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17th June 2022

Dear Sir/Madam,

BY EMAIL

NHS Property Services (NHSPS) – Hearing Statement

Waverley Local Plan Part Two – Independent Examination

This hearing statement specifically addresses the following Main Matters and associated questions:

Matter 4: Settlement Boundaries and Development in Rural Areas

- Issue (i): Are the settlement boundaries set out in the LPP2 justified and consistent with national policy?
 - Question 3: Are the settlement boundaries consistent with the Framework insofar as it requires planning policies to recognise the intrinsic character and beauty of the countryside, and to identify opportunities for villages to grow and thrive?

Matter 6: Housing Requirements and General Supply Matters

- Issue (i): Are the settlement housing requirements set out in LP2 underpinned by relevant and up-to-date evidence?
 - Question 1: With reference to paragraphs 7.1 to 7.5, Tables 2 and 3, and Appendix 11 of the 'Council's response to LPP2 Inspector's Preliminary Matters', and related suggested MMs, are the housing requirements for the following settlements underpinned by relevant and up-to-date evidence?
 - c. Witley (including Milford)
- Issue (ii): Does the LPP2 set out a positively prepared and justified strategy for meeting housing requirements established in LPP1?
 - Question 2: Do the site allocations included in the Plan provide an appropriate strategy for meeting housing requirements set out in LPP1 taking into account reasonable alternatives; and has a robust and justified approach to site selection been carried out based on proportionate evidence?

1. Introduction

NHSPS own the freehold of the Milford Hospital site as identified in Figure 1 below, outlined in red (hereafter the 'site'). NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

We (NHSPS) write in relation to Milford Hospital, which we have previously submitted as a suitable site allocation for inclusion within the proposed Local Plan Part Two. This Hearing

Statement has been prepared and is submitted to you in advance of the Hearing sessions, due to take place July/September 2022.

This Statement follows duly made representations at the Regulation 19 stage of the Waverley Local Plan Part Two (LPP2), and should be read in conjunction with our previous representations.

2. Outstanding Matters

This statement should be read in conjunction with our previous representations, and seeks to answer the relevant parts of Matters 4 and 6 in relation to the omission of Milford Hospital as a site allocation, and the continued inclusion of this site within the Green Belt.

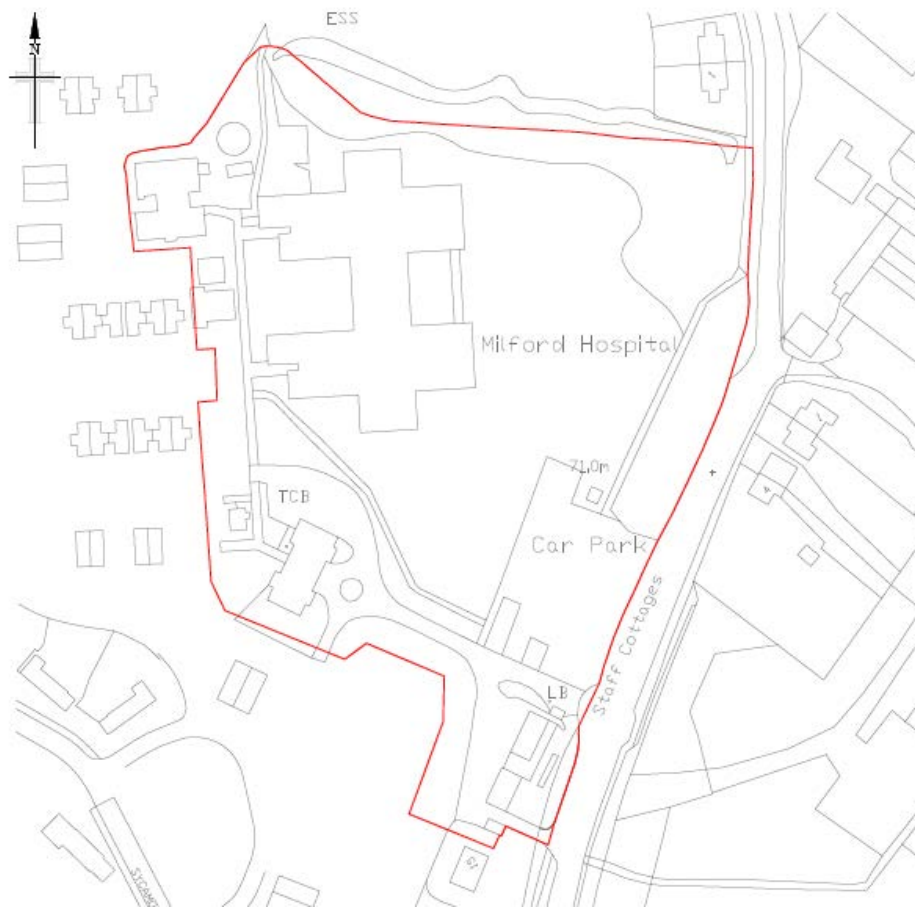


Figure 1: Milford Hospital Site, Tuesley Lane, GU7 1UF

2.1. Milford Hospital Site Context

The Milford Hospital site is located within the Metropolitan Green Belt between Milford and Godalming, approximately 1.25km west of Milford Village Centre and 2km south west of Godalming Town Centre. The site measures approximately 0.44ha and currently accommodates a large two-storey building, and additional ancillary buildings. Vehicular access to the site is gained via Tuesley Lane to the east and via Sycamore Avenue to the north. An area of hardstanding car parking is located to the south east of the site.

The site is a previously developed brownfield site within the Green Belt, and has become surrounded a significant amount of built form to the to the north, west and south in the form of new residential dwelling houses, and large farm buildings to the east.

The site lies within 5km of the Wealden Heaths SPA, but outside both the Surrey Hills Area of Outstanding Natural Beauty and the Area of Great Landscape Value. There are two bus stops located approximately 200m north of the site, offering services towards Godalming and Guildford. Milford Rail Station is located under 1km to the south west of the site via an existing footpath, offering regular services towards London Waterloo, Haslemere and Portsmouth and Southsea.

There is an opportunity to make more effective use of this site. This could come forward in the form of new/improved health facilities, alongside the release of any surplus parts of the site for alternative uses (including housing and/or care home uses). The existing Green Belt designation serves as a significant constraint to the provision of new/improved health accommodation, as well as preventing the NHS from making the best use of a previously developed site surrounded by new residential dwellings.

2.2. National Planning Policy Framework (2021)

The National Planning Policy Framework (NPPF) is the preeminent national policy; in law, regard must therefore be had to it. In summary, the following paragraphs of the NPPF are of particular relevance to the Local Plan making process, and should be complied with:

- a. Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. They should be consistent with the principles and policies set out in the NPPF, including the presumption in favour of sustainable development (Paragraph 11).
- b. Proposed housing supply must meet evidential need for housing of all types, including a 5% buffer for five year housing targets (or 20% in cases of persistent under delivery), these targets must be deliverable. The Council must identify a supply for years 6-15 which is specific and developable (Paragraphs 67 and 73).
- c. Local Plans should be aspirational but realistic. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan (Paragraph 16).
- d. Local Plans should identify opportunities for villages to grow and thrive (Paragraph 79).
- e. The Inspector's primary task will be to consider the soundness of the submitted plan, this will be assessed against the following soundness criteria (Paragraph 35):
 - **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic matters; and
 - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Housing White Paper (February 2017) urges local authorities to make more land available for homes in the right places by maximising the contribution from brownfield land, releasing more small and medium sized sites.

2.3. Overview of the Waverley Pre-Submission Consultation Document

The Local Plan Part 2 (LPP2) builds upon the strategic policies set out in the Local Plan Part 1 (LPP1), adopted in February 2018. LPP2 relies on the objectively assessed housing need that was identified during the preparation of LPP1. LPP2 does not propose to deliver any housing above this requirement. Thus, LPP2 allocates housing to meet the LPP1's annual housing requirement of 590 dwellings per annum, resulting in 11,210 additional homes over the 2013-2032 plan period. However, this requirement does not take into account the minimum estimates of local housing needs set out through the DCLG's 2018 and December 2020 standardised housing methodology, which state that the local housing need for Waverley is significantly higher, at 679 dwellings per annum or 12,901 dwellings over the plan period.

LPP2 states that a significant proportion of the established housing requirement for 11,210 additional homes has either been completed, has planning permission or has already been allocated, and therefore the emerging Plan only allocates land for the residual requirement. The Plan asserts that this residual requirement consists of 320 homes to be allocated in Haslemere, and 203 homes to be allocated in Witley and Milford. Any unmet housing requirements in other parishes are proposed to be allocated through neighbourhood plans.

The Council accept that they do not have enough land to meet the identified objectively assessed need in Milford and Witley, and thus selected releases of Green Belt land will be made through LPP2.

The Council prepared a suite of evidence base documents to inform the emerging Local Plan Parts 1 and 2. Evidence base documents of relevance consist of the following:

- West Surrey SHMA – September 2015
- Waverley Green Belt Review – August 2014
- Landscape Report – August 2014
- Green Belt Settlement Boundary Review Topic Paper – November 2020
- Land Availability Assessment – November 2020
- Green Belt Site Appraisals – August 2020
- Housing: Numbers, Site Assessments and Allocations Topic Paper – November 2020

The Council will utilise these documents to allocate land within the Borough for the development of homes, infrastructure and services.

3. Specific Matters – Inspector Questions

Matter 4: Settlement Boundaries and Development in Rural Areas

Inspector Questions

Q.3 Are the settlement boundaries consistent with the Framework insofar as it requires planning policies to recognise the intrinsic character and beauty of the countryside, and to identify opportunities for villages to grow and thrive?

Matter 6: Housing Requirements and General Supply Matters

Inspector Questions

Q.1c With reference to paragraphs 7.1 to 7.5, tables 2 and 3, and Appendix 11 of the 'Council's response to LPP2 Inspector's Preliminary Matters', and related suggested MMs, are the housing requirements for Witley (including Milford) underpinned by relevant and up-to-date evidence?

Q.2 Do the site allocations included in the Plan provide an appropriate strategy for meeting housing requirements set out in LPP1 taking into account reasonable alternatives; and has a robust and justified approach to site selection been carried out based on proportionate evidence?

Each of these matters is considered separately below.

3.1. Matter 4, Q3 - Are the settlement boundaries consistent with the Framework insofar as it requires planning policies to recognise the intrinsic character and beauty of the countryside, and to identify opportunities for villages to grow and thrive?

NHSPS are the freehold owners of the site Milford Hospital site (see Figure 2 below).

The site is currently located within the Green Belt, but due to the existing built form would represent previously developed brownfield land, with considerable existing built footprint. Similarly, the surrounding context has changed significantly in recent years, with the introduction of significant new built form to the north, west and south of the site in the form of new residential dwellings. The site is also located adjacent to the large agricultural buildings at Tuesley Farm to the east.



Figure 2 Milford Hospital Site in context

In preparation for the Local Plan Part 1, the Council undertook a Green Belt Review (2014) which assessed various parcels of Green Belt land within the district. The site, and land to the west and south of the site, was included within parcel C25. This parcel was identified contributing significantly towards the purposes of the Green Belt. This contribution related largely to the aims of checking the sprawl of Godalming and preserving the south of Godalming's historic setting. The site is not included within any additional work regarding the Green Belt (Green Belt Settlement Boundary Review (2020), Landscape Report (2014), or Green Belt Site Appraisals (2020)). We would request that the Milford Hospital site is included as part of an updated Green Belt Boundary Review and Site Appraisals process.

The context of this parcel of land has changed substantially since the 2014 Green Belt Review, and the site no longer contributes to the defined role of the Green Belt. Most significantly, the site is now surrounded by residential development, granted under application (WA/2012/1592). This development of 104 homes has resulted in a considerable amount of built form, significantly reducing the area's contribution to the Green Belt.

The site is previously developed land, within an established residential area. The site is located within walking distance of both Milford Village Centre and Godalming Town Centre. Additionally, the site benefits from easy walking access to bus and rail services. Given the location and character of the site, and its previously developed status, we do not consider that it contributes to the aims of the Green Belt. This site should therefore be removed from the Green Belt and added to the settlement boundary of Milford. The site should be allocated for new/improved health facilities and/or the provision of alternative uses (including housing and/or care home uses) on any parts of the site declared as surplus to the operational healthcare requirements of the NHS.

The site, as well as a wider area, was previously covered by allocation RD6 in the previous Local Plan (2002), this Plan was superseded by the LPP1 in 2017. Allocation RD6 identified the site as a major developed site in the Green Belt, which was suitable for residential redevelopment.

The site does not contribute to the purposes of the Green Belt and is suitable for redevelopment. Without this change to Green Belt and settlement boundaries, this could prevent new/improved health accommodation coming forward, as well as preventing the NHS making optimal use of a previously developed site already surrounded by built development.

3.2. Matter 6: Q.1c With reference to paragraphs 7.1 to 7.5, tables 2 and 3, and Appendix 11 of the 'Council's response to LPP2 Inspector's Preliminary Matters', and related suggested MMs, are the housing requirements for Witley (including Milford) underpinned by relevant and up-to-date evidence?

The plan proposes to deliver the identified housing requirement through the spatial strategy set out in LPP1, prioritising development within the towns and villages in the top three tiers of the Settlement Hierarchy, this includes the village of Milford. The villages of Chiddingfold, Elstead, Milford and Witley will also be accommodating some growth through the removal of appropriate land from the Green Belt.

The plan allocates three housing sites in Milford and Witley, these sites are anticipated to deliver 204 additional dwellings, against an outstanding requirement of 191. Land has been allocated for removal from the Green Belt due to the limited opportunities to accommodate development on previously developed land within the parish.

Whilst the allocations set out within the emerging LPP2 are anticipated to deliver the residual housing requirement for this location, this requirement does not take into account the

standardised housing methodology, which identifies a significantly higher requirement for Waverley Borough. The allocation of further sustainable sites within Witley Parish should be considered, in order to provide for this established housing need of 679 dwellings per annum. The Milford Hospital site represents a sustainable, previously developed site, which could contribute significantly to meeting this need.

3.3. Matter 6: Q.2 Do the site allocations included in the Plan provide an appropriate strategy for meeting housing requirements set out in LPP1 taking into account reasonable alternatives; and has a robust and justified approach to site selection been carried out based on proportionate evidence?

As outlined above, whilst LPP2 provides sufficient housing allocation to meet the housing requirement set out in LPP1, a significant additional need is identified through the standardised housing methodology.

The site is previously developed land, within an accessible and established residential area. The site is surrounded by a significant amount of built form to the north, west and south in the form of new residential dwelling houses, and large farm buildings to the east.

The site lies within 5km of the Wealden Heaths SPA, but outside both the Surrey Hills Area of Outstanding Natural Beauty and the Area of Great Landscape Value. Whilst the site lies within an area of Green Belt, it's contribution to the Green Belt is significantly limited by the surrounding built form.

There are two bus stops located approximately 200m north of the site, offering services towards Godalming and Guildford. Milford Rail Station is located under 1km to the south west of the site via an existing footpath, offering regular services towards London Waterloo, Haslemere and Portsmouth and Southsea.

There is an opportunity to make more effective use of this site. This could come forward in the form of new/improved health facilities, alongside the release of any surplus parts of the site for alternative uses (including housing and/or care home uses). The existing Green Belt designation serves as a significant constraint to the provision of new/improved health accommodation, as well as preventing the NHS from making the best use of a previously developed site surrounded by new residential dwellings.

The approach to site selection cannot be considered robust, justified, or consistent with national policy, if it results in the omission of sustainable brownfield sites, which are suitable and available for development.

The Milford Hospital site is sustainable, brownfield land which is suitable for redevelopment. The allocation of this site would go some way in enabling Waverley Borough to contribute to the substantial unmet need identified through the standardised housing methodology calculations.

NHSPS therefore object to the omission of the Milford Hospital site as a formal site allocation within the emerging Waverley LPP2, and request that this position is reviewed.

4. Site Specific Matters – Site Developability

NHSPS ask that the Inspectorate review the position in respect of “developability” and reconsider the site as a formal allocation within the Emerging LPP2. The Milford Hospital site is confirmed as developable, and had the site been allocated, the allocation would be justified in terms of developability in accordance with the NPPF (2021) as below:

“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”

4.1. Site Availability

NHSPS can say with confidence that the site will be available for development within the middle part of the plan period (6-10 years). The site therefore meets the requirements to be progressed as a formal site allocation.

4.2. Site Suitability

The site comprises previously developed land, in a sustainable and accessible location, within walking distance of both Milford and Godalming town centres, and Milford train station. Whilst the site is currently located within the Metropolitan Green Belt, due to significant changes in the surrounding built form, the site no longer contributes to the aims of the Green Belt. The site's redevelopment would therefore be in accordance with paragraph 119 of the NPPF (2021) which states that *“planning policies and decisions should promote an effective use of land ... in a way that makes as much use as possible of previously developed or ‘brownfield’ land”*.

The site, and the surrounding area, has been previously identified as suitable for residential development by Waverley Borough Council. Site allocation RD6, within the previous Local Plan (superseded in 2017) identified the site as a major developed site in the Green Belt which was suitable for redevelopment.

4.3. Site Achievability

The site constraints have been taken into account in the promotion of this site. The site is constrained by its inclusion within the Metropolitan Green Belt. As detailed above, this site no longer contributes to the aims of the Green Belt, and should be removed to enable the provision of new/improved health accommodation, and allow the NHS to make optimal use of a previously developed site already surrounded by built development.

There are no other known planning constraints that would prevent development of the site, or the site's consideration as a formal site allocation. The site's development is considered to be achievable within 10 years.

5. Site Specific Matters – Proposed Policy Wording

To confirm, NHSPS promoted the site as a site allocation as part of the Pre-Submission stage in January 2021.

Considering the above, NHSPS request the inclusion of a site-specific allocation for the Milford Hospital site which confirms the principle of:

- New/improved health facilities (subject to health commissioning requirements) alongside the provision of alternative uses (including housing and/or care home uses) on any parts of the site declared as surplus to the operational healthcare requirements of the NHS.

6. Summary and Conclusions

NHSPS are disappointed that Waverley Borough has not progressed Milford Hospital as a formal site allocation. We have been unable to identify any clear justification as to why any part of the site was not taken forward as a site allocation.

The process for identifying and allocating sites cannot be considered justified, robust, or consistent with national policy, if it results in the omission of sustainable brownfield sites, which the Council themselves have previously confirmed are suitable for residential development.

The above update of the site's 'developability' should allow the Council and Inspector to review this position and take forward a positive site allocation for the Milford Hospital redevelopment.

These representations identify the site's potential for future development, in accordance with the realignment of the Green Belt. It is evident that the site does not perform against the purposes of the Green Belt set out in the NPPF.

The site is clearly suitable for health and/or residential redevelopment, it constitutes previously developed land in a sustainable location with direct access to local services. The site is developable and will be available in the plan period.

NHSPS therefore object to the omission of the site as a formal site allocation within the Emerging Waverley LPP2, and request that this position is reviewed by the Inspector. Confirmation of the site's developability is provided.

NHSPS look forward to receiving confirmation that these representations have been received. Should you have any queries or require any further information on the enclosed, please do not hesitate to contact me using the information below.

Yours sincerely,

Rowan Gilbert | Town Planner MRTPI

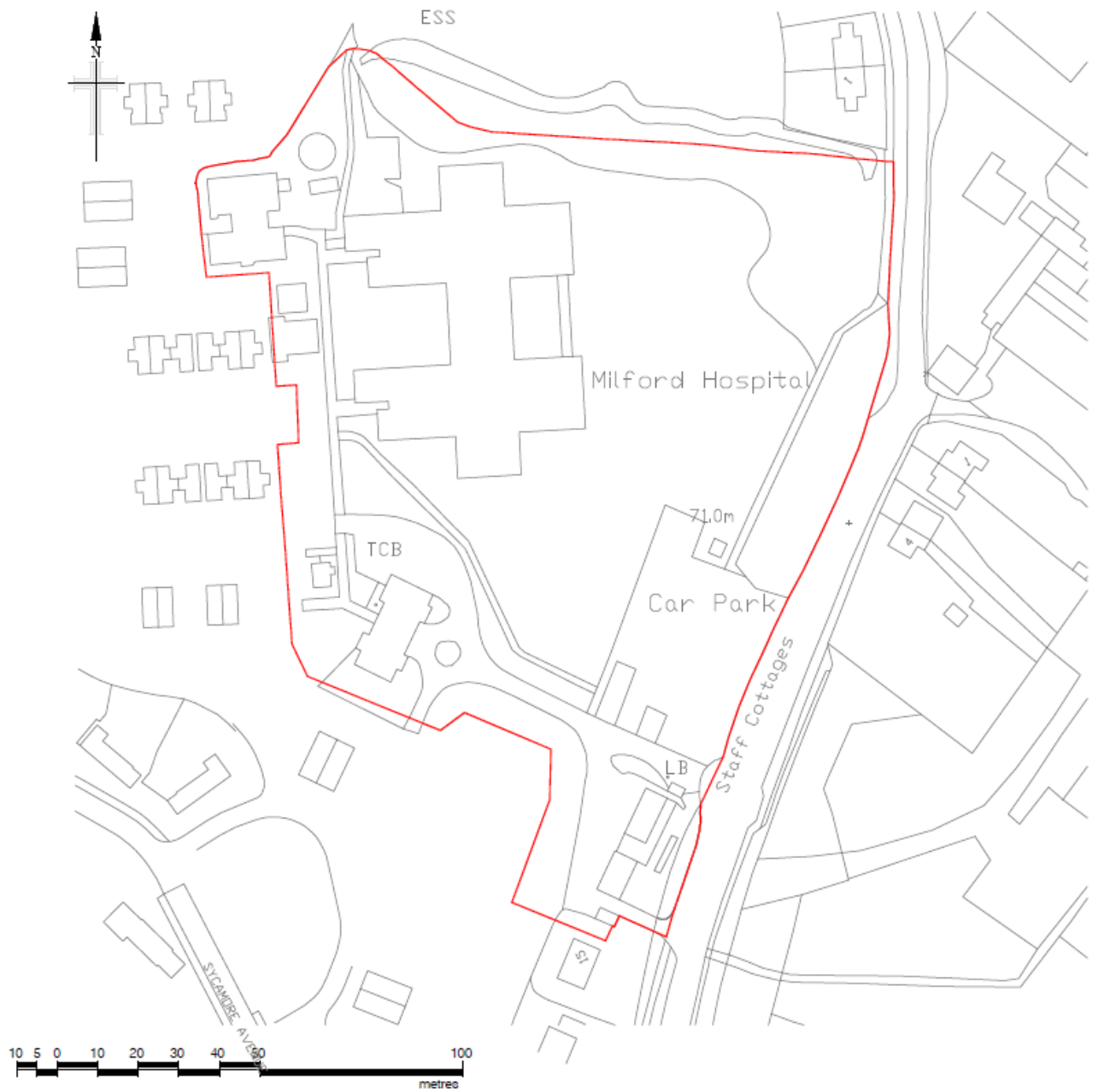
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Appendices:

1. Site Location Plan
2. NHSPS Representations to Regulation 19

Appendix 1 – Site Location Plan



Appendix 2 – NHSPS Representations to Regulation 19

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29th January 2021

Dear Sir/Madam,

BY EMAIL

WAVERLEY PRE-SUBMISSION LOCAL PLAN PART TWO CONSULTATION – MILFORD HOSPITAL

NHS Property Services Ltd (NHSPS) are the landowner of the below site:

- Milford Hospital, Tuesley Lane, GU7 1UF

We wish to make representations, in respect of the above site, to the Waverley Pre-submission Local Plan Part Two. These representations are accompanied by a Site Location Plan.

a. NHS Property Services Site Ownership

NHSPS Property Strategy team has been supporting Clinical Commissioning Groups and Sustainability and Transformation Plan groups to look at ways of better using the local health and public estate.

By way of background, local health commissioners are currently developing a strategy for the future delivery of health services in this area. This will include identifying opportunities to reconfigure the estate to better meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites emerging from this process. This could include opportunities to make more efficient use of the sites, re-providing health services from modern fit for purpose accommodation, alongside the release of 'surplus' parts of the sites for redevelopment (including housing and/or care home uses).

To confirm, a property can only be released for disposal or alternative use by NHSPS once Commissioners have confirmed that it is no longer required for the delivery of NHS services.

NHSPS is therefore promoting the site in accordance with Department of Health guidance (Health Building Note 00-08) which states "NHSPS owned sites that may become surplus to requirements should be protected by securing specific land-use policies for these sites in the relevant DPDs".

Should any part of the subject site be declared as surplus to the operational healthcare requirements of the NHS in the future, then the site should be considered suitable and available for alternative uses including a range of residential accommodation and/or health facilities. The subject site is considered available, suitable and deliverable within the period 6-10 years. A flexible approach is required in relation to this site, in order to enable the NHS to make optimum use of the land.

b. Site Context - Milford Hospital, Tuesley Lane, GU7 1UF

The Milford Hospital site is located within the Metropolitan Green Belt between Milford and Godalming, approximately 1.25km west of Milford Village Centre and 2km south west of Godalming Town Centre. The site measures approximately 0.44ha and currently accommodates a large two-storey building, and additional ancillary buildings. Vehicular access to the site is gained via Tuesley Lane to the east and via Sycamore Avenue to the north. An area of hardstanding car parking is located to the south east of the site.

The site is a previously developed brownfield site within the Green Belt, and has become surrounded a significant amount of built form to the north, west and south in the form of new residential dwelling houses, and large farm buildings to the east.

The site lies within 5km of the Wealden Heaths SPA, but outside both the Surrey Hills Area of Outstanding Natural Beauty and the Area of Great Landscape Value. There are two bus stops located approximately 200m north of the site, offering services towards Godalming and Guildford. Milford Rail Station is located under 1km to the south west of the site via an existing footpath, offering regular services towards London Waterloo, Haslemere and Portsmouth and Southsea.

There is an opportunity to make more effective use of this site. This could come forward in the form of new/improved health facilities, alongside the release of any surplus parts of the site for alternative uses (including housing and/or care home uses). The existing Green Belt designation serves as a significant constraint to the provision of new/improved health accommodation, as well as preventing the NHS from making the best use of a previously developed site surrounded by new residential dwellings.

Should any part of the site be declared as surplus to the operational healthcare requirements of the NHS, it should be considered suitable for alternative uses. This could include a range of residential accommodation.

This site is considered available, suitable and deliverable within the 6-10 year period.

c. National Planning Policy Framework

The National Planning Policy Framework (NPPF) is the preeminent national policy; in law, regard must therefore be had to it. In summary, the following paragraphs of the NPPF are of particular relevance to the Local Plan making process, and should be complied with:

- a. Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. They should be consistent with the principles and policies set out in the NPPF, including the presumption in favour of sustainable development (Paragraph 11).
- b. Proposed housing supply must meet evidential need for housing of all types, including a 5% buffer for five year housing targets (or 20% in cases of persistent under delivery), these targets must be deliverable. The Council must identify a supply for years 6-15 which is specific and developable (Paragraphs 67 and 73).
- c. Local Plans should be aspirational but realistic. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan (Paragraph 16).
- d. Local Plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.
- e. The Inspector's primary task will be to consider the soundness of the submitted plan, this will be assessed against the following soundness criteria:
 - **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Housing White Paper (February 2017) urges local authorities to make more land available for homes in the right places by maximising the contribution from brownfield land, releasing more small and medium sized sites.

d. Overview of the Waverley Pre-Submission Consultation Document

The Local Plan Part 2 (LPP2) builds upon the strategic policies set out in the Local Plan Part 1 (LPP1), adopted in February 2018. LPP2 relies on the objectively assessed housing need that was identified during the preparation of LPP1. LPP2 does not propose to deliver any housing above this requirement. Thus, LPP2 allocates housing to meet the LPP1's annual housing requirement of 590 dwellings per annum, resulting in 11,210 additional homes over the 2013-2032 plan period. However, this requirement does not take into account the minimum estimates of local housing needs set out through the DCLG's 2018 and December 2020 standardised housing methodology, which state that the local housing need for Waverley is significantly higher, at 679 dwellings per annum or 12,901 dwellings over the plan period.

LPP2 states that a significant proportion of the established housing requirement for 11,210 additional homes has either been completed, has planning permission or has already been allocated, and therefore the emerging Plan only allocates land for the residual requirement. The Plan asserts that this residual requirement consists of 320 homes to be allocated in Haslemere, and 203 homes to be allocated in Witley and Milford. Any unmet housing requirements in other parishes are proposed to be allocated through neighbourhood plans.

The Council accept that they do not have enough land to meet the identified objectively assessed need and thus selected releases of Green Belt land will be made through LPP2.

The Council prepared a suite of evidence base documents to inform the emerging Local Plan Parts 1 and 2. Evidence base documents of relevance consist of the following:

- West Surrey SHMA – September 2015
- Waverley Green Belt Review – August 2014
- Landscape Report – August 2014
- Green Belt Settlement Boundary Review Topic Paper – November 2020
- Land Availability Assessment – November 2020
- Green Belt Site Appraisals – August 2020

The Council will utilise these documents to allocate land within the Borough for the development of homes, infrastructure and services.

e. Location of Development

The plan proposes to deliver the housing requirement through the spatial strategy set out in LPP1, prioritising development within the towns and villages in the top three tiers of the Settlement

Hierarchy, this includes the village of Milford. The villages of Chiddingfold, Elstead, Milford and Witley will also be accommodating some growth through the removal of appropriate land from the Green Belt.

The plan allocates three housing sites in Milford and Witley, these sites are anticipated to deliver 204 additional dwellings, against an outstanding requirement of 203. Land has been allocated for removal from the Green Belt due to the limited opportunities to accommodate development on previously developed land within the parish.

Whilst the allocations set out within the emerging LPP2 are anticipated to deliver the residual housing requirement for this location, this requirement does not take into account the standardised housing methodology, which identifies a significantly higher requirement for Waverley Borough. The allocation of further sustainable sites within Witley Parish should be considered, in order to provide for this established housing need of 679 dwellings per annum. The Milford Hospital site represents a sustainable, previously developed site, which could contribute significantly to meeting this need.

f. Site Suitability

As previously identified, the site is currently located within the Green Belt, but due to the existing built form would represent previously developed Green Belt land. Similarly, the surrounding context has changed significantly in recent years, with the introduction of significant new built form to the north, west and south of the site in the form of new residential dwellings. The site is also grouped adjacent to large agricultural buildings to the east across Tuesley Lane.



Milford Hospital Site (bound in red) in context

In preparation for the Local Plan Part 1, the Council undertook a Green Belt Review (2014) which assessed various parcels of Green Belt land within the district. The site, and land to the west and south of the site, was included within parcel C25. This parcel was identified contributing significantly towards the purposes of the Green Belt. This contribution related largely to the aims of checking the sprawl of Godalming and preserving the south of Godalming's historic setting. The site is not included within any additional work regarding the Green Belt (Green Belt Settlement Boundary Review (2020), Landscape Report (2014), or Green Belt Site Appraisals (2020)). We would request that the Milford Hospital site is included as part of an updated Green Belt Boundary Review and Site Appraisals process.

The context of this parcel of land has changed substantially since the 2014 Green Belt Review, and the site no longer contributes to the Green Belt. Most significantly, the site is now surrounded by residential development, granted under application (WA/2012/1592). This development of 104 homes has resulted in a considerable amount of built form, significantly reducing the area's contribution to the Green Belt.

The site is previously developed land, within an established residential area. The site is located within walking distance of both Milford Village Centre and Godalming Town Centre. Additionally, the site benefits from easy walking access to bus and rail services. Given the location and character of the site, and its previously developed status, we do not consider that it contributes to the aims of the Green Belt. This site should therefore be removed from the Green Belt and allocated for new/improved health facilities and/or the provision of alternative uses (including housing and/or care home uses) on any parts of the site declared as surplus to the operational healthcare requirements of the NHS.

The site, as well as a wider area, was previously covered by allocation RD6 in the previous Local Plan (2002), this Plan was superseded by the LPP1 in 2017. Allocation RD6 identified the site as a major developed site in the Green Belt, which was suitable for residential redevelopment.

The site does not contribute to the purposes of the Green Belt and is suitable for redevelopment. Without this change to Green Belt boundaries, this could prevent new/improved health accommodation coming forward, as well as preventing the NHS making optimal use of a previously developed site already surrounded by built development.

g. Summary and Conclusions

These representations identify the site's potential for future development, in accordance with the realignment of the Green Belt. It is evident that the site does not perform against the purposes of the Green Belt set out in the NPPF. We would request that the Milford Hospital site is included as part of an updated Green Belt Boundary Review and Site Appraisals process. We also request the inclusion of a site-specific allocation for the Milford Hospital site which confirms the principle of:

- New/improved health facilities (subject to health commissioning requirements) alongside the provision of alternative uses (including housing and/or care home uses) on any parts of the site declared as surplus to the operational healthcare requirements of the NHS.

There is an opportunity to make more effective use of this site. This could come forward in the form of new/improved health facilities, alongside the release of surplus parts of the site for alternative uses including housing and/or care home uses. The existing Green Belt designation is a significant constraint to both new health accommodation, as well as preventing the NHS from making optimal use of a previously developed site surrounded by new residential dwellings.

The subject site is considered available, suitable and deliverable within the 6-10 year period of the plan.

I trust that these representations provide sufficient information to consider the inclusion of a site-specific allocation for the Milford Hospital site within the forthcoming Local Plan.

I would request to be kept informed of future stages of the Local Plan preparation. If you require any further information, please contact the undersigned (email: [REDACTED] tel: [REDACTED])

Yours sincerely,

Rowan Gilbert

Town Planner.

Enclosed – Site Location Plan