



The Planning Officer
Waverley Borough Council
Western Planning Committee
BY EMAIL

20 December 2020

Dear Sir

34 King's Road, Haslemere – WA/2020/1793 – Object pending further information

The Haslemere Society (THS) wishes to raise a number of concerns regarding this application and to object, pending the provision of additional information, specifically:

- An updated Ecology Report regarding the impact of this specific application to the Medium Conservation Status bat roost identified in the existing building and an updated mitigation strategy if relevant. The mitigation strategy provided was written for a different application and refers to a building that will not exist if this application is successful; and
- A landscape and management plan to support the applicants claim that there will be a biodiversity gain on the site. In particular, this should cover the 8m buffer zone along the River Wey tributary.

Should the Council be minded to grant the application as it stands, these additional documents should be required and assessed by qualified personnel before any works commence. We would also request that the conditions set out in Surrey Wildlife Trust's response to WA/2020/0881 should be attached in full to the permission.

Detailed comments

1. It is not clear how this application relates to WA/2020/0881 for the same site, which is still shown as pending a decision on the WBC website. Has this application been withdrawn? If not, we request that the comments we make below should be considered also as comments on this earlier application.
2. We note that this application is, in places, rather confused. This appears to be because certain documents originally produced for earlier applications on this site (of which there have been many) have been resubmitted with this application without clear explanation of their relevance and without appropriate updating. In respect of the biodiversity and environmental issues at least, the applicant appears to have taken a rather slap-dash approach.

3. All the comments given below are based on our understanding that the development site will be limited to the existing building and a small area of the garden along King's Road so that the lower part of the garden and the area on the other side of the River Wey Tributary will be untouched. We would object, on environmental and biodiversity grounds, to any development that would affect these areas, particularly the river.
4. The Ecology Technical Note identifies a Medium Conservation Status bat roost in the existing building and notes that destruction of the roost would have a significant negative impact at local level. A mitigation plan is proposed which, if followed in full, would lead to a neutral impact. However, this report was clearly produced for a previous application, where the intention was to demolish the existing dwelling and construct a single new building. The developer has not taken the trouble to have this report updated so it is not clear what the position would be under the new plans. Bats are, of course, protected by law and the Council has clear responsibilities in relation to protection of bats and roosts when assessing planning applications. **In this case, we consider that the developer has simply not provided sufficient information in relation to this specific proposal to permit the Council to properly discharge its responsibilities.** An up-to-date and application-specific report should be provided setting out the impact on the roost and a proposed mitigation plan, if relevant.
5. The Biodiversity Checklist refers to the potential for biodiversity gains and refers readers to the Ecology Report (which, as we note above, is out of date and does not refer to this specific application), the landscape proposals and the management scheme. There are no specific documents setting out the landscape proposals or the management scheme. There is a reference in the Design document to the land to the north of the site being "retained" and "partly managed for the benefit of wildlife" but no further information appears to be given anywhere in the documentation. Given the importance of the land along the River Wey tributary and along the railway as a 'wildlife corridor' and for biodiversity (the Surrey Wildlife Trust response to WA/2020/0881 refers) **a detailed landscape and management plan should be provided.** Without these, the assertions regarding biodiversity gain should be wholly disregarded.
6. The Tree Report included in the application is rather old (dated August 2016) but since none of the trees covered in the report are on the proposed development site as we understand it, it is not clear why the report has been included at all.
7. We note, in addition, that the additional information requested by Surrey County Council regarding the road access and parking arrangement has not been made available (as at 20 December).

Yours Sincerely

A handwritten signature in black ink that reads "S. Dullaway". The signature is written in a cursive, flowing style.

Sonja Dullaway
(on behalf of The Haslemere Society Planning Group)