



The Planning Officer  
dcplanning@chichester.gov.uk  
BY EMAIL

25 February 2024

Dear Sir

Land North of 1-16 Sturt Avenue, Camelsdale, Linchmere (LM/23/02758/FUL) - Objection

The Haslemere Society wishes to object to the above application on two key grounds; first, the likely unmitigated damage to the local ecology; and, second, various water matters. The details are set out below.

**Biodiversity matters**

1. The woodland and watercourse habitats within the site are considered by the applicant's own ecology report to meet the criteria of priority habitats within Section 41 of the NERC Act, 2006 and a significant part of this will be lost if the site is developed, since it will be impossible to build anything on the site without removing much of the current woodland, fallen trees etc.
2. The streams that run along the eastern boundary of the site form part of the Haslemere Ecological Network of wildlife corridors, identified as part of the Haslemere Neighbourhood Plan. While we recognise that this document does not carry the same formal weight for Chichester as it does for Waverley, this is nonetheless relevant to assessment of the current level of biodiversity on the site and to the likelihood of detriment from the proposed development. We note in particular that the Ecology Report submitted with the application suggests the 'likely absence of water voles and otter within the watercourse' but in fact the Haslemere Biodiversity Group observed otter evidence in Hammer in 2022 so they may disperse across and utilise this site, at least annually.
3. This wildlife corridor would need to be culverted if the new access is built, which would be detrimental to the corridor as a biodiversity resource. We understand that the access bridge was granted permission on appeal, but we consider that the impact of it is relevant to consideration of the main application since the access is unlikely to be built unless the development is permitted.
4. The application claims that 220m of new hedgerow will be planted on the site. The map at Fig 1.1 does not show where this will be but presumably it will be part of the private gardens belonging to the properties, since there is no other room on the site. In this case, it will have no protection at all from any changes that the homeowners might wish to make and is likely to be kept relatively low and pruned as part of general garden maintenance, thus significantly reducing its value for biodiversity. Furthermore, the

applicant does not propose to use any kind of irrigation system. Mature trees and hedgerows should not generally need such a system, but new plants will. Instead, the applicant is proposing to leave it up to the homeowners to ensure, by 'manual watering', that the landscaping will survive its first few years. We consider this to be wholly inadequate.

5. Overall, the applicant's ecology report lists a number of material adverse effects to biodiversity should the scheme be granted permission and acknowledges that off-site habitat creation will be necessary to achieve the required BNG. However, no specific information about this is provided, not even an indication of what site is proposed. We do not consider this to be a matter that can adequately be dealt with through a condition, since that approach denies the public an opportunity to review the proposal, to take expert advice if they wish and to comment. This is an important principle, which applies to all significant issues on all applications. If public consultation is to be meaningful, the applicant must provide sufficient information on all material issues for the public to be able to form a view.

### **Water matters**

6. We note that Thames Water have objected to this application on the grounds of concerns about access to the Haslemere Water Treatment Works and the impact of the works on the amenity of residents of the site should the development go ahead.
7. Thames Water also raise concerns about the potential impact on the local aquifer of the development works, which we share. Unlike Thames Water however, we do not consider the suggestion that a condition be added to the permission to ensure there is no detriment to the water source is enough. There is no good reason why the applicant should not have considered this matter and set out a strategy as part of their application. As with the biodiversity matters above, we do not consider it to be appropriate here to deny the public an opportunity to comment on the specific proposals for dealing with a matter of real significance to the local community.
8. Regarding flooding, we note and support the comments made by the River Wey Trust in their letter of objection.
9. Finally, we would note that Thames Water has been unable to maintain an adequate water supply in Haslemere in recent summers with the existing housing stock. The developments at Sturt Farm and Scotland Lane are not yet inhabited so demand is set to rise significantly from the current level even without this additional development. Since there is no trunk water supply for Haslemere, Thames Water's only recourse in dry periods is to run tankers of water up to the Blackdown Reservoir and to provide bottled water when the tankers can't keep up. No strategic solution has even been proposed at this point, never mind implemented. Thames Water have not objected on these grounds but nor have they set out any explanation of how an adequate supply to all residents will be maintained even with current housing levels.

Yours Sincerely

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