ANNEXE 3

Overview of the Main Issues raised in the Consultation on the Addendum to the Pre-submission version of LPP2 and the Council's Response

1.0 Introduction

This report sets summarises the issues raised on the main modifications set out in the Addendum to the Pre-submission version of LPP2, together with the Council's response. The report contains the following sections:

- The removal of Red Court, Scotland Lane, Haslemere as a housing allocation in LPP2 and the consequential change to the Haslemere settlement boundary
- The allocation of a new housing site at the Royal School, Hindhead and increasing the yield on the Old Grove, High Pitfold as a result of the removal of the housing allocation at Red Court, Scotland Lane
- The change to yields of existing housing allocations in Haslemere
- The need for additional allocated housing sites to meet the strategic housing requirement

2.0 The removal of Red Court, Scotland Lane, Haslemere as a housing allocation in LPP2 and the consequential change to the Haslemere settlement boundary.

2.1 The issues raised as a result of the main modifications removing Red Court as a proposed housing allocation and the consequential change to the settlement boundary in LPP2 are summarised below.

2.2 The main modifications attracted support for the following reasons:

- The site is a greenfield site outside the settlement boundary and is contrary to agreed national, local and neighbourhood planning policy.
- There are other available brownfield sites in Haslemere that are more appropriate for housing, and these should be prioritised over greenfield sites.
- Development on this site will have a detrimental impact on biodiversity and on climate change.
- Development on this site would be harmful to the AGLV and the setting of the adjoining AONB and the South Downs National Park.
- The Red Court site is in the Area of Great Landscape Value and has been included in Natural England's (NE) Area of Search for its consultant landscape assessors to advise whether it should be included in the new Surrey Hills Area of Outstanding Natural Beauty (AONB). Specialist landscape consultants reporting to NE in 2013 had already advised the site met the criteria for AONB designation and recommended the site as an AONB candidate area.
- Development would have an adverse impact on the Grade II Listed Building on the site.
- Additional housing cannot be supported by local infrastructure.
- Development would have a detrimental impact on the character of the area through an increase in traffic on the local road network.

2.3 The removal of the site as a proposed housing allocation and the consequential change to the settlement boundary in LPP2 attracted objections for the following reasons:

- The decision to exclude the Red Court site from the settlement boundary in the Neighbourhood Plan is political and was not made for planning reasons.
- It was not apparent that some of the supporting evidence for the Addendum was available.
- The site lies outside an AONB and is more appropriate for housing development than sites within the AONB such as The Royal Junior School and the Old Grove in Hindhead. There is no harm to the landscape.
- There are no constraints to the delivery of housing development on the site, no harm of heritage assets and no issues have been raised regarding water quality.
- The development of the site is more certain than the development of the other allocated sites in Haslemere which have constraints and therefore the housing requirement in Haslemere in LPP1 cannot be met.
- Development of the site will provide certainty that it will contribute to the housing required for Haslemere.
- Constraints to other sites in the Borough means that the Council cannot meet its Local Plan Part 1 housing requirement. It also cannot demonstrate five years' worth of housing land supply.
- The site has good access to public transport, services and facilities.
- The development will provide suitable mitigation for its impact on the Wealden Heaths SPA, whilst mitigation on the other allocated sites is still not clear.
- There were no technical objections from statutory consultees and the officer recommendation on the recent planning application was for approval.

Council Response

2.4 The Land at Red Court was originally proposed as a housing allocation in the Pre-Submission version of LPP2 November 2020 because the housing requirement set out in LPP1 for Haslemere could not be met on available urban and rural brownfield sites. It was therefore, considered at the time that the site was the most appropriate of the greenfield sites that were available for housing allocation. The reasons for removing this site from LPP2 as an allocation and allocating The Royal Junior School and an increased yield to the Old Grove were set out in the report to Council in September 2021 to decide whether the Council should undertake the consultation on the Addendum.

2.5 Since the consultation on the Pre-Submission version of LPP2 November 2020, an application for residential development on the land at Red Court (WA/2020/1213) was refused on 23rd July 2021. The refusal of the planning permission by the Council included the grounds that the proposal would result in harm to the intrinsic character and beauty of the Countryside and fail to respect the landscape character of the Area of Great Landscape Value (AGLV). The proposal was also considered to harm the setting of the Area of Outstanding Natural Beauty (AONB). Accordingly, the proposal would therefore be contrary to Policies RE1 (Countryside beyond the Green Belt) and RE3 (Landscape Character) of the Local Plan Part 1 (2018), along with guidance contained in the NPPF.

2.6 As a result of this decision by the Council, it is no longer considered appropriate for the site to be included as an allocation in LPP2. However, the issue for the Council

when it was considering whether to submit the pre-submission version of LPP2 for examination back in September 2021 was that the removal of Red Court from the plan would mean that that there would not be enough housing being allocated to meet the housing requirement in LPP1. However, representations on the consultation of the Pre-Submission version of LPP2 November 2020 provided evidence of the availability of other brownfield sites that would help meet the housing requirement for Haslemere in LPP1. These were the site at the Royal Junior School and an extended site area for an existing proposed allocation at the Old Grove, High Pitfold, Hindhead. An assessment of the sites demonstrated their suitability for allocation in LPP2.

2.7 The decision to modify LPP2 to propose the modifications to the allocations in the Addendum has followed due process. Although the Council proposed Red Court as an allocation in the Pre-submission version of LPP2, the decision to remove the site as an allocation, and to publicly consult on this modification as part of an Addendum to LPP2 before LPP2 is submitted for examination, was made on 22nd September 2021. The public consultation included making evidence documents available and lasted for 6 weeks.

2.8 The consequential change to the settlement boundary in LPP2 resulting from changes to the site allocations in the Addendum now excludes Red Court from the settlement. This will be in accordance with the settlement boundary in the recently made Haslemere Neighbourhood Plan which forms part of the development plan for the area.

3.0 The suitability of allocating a new housing site at the Royal School, Hindhead and increasing the yield on the Old Grove, High Pitfold as a result of the removal of the housing allocation at Red Court

3.1 The issues raised as a result of the main modifications to the allocation of the sites for housing are summarised below.

Representations on the Royal Junior School

3.2 The main modification to the allocation of The Royal School attracted support for the following reasons:

- The site is brownfield land that will be vacant when the Royal Junior School is relocated to join the Senior School at the Farnham Lane site.
- Development will not have a detrimental impact on the AONB and heritage assets depending on the size of the dwellings, the layout, form and quality of the development.
- Development can utilise existing buildings and hardstanding.
- The site has good highway access and links, and it is supported by higher capacity roads and other infrastructure.
- Development on the site will have a minimum adverse environmental impact.

3.3 The allocation of the Royal School for housing has raised the following objections:

- The site lies outside a settlement boundary and is contrary to Policy SP2: Spatial Strategy of Local Plan Part 1 and the Haslemere Neighbourhood Plan
- Development will have a detrimental impact on the AONB and AGLV, and on the countryside beyond the Green Belt. The allocation of this site is not an appropriate alternative for development to Red Court, Scotland Lane,

Haslemere which has fewer planning constraints than the Royal Junior School site.

- The site is not a brownfield site; a significant proportion of the site is playing fields, open space and woodland. The site is not listed on the Council's Brownfield Land Register.
- Even if it was considered a brownfield site, national policy does not allow for the development of the whole site as it is not completely built-up. The proposed number of homes will not be contained within the existing built-up area of the site.
- Development would have a detrimental impact on biodiversity and protected species including the Wealden Heaths SPA.
- Development would result in an increase in traffic to and from the site that would exacerbate existing congestion, it would place further pressure on the capacity of the local road network, increase pollution and be detrimental to highway safety in the immediate surroundings
- Hindhead and Grayshott do not have sufficient infrastructure to cater for even more additional housing in the local area. Development of the site would increase pressure on infrastructure.
- The provision of housing in Hindhead rather than Haslemere suggests political interference. This may be because it is considered that development in this location would not attract as many objections because there are fewer residents than in the main built-up area of Haslemere.
- There is a disproportionate number of houses allocated in LPP2 for Hindhead compared to its size, infrastructure and access to facilities and services. On this basis the number of new homes allocated for the main built-up area of Haslemere is small.
- The cumulative allocations at the Royal School and the Old Grove will result in an additional 130 dwellings in close proximity which will exacerbate the detrimental impact of development
- Development will result in the loss of the existing sports fields, designated recreation ground and other facilities on the site without replacement. This is inconsistent with the NPPF.
- The merging of the Royal Junior School with the Senior School at the Farnham Road site will increase traffic around Farnham Lane to the detriment of highway safety
- A non-development buffer should be created to protect to non-designated heritage assets
- The constraints to the site make it uncertain that the development will be delivered in the plan period and therefore will not contribute to the housing required in Haslemere

3.4 The following comments have been made:

- Mitigation will be required for potential impacts upon the Wealden Heaths Phase II SPA. As the site is over 49 dwellings it is expected that this will be in the form of SANG which may be challenging to deliver within the allocation given the site's size and noise constraints.
- There is scope for some low-density development on the Royal Junior School site as evidence does not show that it could support 90 dwellings without an unacceptable negative impact upon the AONB. Design and layout considerations should refer to the Surrey Hills Design Guide and Surrey Hills AONB Management Plan. There is a 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)).

- Thames Water have stated that local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development which will require the developer to liaise with them over the need for a detailed drainage strategy with the planning application. Further investigation of wastewater and sewerage also needs to be investigated.
- Development could impact the setting of the Grade II Listed Building at Amesbury School

Representations on The Old Grove

3.5 The increase to the number of dwellings allocated for the Old Grove has attracted support for the following reasons:

- The increase in the number of dwellings proposed for the site will not harm the AONB depending on size, form, design, layout and quality of development.
- The site is a brownfield site with extensive site coverage

3.6 The increase to the number of dwellings allocated for the Old Grove has raised the following objections:

- The provision of housing in Hindhead rather than Haslemere suggests political interference. This may be because it is considered that development in this location would not attract as many objections because there are fewer residents than in the main built-up area of Haslemere.
- Hindhead/Grayshott has less infrastructure and facilities than the main built-up area of Haslemere.
- The site is within the AONB and AGLV, and development is in direct conflict with policies to protect these designations. The increase in the proposed yield of the site is not an appropriate alternative for development to Red Court, Scotland Lane, Haslemere, particularly as this site has fewer planning constraints than the Old Grove site.
- There is a disproportionate number of houses allocated in LPP2 for Hindhead compared to its size, infrastructure and access to facilities and services. On this basis the number of new homes allocated for the main built-up area of Haslemere is small.
- The site is remote and new housing on the site will require more cars because public transport is limited. Development would therefore result in an increase in traffic to and from the site that would exacerbate existing congestion, place further pressure on the capacity of the local road network, increase pollution and be detrimental to highway safety in the immediate surroundings.
- The original allocation for 18 dwelling in the Pre-submission version of LPP2 November 2020 was considered necessary to maintain the site but clearly this was proposed under false pretences.
- The cumulative allocations at the Royal School and the Old Grove will result in an additional 130 dwellings in close proximity which will increase the detrimental impact of development.
- Development would have a detrimental impact on biodiversity including the Wealden Heaths Phase II SPA. It is within a wildlife corridor in the Haslemere Neighbourhood Plan. Mitigation of the impact on the SPA is not clear.

- The constraints to the site make it uncertain that the development will be delivered in the plan period and therefore will not contribute to the housing required in Haslemere.
- The loss of existing facilities on the site.

3.7 The following comments on the Old Grove have been made:

- The increase in dwellings means that mitigation will be required for potential impacts upon the Wealden Heaths Phase II SPA
- 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. There is a 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)
- Thames Water have stated that local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development which will require the developer to liaise with them over the need for a detailed drainage strategy with the planning application. Further investigation of wastewater and sewerage also needs to be investigated.

Council Response

3.8 The Royal Junior School site is within the AONB, and because of this it is recognised as a major adverse effect on the landscape in the Sustainability Appraisal for the Addendum of LPP2 2021 (SA). However, the site is also previously developed land, albeit that the buildings and hard surfaces tend to be concentrated on the northern and eastern parts of the site. The site is also very well screened, particularly from the A3 to the west. The Council's landscape consultant has also assessed the site and concluded that the overall sensitivity in landscape terms is 'Low to Medium Sensitivity'. Having regard to the existing uses, concentration of built form on the site and the existing degree of screening, officers are of the view that, in principle, the site is suitable for residential development in place of existing uses. It is considered that an appropriately designed development of approximately 90 dwellings that would respect the landscape character of the area and the existing built form that covers the site, that provides mitigation for the impact on the Wealden Heaths SPA, would be achievable and is deliverable within the Plan period. It is recognised that it is important that the number of homes is appropriate for the site and its location in the AONB. However, there is no evidence that a development of approximately 90 homes is inappropriate for the site at this stage. The appropriate quantum of houses will be determined by the design and layout of the development. The details of which will agreed through the subsequent process of obtaining planning permission.

3.9 Officers have thoroughly assessed the potential suitability of the site as well as the implications in planning terms of the Junior School being relocated to Farnham Lane. It is recognised that there are potential implications arising from the proposed relocation of the Royal Junior School to the existing Royal School Senior School site on Farnham Lane, Haslemere. One of these is traffic, given the restricted nature of Farnham Lane. However, the site promoters have liaised with Surrey County Council to make arrangements to control vehicle movements to and from the school, notwithstanding the increase in pupil numbers to which SCC have stated that they are unlikely to raise objections to the increase in school numbers at Farnham Lane providing that the mitigation measures are implemented. The Farnham Lane site is

also within the Green Belt and AONB. However, the School believes that it can achieve the relocation through the reuse and replacement of buildings, rather than requiring significant new development.

3.10 The Old Grove was already proposed for an allocation in the Pre-Submission version of LPP2 for 18 dwellings on part of the site. However, since the consultation on the Pre-submission LPP2 November 2020 was carried out, more of the site, which currently provides specialist residential care accommodation and a range of specialist services, has become available for redevelopment. The site was promoted for 40 dwellings as a result of the proposed intensification and reconfiguration of the existing C2 accommodation. Like the Royal Junior School, the site is within the AONB. However, the redevelopment of the site, which is already comprehensively covered by built form, will not have a detrimental impact on the national landscape designation. This assessment is echoed by the Council's landscape consultant who has assessed the site and concluded that the overall sensitivity in landscape terms is 'Low sensitivity'. However, like the Royal School, design of the development must mitigate any impact on the AONB through the detailed planning of the site.

3.11 The NPPF requires Local Plan to have an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence. The Council have assessed all the sites through the SA and a topic paper on site allocations. The SA show that the Royal Junior School, The Old Grove and Red Court perform differently against the SA objectives. The topic paper on Housing Allocations also shows that the three sites differ in their assessment depending on the planning criteria.

3.12 The SA of the Addendum 2021 shows that the Royal Junior School and the Old Grove will have a major adverse effect on the landscape and a moderate adverse effect on sites designated for nature conservation because of the sites' location within the AONB and their proximity to the SPA. The SA for the pre-submission version of the Plan in November 2020 for Red Court on the other hand shows that the site has a moderate adverse effect on the AGLV and the AONB as a result of its location adjacent to the AONB. The SA shows that Red Court has minor adverse effect on designated nature conservation sites. This is because the Royal School and the Old Grove lie within the AONB and within 1km to the Wealden Heaths Phase II SPA, whereas Red Court lies outside but adjacent to the AONB but within the AGLV and further away from the SPA, although still within 5 km. The scoring in the SA is based on objective data and does not consider the existing character of the site. Therefore, the existing impact on the landscape and the SPA, and the mitigation of that impact from development needs to be taken into account.

3.13 One of Natural England's statutory responsibilities is to advise on protecting the landscape. They have expressed concern that 90 dwellings on the Royal Junior School will have a significant potential to impact on the AONB. They also consider that development on both the Royal Junior School and the Old Grove requires exceptional circumstances to be demonstrated for major development in the AONB as required in para. 177 of the NPPF.

3.14 Footnote 60 of the NPPF states that whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. Therefore, it is incumbent on the Council to come to a view on this. Natural England gives great weight to Surrey Hills AONB Partnership

but in their representation the AONB Board's Planning Adviser has not stated that the development is 'major development'. It is recognised that the allocations of the Royal School and the Old Grove are proposed for 90 and 40 dwellings respectively and therefore the amount of development is significant. However, both of the sites are well screened brownfield sites that comprise both built form and extensive areas of hardstanding that are currently used for educational and residential care. It is therefore considered that the impact of redevelopment of the sites on the AONB is not 'major development' when assessed against the impact that already exists from the use and form of the land and buildings. As stated above the Landscape Assessment concludes that the Royal Junior School site has a medium to low sensitivity to development and the Old Grove, low sensitivity.

3.15 If, however, it is deemed to be major development, then it is considered that exceptional circumstances exist and that the redevelopment of the sites are in the public interest. LPP2 must meet the housing requirement that has already been adopted for Haslemere through LPP1. However, there are not enough available suitable brownfield sites within the settlement boundary to do this. Therefore, the Council has had to identify sites outside the settlement boundary. Although there are some sites that lie outside the settlement boundary that are not within the AONB, they are greenfield sites and given their proximity to the AONB, development will have an impact on its setting. However, both Royal Junior School and the Old Grove are brownfield sites with existing built form and significant screening. Therefore, it is considered that appropriately designed development will have a limited impact on the AONB

3.16 The Surrey Hills AONB Board objected to the housing allocation at Red Court when it was allocated in the Pre-submission version of LPP2 last winter because of the concerns about the impact of housing development on the protected landscape. Since they have been made aware of the availability of the Royal Junior School, their planning adviser has been involved in the process of assessing the Royal Junior School and they support its allocation for housing on as it is a previously developed site within the AONB. Their preference is for only 80 dwellings on the site, but much will depend on the details of the size, form, design and quality of the development. As the Old Grove is a previously developed site with extensive building site coverage, the Surrey Hills AONB Board also supports this allocation. However, they also say this will depend on the size, form design and quality of development.

3.17 National policy in the NPPF is to make as much use as possible of brownfield land except where there is conflict with other policies in the framework. Policy SP2 6) of LPP1: Spatial Strategy seeks to maximise opportunities for the redevelopment of suitable brownfield sites. Although the Royal Junior School and the Old Grove lie within the AONB, which national and local policy seeks to protect from harm, the allocation of these two brownfield sites accords with this approach. Both sites already contain buildings which means that there is an existing impact on the landscape. A sensitively designed housing development will provide an opportunity to moderate this impact, details of which will need to be determined at a planning application. As such, although they are within the AONB, the brownfield status of the sites demonstrates their suitability for allocation for housing development in comparison to the greenfield Red Court.

3.18 As it stands, there is no adopted avoidance strategy for the Wealden Heaths SPA, so sites do have to be considered on a case-by-case basis and this is set out in LPP1.

Paragraph 16.28 of LPP1 states "*if a housing proposal is capable of affecting the Wealden Heaths Phase I and II SPAs beyond 400 metres from the site, it will be considered on a case-by-case basis as to whether a project-specific Habitats Regulations Assessment (HRA) is required (this should be assessed at the HRA Screening Assessment stage). The requirement is likely to vary depending on the size of site, the 'in-combination' effects and its distance from the SPA. Larger developments will not normally be acceptable and the total number of dwellings permitted in this zone overall will be closely monitored. Further advice should be sought from and agreed with Natural England*".

3.19 Notwithstanding the absence of a formal avoidance strategy for the Wealden Heaths SPAs, Natural England has expressed the view that as there are some site allocations in LPP2 within 5km of the Wealden Heaths SPA, there would need to be mitigation in some form, including SANG, where appropriate. Within the Local Plan, stronger wording surrounding mitigation of these specific allocations is needed, e.g., the need for some form of mitigation for allocations of 20-49 dwellings and mitigation in the form of SANG for allocations of 49+ dwellings should be specified. Wording should explain that mitigation approaches must be agreed with Natural England and Waverley BC and on a case-by-case basis.

3.20 The HRA for the Addendum concludes that the changes to allocations do not alter the overall conclusions of the LPP2 HRA which considered that no adverse effect would arise because of the measures contained in Policy NE1 of LPP1 and the emerging policy requirements in LPP2. This is in acknowledgement of Natural England's advice that mitigation for the Royal Junior School should be in the form of SANG and that the Old Grove should provide mitigation.

3.21 Natural England express their reservations that SANG can be delivered on the Royal Junior School given its size and noise constraints. However, the promoters of the Royal Junior School are looking to identify on-site measures and are confident that the SANG can be achieved.

3.22 It is also acknowledged that for the sites in Haslemere of 20 more units there may be a need for mitigation and that at this stage none has been identified and agreed with Natural England. However, in order to provide greater certainty that the allocated sites can be delivered, the Council is looking at what mitigation measures can be implemented which includes the feasibility of local open space being used for recreational purposes as an alternative to visiting the SPA. This work is ongoing

3.23 It is recognised that the Royal School and the Old Grove are both more remote from the services in Haslemere and Hindhead than the Red Court site. The SA shows the Royal Junior School to have a minor adverse effect and the Old Grove a moderate adverse effect on promoting sustainable transport use and reducing the need to travel whereas Red Court has a minor positive effect. However, the Royal School and the Old Grove are still close enough to facilities and services in Grayshott and Hindhead and therefore, while the sites do not perform as well as Red Court in relation to this criterion, the distance from them does not make the two sites inappropriate for housing. Furthermore, redevelopment of the sites will provide an opportunity to bring in measures to improve accessibility from them to local facilities and services to encourage trips by foot, bicycle, car sharing, low emission vehicles and public transport.

3.24 The proposed amount of housing allocated to Hindhead in LPP2 is approximately two thirds of the overall housing that the Plan is allocating for the whole of the Haslemere to meet the requirement in LPP1. However, the allocation of sites is based on the requirement in the NPPF that Councils are required to identify sites that are available, suitable and economically viable.

3.25 Policy ICS1 of the adopted LPP1 requires the provision of appropriate alternative community facilities where a proposal results in the loss of facilities. The loss of the school facilities on the Royal Junior School site will be replaced at the Farnham Lane site when the school merges with the Senior School. The allocation for the Old Grove requires the redevelopment of the site to re-provide the existing number of bed spaces that are currently on the site.

3.26 There have been objections to the loss of the playing fields and sports facilities on the Royal School. However, the loss of the playing fields and sports facilities has to be balanced against the need for housing in Haslemere to meet the LPP1 allocation and the limited number of potentially suitable sites. Furthermore, the school have advised that the playing fields are provided for the purposes of the school only. When the Junior School merges with the Senior School, sports provision on the Farnham Lane site will be improved to cater for the additional pupils. Redevelopment of the Junior School also provides an opportunity for some informal recreational facilities through open and green space that would be accessible to the public which hadn't been available before.

3.27 Thames Water's representations show that further work with providing the necessary on wastewater infrastructure on the Royal Junior School and the Old Grove is needed. However, these do not demonstrate that the sites cannot be delivered but that the details of provision will need to be considered through the planning applications. Clearly if it is necessary to upgrade infrastructure in order to connect to the mains drainage then this could affect the timing of the delivery of these sites.

4.0 The change to yields of existing housing allocations in Haslemere

4.1 The changes to the yields at the Haslemere Key Site (DS01), Land at Wey Hill Youth Campus (DS04), Haslemere Preparatory School (DS05) and the Fairground Car Park (DS07) have attracted support.

4.2 The objections have mainly been focused on the constraints to delivery of these housing allocations. These have been raised mainly by the promoters of sites omitted from LPP2 but also from Haslemere Town Council. Some of the comments have questioned whether the sites can be delivered in the plan period or within five years. In some cases, it is questioned whether housing on the site can be delivered at all. The delivery concerns have been made by housing site promoters are partly because of Natural England's advice on the pre-submission version of LPP2 November 2020 that mitigation of the impact on the Wealden Heaths SPA for sites now needs to be specified.

4.3 Other concerns on the Haslemere Key Site include the lack of evidence that the site can be delivered, the physical and legal constraints, the lack of alternative sites for existing uses to relocate to, constraints to the delivery of custom/self-build and affordable housing the availability of more suitable sites, fragmented land ownership, the need for a Compulsory Purchase Order and the need for heritage protection.

4.4 For the Wey Hill Youth Campus, concerns have been raised on the site's higher flood risk and potentially contaminated land. Furthermore, it is not clear how the Council can be confident in being able to re-locate the community groups. For the Haslemere Preparatory School it has been pointed out that there is no progress on the site since planning permission was given.

4.5 There has been objection from the Town Council to the adjusted lower yield on the Fairground Car Park in that it is contrary to the approach in the Haslemere Neighbourhood Plan that sites in central locations should be built at high densities to ensure that greenfield sites are not needed to meet Haslemere's housing requirement.

4.6 Comments have been made by promoters of housing sites omitted in LPP2 on the other Haslemere allocations that are not subject to the main modifications in the Addendum. The basis for these comments being that these proposed allocations are also not deliverable because of constraints. Therefore, the housing required in LPP1 for Haslemere and the whole of the Borough will not be met, and other sites should be allocated.

Council Response

4.7 Except for the Haslemere Preparatory School, the Heights, where the yield reflects the recent planning permission, all yields on the allocations that have been modified in the Addendum have been reduced. This in the light of new evidence that has become available since the consultation on the Pre-submission version of LPP2 in November 2020 or through concerns raised about the amount of development that can delivered on the site. This is so that the amount of housing that is expected to be delivered in the plan period on these sites is more realistic. Although the yields have changed, these sites are all brownfield and the comments made on their inability to deliver housing in the plan period do not raise any new issues from those that were raised in the previous consultation last winter, although in some cases it is recognised that delivery will be later in the plan period.

4.8 The consultation on the Addendum also raised concerns that the reduction in yields on the other allocated sites is not an efficient use of land and puts pressure to release greenfield sites for housing. Therefore, they should be built at higher densities as set out in Haslemere Neighbourhood Plan. Whilst it is acknowledged that the Policy H2 of the Haslemere NP states that higher densities will be supported, including 75 dwellings per hectare with 1km of the railway station, the amount of housing for each site in LPP2 is based on an assessment of what the site can realistically deliver rather than the application of a broad principle. As these are brownfield sites, more housing on the sites than the yields set out in LPP2 may be feasible subject to the planning application process. However, it would be inappropriate for the plan to over rely on higher numbers to meet the housing requirement without evidence that this number can be achieved.

5.0 The need for additional allocated housing sites to meet the strategic housing requirement

5.1 Aligned to representations that the allocated housing sites are not deliverable and that suitable alternative sites should be allocated, are representations that the

Council's performance on delivering homes is inadequate. These objections point to evidence that there has been a shortfall of housing up to now. The comments state that going forward, evidence shows that there will not be enough housing to demonstrate a five-year housing land supply and to meet the housing requirement over the plan period. This justifies additional housing sites being allocated to those already proposed. This need is exacerbated when the standard method for assessing housing needs in national policy is used. Representors have therefore promoted their sites to either replace the proposed allocations or to boost supply. The sites that have been promoted are not only in Haslemere but also in Witley/Milford, Farnham, Alfold, Chiddingfold and Wonersh.

Council Response

5.2 Other available sites have been promoted for housing development in Haslemere through the consultation on the Addendum in addition to the Land at Red Court. Land East of Longdene House, Land North of Haslemere Saw Mills, Longdene Field and Land South East of Haslemere Water Treatment Works had been identified for allocation in the preferred Options for LPP2. However they were subsequently considered inappropriate for allocation in the pre-submission version of LPP2 because they were greenfield sites within the AONB or, as in the case of Land South East of Haslemere Water Treatment Works, in the "AGLV treated as AONB". The SA for the pre-submission version of LPP2 November 2020 shows that development on these and other Haslemere sites promoted for housing will have a major adverse effect on landscape and townscape and the Housing Allocations Topic Paper reflects this. The responses to the consultation on the Addendum do not provide any new evidence that changes this assessment. A new site has been promoted at Dene End Farm, Midhurst Road, Haslemere. This site lies outside the existing settlement boundary by more than 100m, is predominantly greenfield land and is also located within the AONB and AGLV. As a result of such constraints, it is considered unsuitable for housing development.

5.3 Other Haslemere sites have been promoted for allocation in LPP2 because promoters of these sites consider that the delivery of the allocated sites in Haslemere is constrained and therefore the Council needs other sites to meet the perceived shortfall in housing to meet the housing requirement in LPP1 and to meet five years' worth of housing supply. However, the consultation on the Addendum also attracted sites for allocation in settlements that LPP2 is not allocating sites for. These are settlements where either the housing requirement set out in LPP1 has already been met or that the Town/Parish Council is or has undertaken site allocations as part of the settlement's neighbourhood plan.

5.4 To change the amount of housing required for the Borough and where it should be distributed goes beyond the role of LPP2, which provides the detail to the adopted strategy in LPP1. To provide for housing in LPP2 in those settlements where the community has decided to undertake housing allocations through its neighbourhood plan would undermine that process. If there is evidence that sites cannot be delivered in accordance with the amount and location of housing in LPP1, then this would necessitate a change to that plan rather than delivery through LPP2. The NPPF states that a review of a local plan, to decide whether it needs to be updated, should be undertaken at least once every five years. Therefore, as LPP1 was adopted in February 2018, the review to decide whether LPP1 should be updated, must be completed by February 2023. That review process will consider both the

delivery of the housing required to meet the LPP1 requirement, and any changes in the need for housing arising from the latest Government methodology.