



c/o 45 Petworth Road  
Haslemere  
Surrey  
GU27 2HZ

26 February 2020

Planning Department  
Waverley Borough Council  
The Burys  
Godalming  
BY EMAIL

Dear Sir,

WA/2020/0029 – The Heights

The Haslemere Society (THS) does not object in principle to the residential development of this site. Indeed, a development of suitable form and density would be acceptable. However, we consider this application to be materially flawed and wish to strongly object to it, on the grounds set out below.

- 1. Loss of a non-designated heritage asset.** The applicant proposes to demolish the school buildings, including the house (subsequently converted to school use), which, there is now conclusive evidence to show, was designed and built by the renowned local architect, Herbert Hutchinson. The Hutchinson building makes a significant contribution to the overall character of the area as one of a number of such properties. This character cannot be maintained by keeping only those examples of Hutchinson's work which could be argued to be of particularly strong architectural merit on a standalone basis. We note that, in this application, there is no reference to the loss of this heritage asset. The applicant has made no attempt at all to engage with this element of the previous refusal. Note that THS does not object to the demolition of the other parts of the school building.
- 2. The nature and scale of the proposed buildings.** The key difference in this application to previous ones is that the number of buildings in the 'front row' has been reduced to a single building containing two semi-detached houses, and these are set further back from the road. While THS welcomes this change, it is insufficient to deal with the previous objections. Since the number of dwellings has hardly changed (22 now, against 25 before), moving the front row back makes the back of the site even more crammed than it was before. The proposed development would more than double the number of dwellings at that end of Hill Road and the style of dwelling is quite different from the existing ones. Since the site is steeply sloped, the three-story properties proposed for the 'middle row' would appear overbearing from the road. Finally, the proposed development does not meet the Haslemere Hillside policy requirement set out in old Local Plan BE4 and in the (yet to be published) LPP2 as it would be easily visible from the High Street.



3. **Surface water drainage.** This is a key issue and needs to be resolved before planning permission can be given. Given its technical nature, we strongly suggest that detailed plans should be assessed by an independent specialist before Councillors consider the application.

The existing piped site drainage system is inadequate as rainwater currently flows off the site road into Hill Road, where the existing drainage is also very inadequate, causing flooding and much concern to local residents. The proposed drainage scheme is consequently a very important consideration which we comment upon as follows:

- a. The SCC Flood Risk Authority has stated that it is “satisfied that the proposed drainage system meets the requirements of NPPF, its accompanying PPG and non-statutory technical standards for sustainable drainage systems”. Whilst they stipulate several conditions/requirements that need to be met we would question their conclusion, especially “that there will be no discharge from the site” and feel it necessary to point out the following practical deficiencies of the drainage proposals.
  - b. A comprehensive soils investigation has not been carried out and consequently it is unknown whether the concentration of rainwater into no less than 26 soakaways amongst the tightly spaced buildings will have an adverse effect on the stability of this sloping site and the foundations to the buildings and any retaining wall structures, details of which are not given in the submission. Only limited soakage tests have been carried out which do not confirm the feasibility of soakaways across the whole site.
  - c. Run off from the ‘permeable’ roads and parking areas will exacerbate this situation and the effectiveness of ‘permeable paving’ on sloping surfaces is considerably reduced, increasing the risk of water flowing down the roads on to Hill Road. Siltation of the proposed block paving will make it impermeable. The proposal for 3-, 6-, 12- and 24-month maintenance procedures and uplifting of the permeable block paving and its sub-base to deal with siltation is too onerous and costly a commitment for the new property owners and in all probability will not be carried out with the obvious result of water flooding down on to Hill Road. It is likely that other residents of Hill Road would have to take legal action if they wished to force Heights residents to meet the maintenance schedule.
  - d. The method of dealing with rainwater discharge from this site, we feel, needs further careful consideration, possibly employing an attenuated piped system for at least a proportion of the rainwater collection. As acknowledged in the drainage calculations we now experience far more intense rainfalls with increased flooding potential.
4. **Missing information.** We would also like to raise the matter of the way the application has been presented. Despite the significant number of plans and other documents submitted and available on the WBC website, it is effectively impossible to get a clear understanding of certain aspects of the proposal. For example:



- No cross-section drawing of the whole site was provided, either top to bottom or across the front of the site. So, while elevations of individual buildings are given, there is nothing to show what the site might look like from the road;
- Given the steepness of the site, retaining walls are likely to be necessary. These are not shown on the plans and no information is given as to construction or facing materials;
- No information is provided in the plans regarding landscaping of the site. The implication from the plans is that all the land between plot 6/7 and Hill Road will be landscaped garden belonging to those properties, but this is not stated. Should the application be granted, we would request that it be stipulated that there should be no additional development along the frontage of Hill Road on this site and that the grounds will be appropriately landscaped.
- The Haslemere Design Statement's requirements for the treatment of front gardens are a material planning consideration but have not been addressed at all in this application.

In conclusion, this application is substantially the same as the previous applications made for this site, which were rejected on the advice of the Planning Officer. We understand that these applications are now subject to appeal. However, almost no attempt has been made in the latest application to meet the key reasons for objecting to the previous applications given by the Council. We can therefore see no reason why this application should be accepted where the previous ones failed, and we urge the Council to reject this application.

Yours sincerely

Sonja Dullaway

On behalf of The Haslemere Society Planning Group