



The Planning Officer
Waverley Borough Council
Western Planning Committee
BY EMAIL

3 January 2022

Dear Sir

Land west of Hedgehog Lane (WA/2021/02956) - objection

The Haslemere Society wishes to object to application WA/2021/02956 on the grounds set out below. Since the application is a reprise of WA/2020/1048, some of the original grounds of objection are unchanged and are set out again. However, the approval of the Neighbourhood Plan has also given rise to new grounds for objection.

Our key grounds of objection are:

1. **The application does not comply with various policies in the Neighbourhood Plan.** The Neighbourhood Plan referendum was held on 7 October and the Plan passed with over 87% of votes in favour. It should be considered therefore not just as a statutory part of the planning process but as a recent statement of the wishes of the local community. The application states that Plan Policy H5 (which refers to building mix) is the most relevant and does not address any of the other policies in the Plan at all. In fact a number of Plan policies are relevant to the application, including but not limited to, the following:
 - a. **Policy H1 regarding the settlement boundary.** The site lies outside the settlement boundary. It is also not an allocated site in the draft LPP2 (currently under examination).
 - b. **Policy H9 regarding trees and hedgerows.** We note here that there are additional requirements in respect of developments of more than 10 dwellings (Policy H9.7).
 - c. **Policy H10 regarding Dark Skies,** where the proposed site is classified as E1, the darkest level.
 - d. **Policy H11 regarding Green Fingers.** The proposed development is within designated Green Finger Site 24. Green Fingers are key to the character of the town and also to the support of local biodiversity. They provide green screens between residential developments and link the town to the countryside. Given the already-approved developments at Sturt Farm and Longdene House, the designated Green Finger site 24 is more, not less, important as a screen and a link and to maintain the character of the town. The loss of this benefit cannot be

made good by the provision of green space elsewhere and would make any urbanisation of this site more damaging than would otherwise be the case.

- e. **Policy H12 regarding wildlife corridors.** There is an identified and significant corridor running along the south-west boundary of the site.

We note that the application makes no reference to these policies at all. While some of these matters could be dealt with at a later stage, if the development were approved, the fact that the site is within designated Green Finger 24 is profoundly relevant to the overall application.

- 2. **Damage to the AONB/AGLV site and mature trees on it.** The land covered by the application is that described as 'Area A' in the 2016 application WA/2016/1226. That application was rejected, as was the subsequent appeal. That decision is currently subject to a legal challenge relating to the interpretation of AONB policies. However, unless and until the Inspector's interpretation is overturned in court, the basis of the appeal decision stands. The current application gives no explanation as to how the concerns raised in this decision have been overcome. The site is still a mix of AONB and AGLV (and the AGLV land is within the current AONB boundary review so may be reclassified as AONB) and the protections afforded such land remain. The Inspector's concerns over the avenue of trees and the trees around the boundary of the site remain valid even with the reduced number of dwellings proposed. In particular, the line of trees along the southern boundary of the site would throw considerable shade over at least two of the five proposed self-build sites (and possibly all the dwellings, given the slope of the land), making future pressure to fell or reduce these trees more likely.

This application most definitely does NOT conserve or enhance this AONB-designated land and does NOT comply with National, Local or Surrey Hills AONB Management Plan policies; NPPF Para 172 and Surrey Hills AONB Management Plan Policies P1, P2 and P3 refer.

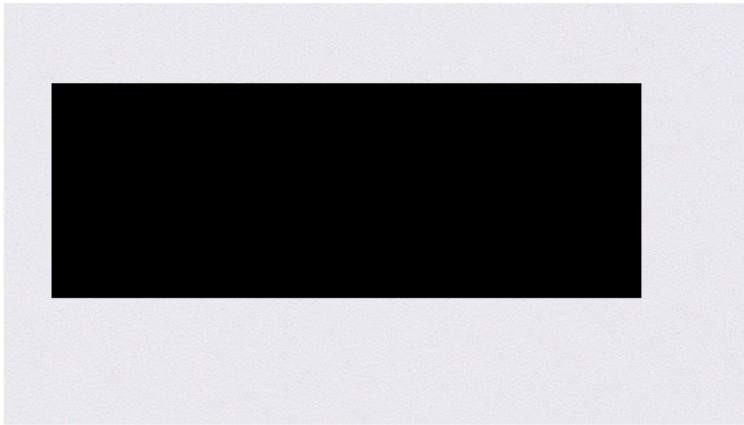
- 3. **Consultation with local residents.** The applicant suggests that consultation with local residents has been adequately covered by the consultation regarding the draft LPP2 together with 'engagement' with the Community Land Trust and consultation with local essential workers. We strongly disagree. The Community Land Trust and the local essential workers might be expected to be supportive. While their views are obviously relevant, they cannot be considered a reasonable proxy for the local residents. Nor can the consultation on the draft LPP2 be considered a reasonable substitute for direct consultation about a specific development that will affect them.
- 4. **Balancing affordable housing and protection of the land.** The applicant makes an emotive call for affordable housing for key workers. THS strongly supports the provision of affordable housing across all significant developments and we have been regularly disappointed to see developers withdraw their offer of such provision late in the planning process. However, this is not the right site for *any* development and the provision of affordable housing does not overcome that. The protections afforded this land in the AONB, AGLV and Green Finger designations are not arbitrary pieces of bureaucratic red tape but a reflection of the real and lasting value of the land both to

local residents and the wider community. Once built upon, the natural beauty of this area would be lost forever, to this and all future generations.

5. **Housing and land supply.** Finally, the application puts a lot of weight on the claim that WBC is not meeting the required 5YHLS. In November, WBC published a statement that it does meet the requirement and explaining how. We presume therefore that the application will be assessed on that basis.

For the reasons given above we strongly urge the Council to reject this application.

Yours Sincerely



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