



The Planning Officer
Waverley Borough Council
Western Planning Committee
BY EMAIL

5 February 2024

Dear Sir

70 Wey Hill (WA/2024/00130) - Objection

In principle, the Society supports the building of apartments above the retail space at this site. However, we wish to object to this application on the following grounds:

Scale and appearance

1. The proposal is to partially demolish the upper floor of the existing building and to build up, creating an additional storey so that the final building would be three storeys tall. It is clear from the site photograph contained in the Design and Access Statement (DAS) (at paragraph 1.2) that the roof height of the existing building is in line with the rooves of other buildings on the street, whereas the new building would be significantly higher, having an extra storey. The proposed building would, in our view, be overbearing in size, scale and massing and would dominate the street in a very unattractive way. It would also have an overbearing effect on Wey Springs.
2. The applicant refers to another residential development on Wey Hill, which is three storeys high, and cites this as a precedent for their own proposal. The 'Proposed Elevation' diagram also shows this three-storey building as if it sat directly adjacent to this site. This is misleading. The three-storey residential building is set significantly back from the street, which markedly reduces the impression of height and scale seen from Wey Hill. In contrast, this proposal would front directly onto the pavement of Wey Hill. We therefore do not consider the existing development to be a relevant precedent.
3. It is also clear that the squared-off form of the existing building is already somewhat out of keeping with the properties to either side of it, something which the proposed design would do nothing to improve. This would be a missed opportunity to increase the attractiveness of the street.

Affordable housing

4. There is an apparent contradiction in the application regarding the provision of affordable housing. The Application document clearly states that all of the 20 flats will be market rate, with no affordable housing. However, the DAS, Paragraph 7.4, states that the applicant will be "very happy to provide 4 affordable dwellings when VBC

[Vacant Building Credit] is applied". This is based on the presumption that Waverley agrees the applicants VBC calculation and agrees that this reduces the required on-site affordable housing element from 6 dwellings to 4.

5. We note that we have too often seen developers avoid providing affordable housing in recent years and we would strongly object to any application here that did not meet, in full and on-site, the required number of affordable units. We were therefore unimpressed by the repeated reference in the DAS to the applicant's intention to meet the affordable housing requirement "at this early stage", as if they are expecting to change their position at some later point. We would not consider a financial contribution in lieu of on-site housing to be acceptable, since it is not at all clear how the Council are supposed to turn money into affordable housing in these circumstances.

Parking

6. The proposal contains only 7 parking spaces for a development of 20 flats, where the standard requirement, even within the town centre, would be for 20 spaces. That is a very significant shortfall. Nor could residents easily accommodate their cars elsewhere, since parking is already at a premium on Wey Hill. There is parking along the street but that is intended for visitors to the local shops so that any use of these spaces by residents would be detrimental to the retail units in the area.

Biodiversity and impact on the SPA

7. We note that, in the Biodiversity Checklist, the applicant claims that the development will 'Contribute to the protection, management and enhance diversity' (sic), and 'Make a positive contribution to biodiversity by creating or reinforcing habitat linkages between designated sites, to achieve a connected local and regional ecological network of wildlife corridors and green infrastructure'. The applicant further indicates that they are aware of the upcoming requirements regarding Biodiversity Net Gain (BNG) and refers us to the Biodiversity statement in the DAS for details. Sadly, the DAS merely states that the site has an existing biodiversity value of zero and the applicant proposes to include a grassed central amenity space and would be willing to install bird and bat boxes as deemed reasonable and necessary by the Council. We are at a loss to understand how the applicant can possibly think this is enough to support the claims made in the Biodiversity Checklist.
8. Furthermore, the development site is within 5km of the Wealden Heaths SPA but there is clearly no room for any significant outdoor space to be provided on site for the proposed residents of the 20 flats. We could find no evidence that any provision had been made or indeed any thought given to how the relevant requirements are to be met, despite this point having been clearly raised in the pre-application advice.

Retail space

9. The proposal retains the ground floor retail space but we note the concerns raised in the pre-application letter regarding ancillary space and services e.g. toilet facilities for staff and the need for refuse management for the shops that would not disrupt the busy street outside. This is one of the two main shopping areas in the town and it is vital that this retail space should remain fully functional.

For the reasons given above, we strongly urge the council to refuse this application. As we noted above, we do not object in principle to the creation of dwellings above the retail space on this site. However, we consider this particular application to be not just deeply inappropriate to the site but also to demonstrate a lack of care and thought on the part of the applicant, for example in the weakness of the biodiversity and SANG provisions and in the confusion about affordable housing. We would encourage Waverley not just to reject this application but to do so in a manner which clearly lays out the many failings of this current application, as guidance for any resubmission.

Finally, and we are aware that this is not in itself grounds for rejection of the application, building on this site has the potential to cause even more mayhem on this busy shopping street than the development at the adjacent site has done. Should planning permission be granted, on this or a later application, we would urge the Council to require a detailed traffic and access plan setting out how inconvenience to retail business and residents would be minimised.

Yours Sincerely

S. Dullaway (by email)
(on behalf of The Haslemere Society Planning Group)