



The Planning Officer
Waverley Borough Council
Western Planning Committee
BY EMAIL

19 April 2024

Dear Sir

April Wood (WA/2024/00580) - Objection

The Haslemere Society wishes to object to the above application on the following grounds:

1. **Cramming.** There is currently one property on the site, set in the middle of the plot. The applicant proposes to build another two properties, one either side of the existing dwelling, and to enlarge the existing property. We consider this to be overdevelopment in three ways:
 - a. The application states that the average plot size across the three dwellings envisaged, at 855sq.m, is 'similar to' the nearest such plot on the other corner of Denbigh Road. We submit, however, that the average plot size is not relevant here. The three plots created are very different in size (1,100sq.m., 740sq.m., and 725sq.m.). The relevant question is whether each of these plots individually is consistent in size with the overall character of the area. It seems clear from the site location plan provided by the applicant (Figure 3.1) that they are not, being significantly smaller than nearly all the other plots. This matters because if a single precedent is sufficient to justify further applications, the average size of plot and the general character of the area will inexorably change over time.
 - b. The footprint to plot size ratio also appears out of keeping with neighbouring properties.
 - c. Furthermore, based on the 'street scene' pictures given in the application, the gap between the properties is also out of keeping with the area, giving an impression of crowding from Scotland Lane. That impression will be exacerbated if the hedging is cut back to improve the visibility for vehicles leaving the site as proposed.

While we do not, as a matter of principle, object to subdivision and infilling, in this case we feel strongly that two dwellings would be more suitable to the site than the three proposed.

2. **Parking and turning.** We note the statement in the application that the shared access drive for the existing dwelling and the proposed Plot 1 dwelling will be sufficiently large as to permit a vehicle to enter in forward gear, turn, and then leave in forward gear,

while avoiding the two designated parking spaces. Judging by the plan provided, this is based on there being two (very tidily parked) vehicles at each property. However, Waverley guidelines recommend 2.5 spaces for 3+ bed properties (both houses are proposed to be 4-bed homes), suggesting it is entirely possible that there will need to be parking for three vehicles – and hence insufficient room for a vehicle to turn and leave in forward gear. Nor is it clear what kind of vehicle has been used for this assessment.

3. **Climate Change.** The application is supported by an Energy Strategy and associated SAP calculations. However, the information provided does not meet the requirements set out in WBC's Local Plan Part 2 policy DM2: Energy Efficiency. The methodology used is incorrect as the baseline is not the DER of a dwelling with the specifications of Table D1 but the TER of Be Lean from the SAP worksheets. The proposal should meet this TER from energy efficiency measures alone but is failing by a significant margin. This means that the proposed dwellings are not inherently energy efficient based on the orientation, building fabric, lighting, domestic hot water and ventilation alone. There is a lack of detail as to which energy efficiency measures the dwellings will adhere to, with references only to table D1 and the Notional Dwellings Specifications. The Energy Strategy should be specific to the proposed dwellings as these will influence the floor plans and elevations (for example having the required ceiling voids and risers and wall thicknesses) which will be set at planning stage. It will also form the blueprint which the design will follow up to completion. For example, The Climate Change and Sustainability checklist asks for heat recovery systems to be considered, but there is no mention of these in the Energy Strategy. They would be suitable and beneficial for such a scheme. The Be Green proposals also lack detail; at this stage the applicant should commit to target a certain air source heat pump specification, in particular its efficiency. The proposals are also suitable for the use of photovoltaics and they would provide further carbon reductions so we question why these haven't been put forward by the applicant? The carbon reduction for Be Green should be calculated from the Be Lean TER. The Energy Strategy also does not meet Policy DM2. Contrary to what is stated in the report, the DFEE and DPER do not meet the TFEE and TPER by quite a significant margin. As such the Be Green proposals also fail to meet the Minimum Energy Performance Requirements set out in Part L 2021. Effectively the dwellings as proposed do not meet current building regulation targets.
4. **Overheating** The proposals do not address how they will mitigate the risk of overheating through glazing specifications, window opening specifications, dwelling orientation and shading. This information is required as per the Climate Change and Sustainability Checklist.
5. **Water conservation** Contrary to what is required in the Climate Change and Sustainability Checklist, the proposals have not incorporated any greywater recycling, and it is unclear how rainwater harvesting is being implemented.
6. **Trees.** The tree report provided states that the proposal does not raise any issues regarding the trees on the site. In addition, the application states that additional trees will be planted to infill gaps along the Scotland Lane frontage to replace trees previously "lost" and to reinforce the country lane character. We should just like to note here that one of the trees "lost" along the frontage was a substantial mature oak, which was felled very shortly after the property was last sold in autumn 2022. Local residents had

informed WBC of the potential threat to the tree but the Tree Officer at the time declined to act on the basis that there was not a clear threat. Of course, by the time the threat was clear it was too late. It is somewhat galling now to have the application presented as somehow virtuously preserving the trees when all the ones which might have been a problem have already been felled.

Yours Sincerely

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