
- CPRE prefers the HNP approved version which sets the boundary to reflect the existing built area and exclude greenfield AONB/AGLV sites.

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