



The Haslemere Society Neighbourhood Plan Response

The Haslemere Society (THS) strongly welcomes the Draft Neighbourhood Plan (NP) draft and registers its appreciation and thanks to all the many volunteers that have provided their time and expertise to get it this far. Our experience of almost two decades of assessing and commenting on local planning applications has been used in preparing this review and we look forward to the NP becoming an important instrument in assisting the planning process for the benefit of the wider Haslemere area covered by the Plan.

Key points

1. **The compromises inherent in the plan should be drawn out more clearly.** THS supports the four objectives set out in the preamble of this document. However, it is inevitable that these are sometimes in conflict, particularly given the need to meet the requirement for additional dwellings set out in the LPP1. There must inevitably be compromises, which will mean accepting developments that residents of the Plan area do not like. It is essential therefore, that the Plan should not only set out what local people would like to see but also some form of prioritisation of the objectives / policies, preferably area by area, so that it is clear which parts of the Plan take precedence in any conflict. E.g. if delivering affordable housing is the priority then implementing the national space standards might be negotiable to achieve this. If rejecting building on AONB land is the priority, then requiring higher densities within the settlement boundary might be more strongly enforced. Without this prioritisation, there is a **high** risk that **none** of the objectives will be met.
2. **Preserving the character and amenity of the town and area.** THS would also want to add a specific objective around preserving the character and amenity of the town and wider area (at present there is only a passing reference to development that 'respects the character of the area' within the first objective). This should also be more clearly defined than it is at present and should include not just those elements referred to in the Principles section of the Plan but also the generally wooded nature of the area and the way that this cloaks the settlements making them appear less dense than they actually are. The objective should also refer to maintaining and enhancing the amenity of the town, which should include the commercial and retail aspects as well as amenities like dentists, healthcare provision of various sorts, access to playgrounds and green spaces, pollution levels etc. These are also a key part of what makes Haslemere and the surrounding areas such attractive places to live and work.



3. **Proposed higher densities.** One key compromise that should be brought out and examined more carefully is the proposal for higher densities within the settlement boundaries in order to avoid building outside them. The Plan (Policy H1.5) suggests that all new developments of more than 10 dwellings within 1km of the station should achieve a minimum of 75dph and outside this area should achieve a minimum density of 45dph. No information is given as to existing densities within these areas and THS suggests that it is difficult to assess what these proposed densities will mean in practice when they are presented in this abstract way. However, THS has assessed what these densities would mean if applied to the sites suggested in LPP1 and considers that, in a number of cases, these densities would seriously damage the character of the area (see table below for the most obvious examples). We note also that, at the densities proposed, the four sites listed below would provide over 500 dwellings, more than required across the whole NP area. It is therefore not clear why such a high density has been suggested.

Site number	Site	Area (ha)	Dwellings proposed in LPP1	Density as proposed in LPP1 (dph)	In 75dph area or 45dph area of NP?	Dwellings at NP suggested density.
DS10	East of Longdene House	2.0	30	15	75	150
DS15	Longdene Field	0.8	25	31.25	75	60
DS17	The Heights	1	20	20	45	45
DS18	Red Court, Scotland Lane	5.5	50	9.09	45	247

Please note that THS is **not** suggesting that higher densities are never viable or appropriate and we recognise that higher densities will be required within the settlement in order to avoid building outside it, but greater clarity on where higher densities are suggested is needed. It is our view that a blanket recommendation based on the rather arbitrary measure of distance from the station is wholly inappropriate and will inevitably undermine the character and amenity of the town and other parts of the Neighbourhood Plan area. We comment further on this matter in our response to Policy H1.5 below.

4. **Parking.** THS considers this a critical matter, which needs to be addressed in more detail than is currently achieved by the Plan. Parking is already very difficult at times in Haslemere town centre, Wey Hill and Beacon Hill and also in other parts of the Plan area, to the detriment of both the commercial and retail businesses operating here and ordinary Plan area residents. Although parking is picked up in a number of the policies set out in the Plan, THS would like to see an overall parking plan that reflects the different needs of commuters, residents, shoppers and visitors. The



current parking provisions in the town are at times already inadequate and with the planned population increase in Haslemere and beyond, more parking facilities will be required during the plan period. In this country town serving a rural hinterland without adequate bus services, a policy that tries to reduce overall car use will fail. The NP must address this requirement if only to indicate the increased parking facilities the town requires. THS would support increased commuter parking by either a further deck on the station car park or, if necessary, an extra deck on the WBC-owned Weydown Road car park together with further parking provision for residents and shoppers in Wey Hill and the town centre. Restrictions may need to be introduced to maintain these parking areas for different groups. The so called 'Key Site' adjacent Waitrose should provide an opportunity to increase parking (not a reduction) and the NP should recommend that the existing practice of allowing residential development near the town centre to utilise public parking facilities should stop. Arrangements for any changes of use of space above retail premises will need to address the parking issue and new developments will need to provide on-site parking.

5. **Connecting the High Street and Wey Hill.** The NP refers to the objective of better connection between the two parts of Haslemere town – the High Street area and Wey Hill. A significant contribution to the current separation of these two parts is the railway and, in particular, the narrow and low bridge at the end of Lower Street. The NP does not address this. Given the considerable development planned to the west of the bridge and the many hundreds of commuters who have currently to negotiate the narrow, dangerous and unhealthy footpath each day an alternative pedestrian access below the railway is a priority which must be addressed, again as a local matter.
6. **The standing of the Plan, once agreed.** The Plan must include some statement about the relative standing of the Neighbourhood Plan (once agreed) and other planning policies and the weight that will be given to the Plan by WBC planners. Is the Plan a 'material consideration' or is it stronger than that? Will this status apply to the whole document or only the text of the detailed policies? Given that the LPP2 may not be completed until after the Plan referendum is held, what is the process for dealing with any inconsistencies between the two and subsequent disclosure to the public to conform to the desired transparency standards?
7. **Format of planning applications.** If this is within the remit of a Neighbourhood Plan, we would also like to add a requirement that all planning applications should follow a common format and be presented in a way that makes them easy for lay persons (e.g. normal residents) to assess. At a minimum, planning applications should include an index document showing what material has been provided and what it covers. As it stands, reviewing even small proposals can be very time-consuming and difficult for residents. While some of this is inevitable, it is reasonable to expect both applicants and WBC to take all reasonable steps to facilitate this kind of local scrutiny. As part of achieving maximum transparency, any



discussions between the applicant and WBC or HTC or their officers should be minuted and these minutes should also be included in the material provided on the WBC website. All material provided by the applicant in support of their application should be provided in full and without redaction on the public website.

8. **Which developments shall be supported.** There are various places where the NP specifies that particular developments “*shall be supported*” e.g. H1.4. Some of these include the proviso that the development must comply with the other NP policies, but others do not. It therefore makes sense to have a statement at the front that developments that comply with all relevant NP policies and conformity with the principles of the Haslemere Design Statement (signpost to H4 below) shall be supported. At a minimum, the proviso should be inserted into all of these statements – otherwise it may be inferred that, where this wording is absent, the intention is that compliance with that one policy alone will be enough to warrant support.
9. **Planning for essential services.** THS considers that a number of essential infrastructure services in the NP area – including water, sewage, gas, schools, medical facilities, roads and flood management – are already under considerable strain. Adding a further nearly 1,000 dwellings, and potentially some 3,000 people, to the area can only exacerbate the existing problems unless proper planning is undertaken. THS is aware of a series of incidents in recent years where emergency repairs or works have been needed and even as we write half the town is suffering low water pressure (and, in some cases, loss of water altogether) because of low water levels in the Blackdown Reservoir – and that after one of the wettest springs on record. This highlights the potential inadequacy of the existing water supply. While planning applications are forwarded to the statutory providers of these services, the consideration given in response is piecemeal. THS recognises that provision of these essential services lies with the statutory providers, not with WBC or HTC, and that some necessary upgrading of services has been carried out. Nonetheless, THS considers that as part of the NP, the local authorities should seek to obtain an honest appraisal of the current infrastructure capacity and condition and a report on plans for future provision to meet the expected rising demand through the Plan period from the relevant providing bodies.

In order to help HTC and Haslemere Vision to produce future drafts of the Plan please find below a more detailed commentary. We would be happy to discuss further to bring clarity should this be required.



Section 2 – Detailed policies

Policy	Comments
H1	<p>Designation and purpose of the settlement boundaries</p> <ul style="list-style-type: none"> • H1.1 – settlement boundaries. THS supports the settlement boundaries as shown. • H1.2 – green space. THS would prefer this to be strengthened e.g. “..there will be a strong presumption against the development of land that lies outside the settlement boundaries” but would accept permission for single-dwelling infill on existing build land outside the settlement boundary. • H1.3 – AONB/AGLV land within the settlement boundary. It is not entirely clear whether this policy is intended to apply to AONB/AGLV land within the settlement boundary or outside the settlement boundary or both. As proposed, we understand that there is no AGLV or AONB land within the boundary, but this may change if the settlement boundary is changed, e.g. in LPP2. In any case, THS considers that the presumption against building on AONB or AGLV land whether inside or outside the settlement boundary should be much stronger and the threshold for doing so higher. The threshold suggested is too weak. • H1.3 – ‘planned development’. It is also not clear here whether ‘planned development’ means approved, built or something else. This must be clarified. Nor is it clear exactly how the table should be applied – does it mean, for example, that so long as planning permission for 630 dwellings has been granted by the end of 2023, no application for development of AONB/AGLV land should be considered? Are there intermediate thresholds e.g. at end-2020? Finally, the table does not describe a smooth path from 0 to 990 dwellings. This would require 52 dwellings to be granted permission each year, giving thresholds of 262 dwellings in 2018, 522 in 2023 and 782 in 2028. What is the rationale for the more stretching thresholds listed? THS would support the smooth path as granting more time for the requirements to be met in a way that suits the residents. • H1.5 – as noted in Key Points, above, THS considers that a blanket requirement for these high densities within the settlement boundaries is inconsistent with preserving the character and amenity of the town. The table below sets out the full impact of the application of these densities to the sites listed in LPP1 (though we note that as it stands, Policy H1.5 would not apply to DS19, DS21 or DS22). In addition, THS would make the following points: <ul style="list-style-type: none"> ○ The designation of the area within 1km of the station appears arbitrary and no explanation is given as to why this is chosen instead of, for example, a patchwork of specifically selected areas. A wider range of densities might also be selected. While the station is clearly important to the town and surrounding area, it is not necessarily the case that residents seeking



the smaller properties delivered by higher densities will be rail commuters. If they are not, then making this area higher density will simply add to the already problematic traffic congestion at peak times.

- HS notes that the 2002 WBC Local Plan Policy BE6 defines the area occupied by properties on Weydown Road, Derby Road and bordering onto Church Lane as a Low Density Residential Area and “seeks to retain the character of low density residential areas in older, well-established areas...”. This area falls entirely within the higher density 1km radius proposed in the Plan, a clear contradiction to the existing designation.
- As demonstrated by repeated questions about this during the webinars, the current proposed boundary between the 75dph and the 45dph areas is not sufficiently clear based on the text of H1.5. A map should be provided to make it absolutely clear which areas are in and which are out (whether this is based on the current 1km radius or, as we would strongly prefer, a more bespoke approach). There may also need to be a statement about how to deal with sites that fall across the boundary as well as roads or areas that are divided by it. For example, as it stands, the proposed 1km circle would include only part of the High Lane, Sun Rise and Stoalety Rise estates.
- During one of the webinars, HV suggested that there would be discretion in applying the minimum densities since some sites may simply not be suitable for example because of the topography. However, as it stands the text does not provide any flexibility at all. If the intent is to allow a more flexible approach, the parameters for this must be stated.
- If the higher density areas were selected in a more bespoke way, THS would support the density requirement being applied at a lower threshold than is suggested in H1.5 and suggests instead a threshold of 4 dwellings. Alternatively, it might be better to apply the threshold to sites on the basis of the size of the site, rather than the number of dwellings.
- THS notes that developments of flats, rather than houses, are much more likely to deliver the higher densities suggested without damaging the character of the area since the smaller footprint would allow more garden space. This is also consistent with delivering the smaller dwellings that the area needs, particularly in affordable housing. If the higher density areas were selected in a more bespoke way, THS would welcome stronger requirements to meet these densities.
- In order to meet the need for off-road parking for these higher densities, it is likely that ground floor or underground parking would be required. A policy statement supporting this may be helpful.
- More generally, it would be helpful to set out general requirements relating to developments of flats e.g. how many storeys are likely to be acceptable.



Site number	Site	Area (ha)	Dwellings proposed	Density as proposed (dph)	In 75dph area or 45dph area?	Dwellings at NP suggested density.
DS07	West Street	2.1	30	14.29	75	157
DS08	Hindhead	1.64	39	23.78	45	73
DS09	5-21 Wey Hill	0.3	45	150	75	22
DS10	East of Longdene House	2.0	30	15	75	150
DS11	South of Haslemere Water Treatment works, Sturt Road	0.8	20	25	45	36
DS12	Wey Hill Youth Campus	1	31	31	75	75
DS13	North of Haslemere Saw Mills, Sturt Road	0.8	21	26.25	45	36
DS14	38 & 40 Petworth Road	0.8	15	18.75	45	36
DS15	Longdene Field	0.8	25	31.25	75	60
DS16	Georgian House Hotel	0.25	19	76	75	18
DS17	The Heights	1	20	20	45	45
DS18	Red Court, Scotland Lane	5.5	50	9.09	45	247
DS19	Rear of 4 Wey Hill	0.15	5	33.33	75	11
DS20	Fairground Car Park	0.5	50	100	75	37
DS21	Land by Royal Oak	0.2	6	30	45	9
DS22	12 Kings Road	0.05	5	100	75	3



H2	<p>Development outside the settlement boundaries on existing built land</p> <ul style="list-style-type: none"> • This appears to mean no infill building (i.e. building a new property in the garden of an existing property) outside the settlement boundaries. Is this the intention? • ‘minimises its visual impact on the neighbouring countryside’ is rather vague.
H3	<p>Sustainable development outside the settlement boundaries and inside on designated land</p> <ul style="list-style-type: none"> • Should the policy not read “land designated as within AONB or AGLV” (rather than “AONB and AGLV”)? • H3 – AONB/AGLV land. As noted in H1, THS considers that there should be a prohibition on any new development on this type of land, whether inside or outside the settlement boundary. • H3 – general. Policy H3 conflates two sorts of requirements and might be better split out. Some of the requirements e.g. sustainable construction methods and high standards of insulation as well as much of H3i, relate to the quality of the building itself. THS strongly supports the suggestion that there should be additional requirements for building on AGLV or AONB land (in the unlikely event that it is permitted at all) relating to the impact on the landscape/biodiversity etc but it might be more helpful to set these out separately. • H3i - Whilst the objectives of this HQM Grade 4 requirements of this voluntary (not statutory) scheme are appreciated, THS would query the legal ability or suitability of an NP to impose this requirement. The construction aspects should be mirrored in the Waverley LP and, for example, the insulation and energy-saving requirements are dealt with fully under the statutory Building Regulations. The Breem/HQM is an involved process, relatively expensive assessment and certification designed for large commercial and large housing projects and it is questionable whether it is suitable for existing house alterations, extensions and single relatively modest projects which will probably be the more common project. This policy is specified for • ALL developments. It is a relatively new non-statutory scheme and looking at the list of independent assessors in • 'greenbooklive' THS could not find a local assessor dealing with domestic dwellings. Breem/HQM cross references to the (statutory) Building Regulations which deal with the important construction aspects. Consideration should therefore be given as to whether this is a suitable policy requirement. Limiting/using it for the environmental, biodiversity and ecology aspects might be considered. • H3ii – the wording here is very weak. Developments are required only to <i>"include features designed to contribute.."</i>, which <i>"may include"</i> the listed approaches. While THS recognises that different sites will require different kinds of protection,



	<p>making it unhelpful to have a single list of requirements, there needs to be some form of absolute requirement against which developments can be assessed otherwise this policy could still be met by a development that e.g. caused significant damage to the ecology of the site. Why not require developments to maintain or enhance biodiversity as stated in H14?</p> <ul style="list-style-type: none"> • H3iif – provisions for the enhancement of an acceptable parcel of land. Some information around what would make a site ‘acceptable’ would be helpful here. • H3 - community-led, genuinely affordable housing developments. Why are these not required to meet the H3 standards? Again, it would be clearer what is intended here if the requirements that apply to the building itself were separated from the requirements relating to the environment in which the building is sited.
H4	<p>Consultation requirements</p> <ul style="list-style-type: none"> • THS supports any measures which aims to assist local residents in making constructive contributions to the planning process in the future. In this spirit, THS suggests that developers should be required to present their application in the most accessible way possible so that members of the general public can reasonably review and comment on it – see the point 6 in Key Points, above. • H4 – any development application for 50 or more dwellings.. Specifying developments of 50 or more housing units is an invitation to developers to propose developments of 48 or 49 units. A development of 20 houses is a large development for Haslemere with its physical constraints, and we suggest this is a more appropriate number for control purposes? • H4 – general. There should be no differences between the information required to satisfy the NP and that required for the WBC Planning Application. The potential for duplication, increased and unnecessary work and cost for the applicant should be avoided. • H4 – general. A regular concern THS has had over a long time is the practice of WBC Planning Department to grant planning approval subject to subsequent agreement on external materials, details and landscaping. This enables a developer to make a brief/inadequate statement to obtain a planning approval and to incorporate the cheapest materials and details, sell on and leave maintenance/repair to subsequent owners. It is far easier for WBC to ensure high quality of design and materials before an approval is granted and significantly more difficult afterwards which is counter to the objective of achieving “<i>high quality construction</i>”. Other Local Authorities require comprehensive specification/agreement on such matters BEFORE granting an



	<p>approval. The NP should seize the opportunity to overcome this weakness in the WBC system by agreeing an appropriate clarification and upgrading of this point in the requirements for planning applications in the new LPP2.</p> <ul style="list-style-type: none"> • H4 – development brief viii. Regarding design style, the Haslemere Design Statement is relevant and should be referred to in all relevant sections of the NP. • H4 – general. The consultation documents should be required in full even with an outline planning application. • H4 general. What timeframe is intended for the consultation? • H4 general. The intent section refers to a presentation, but this is not set out in the policy itself. • H4 – general. For sites of this size, the application should also state how the construction would be managed. • H4 – general. Why is it “<i>Developers may consider explaining</i>”? The 12 Building for Life Standards are intended to be the basis for discussion between the developer and the local authority. While THS would expect any application for a development of this size to include the developer’s assessment of the build against the 12 standards, this should be the basis for discussion with the local authority and other interested parties (including neighbours etc) rather than being accepted as definitive. It might also be helpful if the NP could indicate if any of the 12 questions have a higher priority than others.
H5	<p>Managing the volume of windfall developments</p> <ul style="list-style-type: none"> • Intent - the policy only seeks to consider the damage that the cumulative effects of new developments could have on the character and amenity of our existing natural and residential environments. This is too weak – ‘consider’ should be ‘limit’. • There should also be a recognition that the number of windfall developments achieved in the past will reduce as the available suitable land decreases. • Reference to these points would be more appropriate in the Policy as opposed to the Intent statement. • It is not clear how this policy would apply to e.g. an application to subdivide a large garden and build a single new dwelling. Does the policy mean that such a dwelling would have to be affordable?



<p>H6</p>	<p>Access and transport</p> <ul style="list-style-type: none"> • General comment: access and transport are essential for the town, both to attract and accommodate visitors and for the local population. While THS supports the desire to limit the growth of motorised transport, the Society considers that this will be challenging. Haslemere is a country town with a limited population that cannot support the kind of public transport system that a larger or higher density population would so that the number of households with more than one car is likely to increase notwithstanding the measures proposed. We would, however, strongly support an extension of the local bus network, particularly smaller Hoppa-style buses, which we consider to be most suited to the often narrow and twisting local roads and allow an extension of services to alleviate some of the need to travel by car. Unlike many other parking and traffic management matters, the provision of bus services is within WBC’s remit. • H6.1 – Parking. <i>"sufficient off-street parking so the need for on-street parking does not increase"</i> is called for. THS strongly supports this. We note that in the past WBC has permitted town-centre residential development with insufficient parking on the basis that residents may use public parking spaces. This makes parking for those wishing to access the town centre shopping areas more difficult and should not be permitted. The policy should consider how this will affect conversion of space above retail premises. In order to achieve sufficient parking spaces in higher-density, town-centre developments, applicants should be encouraged to include parking below the dwellings, either in a basement or at ground level. • Commuter parking. Commuter parking on the streets is an important issue and should be directly addressed by the Plan. THS would also welcome a further storey on the parking facility at the station but notes that this is entirely in the hands of Network Rail. In addition, consideration should be given to adding another deck to the WBC-owned car park at Weydown Road, though THS considers that additional parking at the station itself is a better solution. • Parking for shoppers and local workers. In order to ensure that commuters do not crowd out shoppers and local workers, THS would strongly support measures such as 4-hour limits on parking in some local car parks and residential streets, to the extent that this is within the remit of HTC or WBC. THS supports the Chamber of Commerce in their efforts to obtain the site behind Collingwood Batchelor as free parking for workers at local businesses. • H6.1 – Storage for bicycles. This is proposed as a requirement for all new developments. While supporting measures to encourage bicycle use in the town, THS notes that the narrow roads and many hills make this a less attractive form of transport than it may be in other areas. We suggest that this be recommended, but only where relevant e.g. not in sheltered housing (other than is appropriate for staff use).
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- **H6.1 – provision for electric car technologies.** This should apply to all developments and parking sites, not just those within 1km of the station where arguably, people should be encouraged to walk not ride in any event. There is a case for expanding the car charging points in every car park – especially at the station.
- **H6.1 – travel plans.** THS would want this requirement to apply to smaller developments, e.g. from 12 properties up. Given the size of the various settlements included in the NP, developments of more than 12 dwellings may well have a significant impact on local roads.
- **H6.2 – ‘where possible or appropriate’** needs to be added as this will be impossible in many locations.
- **H6.3 – linking the High Street and Wey Hill.** THS supports the principle of improving pedestrian and bicycle links around the town, particularly between the two key retail areas. The need for a better and safer pedestrian route from the station to the Wey Hill and Weydown Road car parks and the Wey Hill shopping area is urgent. The linking of the High Street area with Wey Hill is also recognised as important to the town and the construction of a new pedestrian access tunnel below the railway on spare land at the side of the bridge is the only feasible early way of improving the existing main link route, in conjunction with some widening of footpaths in Tanners Land and Lower Street, giving a shorter route than that suggested over the existing Church Lane footbridge and improving the town centre connection to the station. This would also permit the widening of the road below the bridge. A very similar tunnel was constructed in Stoke Road, Guildford some years ago. It is doubtful that the suggested relocation of the light industrial area will be welcomed by many of the businesses there and it is unlikely to be achieved for other reasons during the term of this NP. While building a tunnel would be a significant infrastructure project, THS cannot recall any other significant physical infrastructure improvements in Haslemere during the last 30 years.
- **H6.3 – Fig 2.** THS notes that making the footpath proposed in Fig 2 would require the removal of the industrial estate. It is not clear that Haslemere residents have been consulted about this (as a separate matter from the desirability of a footpath linking parts of the town) and it is clear that there would be an economic impact of doing this, assuming that a suitable site outside the town can be found and the existing landowners persuaded to move. THS would be concerned about the loss of employment should this site become residential. More practically, THS questions whether there is any realistic prospect of completing this project in the timeframe of the Neighbourhood Plan (to 2032). In the absence of any real information, THS does not have a view on whether or not this is a suitable longer-term plan overall, but does not feel that other ways of improving links between the two key retail areas of the town should be set aside in anticipation that the proposed footpath will be achieved.



	<ul style="list-style-type: none"> • General note on footpaths/cycle routes – should there be a more general presumption against removal of or damage/changes to footpaths and cycle paths in the area that support local travel and/or tourism? • H6.4 – alterations to roads etc. It is not clear here what is meant by ‘such developments should be encouraged’. THS supports encouragement to developers to improve access etc as listed but this alone would not be enough to make a development acceptable and the policy should make that clear. • H6.5 – public pedestrian access. This currently reads as if it refers to all developments, suggesting that all developments, of any size and wherever sited, must provide public pedestrian access across the site. This cannot be the intention. The wording needs to be tightened to make it clear exactly when this policy would apply.
H7	<p>High quality external design</p> <ul style="list-style-type: none"> • H7 – context. This refers to the way that the extensive woodland around the area conceals much of the development in the area, adding significantly to the character of the town and attractiveness of the area. Should the NP not attempt to protect this by adding more general prohibitions to the removal of woodland and groups of trees (beyond existing protections) and to developments which are starkly visible over long distances by reason of their situation, prominence or lack of surrounding woodland? • H7.1 – Haslemere Design Statement. THS strongly supports this requirement. • H7.2 – how much green space? The policy as given just says “additional public green space which contributes towards...” which is extremely vague. Also, rather than tying this requirement to the number of houses, would it not be better to tie it to the site area? Otherwise developments of smaller dwellings are more likely to be caught by this requirement than developments of a few larger houses. This seems counterintuitive.
H8	<p>Internal design, building standards THS supports this policy.</p>



H9	<p>Provide sufficient affordable housing of the right type</p> <ul style="list-style-type: none"> • Reference is made to WBC’s suggestion of 25 affordable houses per year in Haslemere. This implies a total of 300 new affordable properties over the 12-year period 2020-2032. Given that around half of the 990 required properties have already been built, so that approximately 495 are outstanding, this suggests that 60% of all remaining dwellings approved during the NP period are to be affordable. If this is the intention, THS believes that much stronger rules will be needed to achieve it. • It should be made clear whether this is a NP requirement. Will the non-achievement of this target preclude the building of ‘non-affordable’ houses until it is met? • It is not clear what size of development this policy applies to – is it the 6 (rural) and 11 (suburban) in LPP1 Policy AHN1? Could this limit be lowered to reflect the smaller developments more common in the NP area? • THS strongly supports the intention to support the delivery of affordable housing and to maintain that provision in perpetuity so that first-time buyers, young families, local workers etc are able to live in the NP area. Coupled with that, THS would strongly support the most rigorous enforcement of the 30% requirement (in LPP1 Policy AHN1) permitted and the use of the Community Land Trust to ensure that the housing remains affordable in perpetuity. THS would want all such dwellings to remain as affordable housing rather than seeing some proportion of it become market housing.
H10	<p>Provide an appropriate mix of housing types</p> <ul style="list-style-type: none"> • H10.1 – developments of 10 or more homes. As for policy H9, it is not clear if the requirement to build affordable homes bites here or not. • H10.2 – developments of fewer than 10 dwellings. It is not clear what is meant by “appropriate” here. Is this a reference only to avoidance of overdevelopment/cramming while meeting the 75dph or 45dph requirements? Or does it also refer to the sorts of housing in the surrounding area? And, if the latter, does that suggest that it would be inappropriate to build e.g. 1-bed homes in an area predominantly made up of 3 or 4-bed homes? This should match H5 – remain in character for the area etc...
H11	<p>Habitat protection</p> <ul style="list-style-type: none"> • This policy needs to be clarified as it’s a bit confused at the moment. The stated intent of the policy is to conserve and enhance the habitat and biodiversity within the Plan area, but it then refers to enhancing the landscape and scenic beauty of the AONB, which is not about habitat or biodiversity. THS suggests that H11 should be renamed “Trees and hedgerows” and



	<p>should protect these for all the reasons listed (not just biodiversity) across the Plan area. As noted earlier in the NP document, the wooded nature of the NP area adds a great deal to the character of the settlements here, since, together with the hills, it largely conceals the built-up areas making the area appear pleasantly rural. This is a key characteristic of the area and worthy of protection.</p> <ul style="list-style-type: none"> • H11.1 - The phrase “of good arboricultural or amenity value” should be further explained as it is not clear what is meant by it or how it should be judged. THS suggests that this assessment should be made in line with BS5837:2012 or an equivalent standard, by a suitably qualified expert. This has the additional advantage of also covering landscape and conservation value. <ul style="list-style-type: none"> • All planning applications within the plan area should include both a report under BS5837:2012 and an Environmental Impact Assessment and these documents should be provided, in full, with the rest of the application material on the WBC website for public information. • H11.1 – TPOs. It would be helpful for the policy to clarify how it fits with TPOs (for amenity value). Is the intention to give all trees, groups of trees or hedgerows which <i>would be eligible</i> to be covered by a TPO that level of protection even if a TPO has not been applied for? THS would support this intent. • H11.1 – re compensating for loss or damage. The policy could helpfully set out what form of compensation is required eg. whether the lost or damaged trees should be matched in maturity, what species (a match or always native trees?) and whether there should be 1 to 1 replacement or more, particularly if the lost trees were of significant size. The compensation policy should apply also to hedgerows. Finally, assessment of the effectiveness of replacement should be made after a period e.g. of 3 years since many saplings die in the first few years, especially if neglected. • Does H11 apply to <i>all</i> developments in the NP area? THS would support that requirement, though the requirement for a formal assessment under BS5837:2012 and an Environmental Impact Report might only apply to developments over a certain size, say 4 dwellings.
H12	<p>Dark skies</p> <ul style="list-style-type: none"> • THS supports the principle of minimum lighting for all developments (and in the Plan area generally) and of minimising light disturbance both to people and to wildlife, whether that be through lower lighting overall or other restrictions (see below). THS would like to see this policy applied not just to new builds but to any changes for which planning permission is required e.g. extensions, refurbishments and the installation of signs.



<p>H13</p>	<p>Local Green Spaces (within the settlement boundaries)</p> <ul style="list-style-type: none"> • There are several instances of "<i>development will only be permitted in very special circumstances</i>" which is very concerning. What constitutes a special circumstance? THS strongly suggests that it should be stated that development will NOT be permitted on these sites. The only special circumstance that THS can envisage is a request to build sports facilities to support recreation on the green space on those sites clearly intended for sports e.g. sites 9 and 10. • The area between Kings Road and Sun Brow that was exchanged for the Fairground area of common land should be included on this list. • All Local Green Spaces should meet minimum amenity standards i.e. they should be properly accessible and usable as public open spaces.
<p>H14</p>	<p>Wildlife corridors and stepping stones</p> <ul style="list-style-type: none"> • The Haslemere Society understands that H14 is intended as a ‘placeholder’ for a more detailed policy to be formulated once the biodiversity mapping work listed in the full NP document as Opportunity 18. This policy needs to be more clearly linked to that work. • In particular, the policy needs to state clearly and unequivocally what source should be used to identify wildlife corridors and stepping-stones that are covered by the policy. The Haslemere Society understands that the intent is that Haslemere Town Council will formally adopt a map of these sites and that this may be updated and amended at various points in the future. The Haslemere Society would support this process. • H14.2 - This requirement appears to set a higher standard for maintenance of biodiversity than policy H3. We would support the higher requirement in respect of these areas. • H14.2 – this should read “will be refused” rather than “will be resisted”. • H14.3 – this should read “...how they will fully mitigate...”



H15	<p>Retaining and encouraging local employment</p> <ul style="list-style-type: none"> • THS shares HTC's concern about the redevelopment of retail and commercial space within the Plan area as residential space. Notwithstanding the need for additional housing, the Plan area currently benefits from a number of retail centres and a range of other commercial businesses, which provide a focus for the settlements and significant local employment. Without these, the settlements would become dormitory towns and much less attractive. THS therefore strongly supports measures intended to maintain retail and commercial space within the Plan area. • THS notes that there is no separate document setting out a plan for the types of business or employment desired for the Plan area. In the absence of this, THS would like to register its support for a range of business interests, not just retail but also light industrial commerce to provide employment and locally the services required by a 21st century population. • H15.1 – reasonable steps. This is inherently difficult. We must recognise that, in the Plan area, a site may have significantly more value as a development site with planning permission for residential dwellings than it does as a going concern. This can give developers an incentive to seek to show that a site is not viable for retail or commercial purposes in order to get permission for change of use and subsequent residential development. This is not necessarily in the best interest of the town. If the owner of a business is determined to show that it is not viable, it is not difficult to get that evidence. At the same time, it is equally not in the best interests of residents for a site that has truly become unviable for business not to be developed as homes. A genuinely independent assessment is needed in each case. At a minimum, THS supports the requirement for an objective and third-party managed 12-month marketing campaign. All offers received should be made public.
H16	<p>Encouraging the growth of new and existing small businesses</p> <p>THS supports the measures set out here.</p>
H17	<p>Retaining, enhancing and managing changes to retail</p> <ul style="list-style-type: none"> • Currently there are regularly times when the existing supermarkets are operating at full capacity and shoppers have to drive round the car parks several times for a vacant parking space. Given the planned population increase in Haslemere and in surrounding areas outside the town extensions to parking and food stores will be necessary. The NP needs to recognise this and provide an appropriate policy. This is not covered in the draft. • H17.1 – Article 4 directions. THS agree and would support this.



	<ul style="list-style-type: none"> • H17.2 – should also take account of possible restriction in how the commercial/retail premises can operate in the future.
H18	<p>Encouraging an expanded visitor economy</p> <ul style="list-style-type: none"> • Reference is only made to attracting visitors by train. Most of the surrounding National Trust areas and the SDNP expect significant numbers of visitors to arrive by car and provide parking facilities. If the visitor economy is to be expanded the area must provide adequate parking for these visitors' cars. It is acknowledged that parking is scarce in Haslemere, so the logical conclusion is that more parking needs to be provided in the town. The NP must recognise these basic requirements required to meet stated policies. • Whilst the conversion of residential property to hotel use is supported by the NP the reverse is not specifically dealt with (Policy H15 refers to retaining employment sites, but hotels have a wider value in drawing visitors to the Plan area). Hotels are essential to support the visitor economy and tourism, especially in this gateway town to the SDNP. The demand for housing and the profit opportunities for residential developers presents a distinct threat to hotels as has recently been demonstrated and which urgently needs to be dealt with under this Policy by a statement indicating resistance to changes of use from hotel use. WBC have recently demonstrated a preference for residential development rather than maintaining existing hotel accommodation to the detriment of Haslemere's economy, which the NP should address. • H18.1 – conversion of residential to hotel use. Support should also depend on the development meeting any other relevant parts of the NP and also on neighbour amenity. As it stands, this reads as if on-site parking is the only requirement before such a development will be supported. This cannot be the only requirement and The Haslemere Society would strongly resist that indication. • H18.2 – developments for recreational and leisure purposes. It should be made clear that any such development outside the settlement boundary will need to comply with all the other NP requirements on this e.g. not more than 40% increase in footprint, minimising visual impact, maintaining or enhancing biodiversity, dark skies etc. Surely, the NP is not stating that an expanded visitor economy is a higher priority than maintaining the green fingers and biodiversity etc that make Haslemere such an attractive place to live and to visit in the first place.



Section 4 – Delivery and monitoring

The NP should set out clearly here who is actually responsible for decision-making, monitoring and delivering each policy and who is entitled to be consulted but is not part of the decision-making process. There should be absolute clarity about where the responsibility lies for each policy and for the different elements within each policy. As it stands, the NP is not sufficiently explicit on these matters.

Section 5 - Opportunities

The development and adoption of the NP has been subject to high standards of transparency and consultation. THS would want to see these high standards maintained in the pursuance of the opportunities listed in the Plan. THS notes that a number of the opportunities explicitly request some form of further planning or design and these should be made public and consulted on as appropriate.

Opportunities 1 (Wey Hill Fairground)

- This states that *"WBC, as the landowner, should do nothing to the site that would prejudice its future redevelopment or build infrastructure on the site that it could not easily 'write off' should a development proposal come forward."* In a similar manner to that identified above with respect to other areas of the NP, The Haslemere Society would suggest that the word *"should"* be replaced with *"must"*.
- THS notes that a Working Party is currently examining proposals for this site and would welcome an update on its progress and information on the expected timeframe for its report and for the project as a whole.
- Whilst on this subject, with WBC having been successful in exchanging this area of former common land for the area of steep gradient woodland located between Kings Road and Sun Brow that is currently an unofficial dumping ground for Tesco trolleys, old garden chairs, etc., should the NP not include some commitment to tidying and upgrading this site for recreational use?

Opportunities 2 (Relocation of industrial uses north of station). This Opportunity suggests a material change to Haslemere town, removing a significant commercial area to replace it with dwellings, so there are clear costs as well as potential benefits and THS would be concerned by the loss of this employment space as well as the loss of amenity provided by the central location of these businesses. It is quite possible that the move to a more distant site would be enough to make the businesses unprofitable so that they would be entirely lost. No evidence is presented here to support the suggestion, so it is not clear on what basis the proposal is made. THS therefore reserves judgement on the proposal as a whole but has severe



reservations. THS notes that such a significant change should be clearly supported by evidence and should involve proper consultation with residents and the affected businesses before being attempted. Moreover, it seems unlikely that any significant progress could be made during the Plan period. Approval of the NP should not be taken as approval for this specific development.

Opportunities 3 (Haslemere Design Statement). THS notes that HTC called for an update of the Haslemere Design Statement several years ago. THS supports this proposal and would encourage it to be taken forward as a matter of priority.

Opportunities 4 (Develop a central design brief).

- THS supports the proposal to develop a central design brief for this area (and, indeed, other key centres in the Plan area) on the understanding that the 3 strategic housing sites referred to are 5-21 Wey Hill (DS09 in the LPP2 2018), land at Wey Hill Youth Campus (DS12) and land at the rear of 4 Wey Hill (DS19) and subject to our comments under Opportunities 2 about the industrial area north of the station. THS does not object to the inclusion of this area (other than the station site to be consistent) in any design brief so long as appropriate consultation is done either before or as part of the work.
- THS notes that creation of a design brief of this kind will need expert input which will need to be included within any pre-planning development budget by either HTC or WBC.

Opportunities 5 (Development plan for Hindhead and Beacon Hill). THS notes that an Article 4 application is pending at Beacon Hill. As for Opportunity 4, this will require professional input that will need to be included within any pre-planning development budget by either HTC or WBC, as above.

Opportunities 6 (Long-term housing needs). This should be considered in combination with the section on Flexibility above. Clearly it is incumbent on local authorities to remain flexible in the face of changes in demand and ability to meet current demand and that should not be left until the current NP expires. However, any changes should be subject to the same level of community engagement as this Plan.

Opportunities 7 (Haslemere publicity office).

- THS supports both an office to support tourism in the Plan area (not just Haslemere town) and an office to support incoming businesses and employers but is not convinced that there should be a single office covering both these issues.



- THS notes that the local Chamber of Commerce is working towards making Haslemere High Street and Wey Hill a Business Investment Area, which would provide funds to support the business development of the area. Any promotion of the plan area to employers and businesses should be done in consultation with the Chamber of Commerce.
- THS would strongly encourage the appointment of a Town Manager with responsibility for development of business and employment opportunities in the area (again, coverage should not be limited to Haslemere town).

Opportunities 8 (develop site specific design briefs). THS supports the proposal that HTC and WBS should develop site specific design briefs for larger sites designated in LPP2. This will, again, require paid professional input. It should not involve input from developers however; this is the opportunity for the local residents, acting through local authorities, to set out what is desired on these sites to meet not just housing need but also the wider needs of the town. Developers should then show how they will meet these briefs.

Opportunities 9 (Traffic congestion at Tesco/Lion Lane junction). THS recognises that there is sometimes severe congestion at this site, which can have an impact on traffic right back along lower street to the station, clogging up a main artery of the town. Traffic flow is a technical subject however, so THS would welcome expert input including assessment of street parking before a final decision is made on the best approach to resolving the issue.

Opportunities 10 (Critchmere Hill junction) Again, THS would welcome suggestions for improvements to this junction but considers that professional input is needed.

Opportunities 11 (Reduction of traffic in central Haslemere).

- THS strongly supports the proposal to attempt to reduce through-traffic in Haslemere but does not consider that the specific suggestions made are necessarily the right way to do this and notes that no evidence is given in support of them. Shepherd's Hill in particular is narrow and twisting and already has significant back-up at busy times as traffic tries to get out onto Lower Street. Once again, professional input is needed and will have to be paid for in order to address the needs of all the different stakeholders here.
- Considering Opportunities 9, 10 and 11 together with the more general remarks throughout the Plan document about the need to manage congestion and parking within the Plan area, would it not make sense to undertake a professionally-supported review of traffic management across the wider area on a holistic basis, rather than trying to pick off specific sites in isolation? THS notes that the Plan area presents very



particular difficulties to road widening and other improvements, namely the hilly topography, narrow roads, existing buildings, three low railway bridges and the busy station commuter hub.

Opportunities 12 (Improving shopping areas).

- Although THS are familiar with the concept it would be helpful to explain what is meant by 'Poyntonisation' since it is not a term in common use. If this is a reference to a shift to mixed use streets, with removal of street signs etc, then THS would support this in suitable parts of the Plan area if done in a way that is in keeping with the character of the surrounding area.
- The proposed project could be extended to include the review THS proposes in bullet two of Opportunity 11.
- Any decision should be subject to the holistic review project proposed, but THS notes that loss of on-street parking on West Street and/or Wey Hill would not be without cost and risks causing significant damage to these retail areas. It should not be assumed that improved traffic flow is worth the loss of this amenity.

Opportunities 13 (Parking management)

- THS would prioritise the needs of residents, shoppers and visitors, who make a contribution to the town, over those of commuters who may contribute no more than what they pay for parking and who add considerably to the congestion in the town at some times. The removal of commuter parking from the roads around the station through more dedicated parking facilities and timed restrictions on street parking are urgently required.
- Re "*introduce up-to-date methods of payment at all parking locations*", THS is cautious of 'pay-by-smartphone-app' technology, the concern being that such technology could signal the introduction of rapidly increasing parking charges. Indeed, THS would support the introduction of cheaper or even free parking to support the retail parts of the Plan area so far as is possible.
- In recognition that not everyone has access to smartphone technology and that this does not always operate well in the Plan area, it should always be possible to pay for parking by other means.
- It must be recognised in the Plan that the economic prosperity of the Plan area is dependent on the provision of adequate and reasonably-priced car parking to encourage visitors and support local shops.
- THS supports the proposal to investigate whether HTC can take over management of public parking in Haslemere.



Opportunities 14 (Cycle/pedestrian pavement share) Whilst this is a commendable objective for Hindhead Road and THS supports it, the NP would do well to highlight (more than is covered under 'Opportunities 15') the fact that most of our roads are now so neglected with respect to on-going maintenance that they are not fit for purpose for cycling. Indeed, Surrey County Council has to a large degree and for a considerable period been unable to maintain the roads in and around Haslemere to an acceptable standard and, in a similar vein, WBC has not kept pace with the problem of overgrown vegetation on footpaths or roadside tree maintenance.

Opportunities 15 (Route improvement). THS supports this in principle.

- It would be helpful if the Plan could set out which 'current design standards' are referred to here.
- It would be helpful if the Plan could clarify which bodies are responsible for the maintenance arrangements listed. THS notes however that it is simply unacceptable for service utilities to leave areas of road or pavement in poor condition after undertaking works. THS understands that there are regulations in place requiring acceptable 'making good' after such works but notes that they do not appear to be routinely enforced in the Plan area. THS would welcome a more active approach to such monitoring and enforcement.

Opportunities 16 (Negotiations to increase hours of operation and facilities for existing bus services). As noted in the detailed policies section above, THS would welcome an improved bus network, possibly using smaller buses, as a way of helping to reduce traffic in the Plan area. Other destinations and routes might also be considered.

Opportunities 17 (Taxi/car share pilot scheme to be developed). WBC should be listed as a partner, since they are responsible for licensing taxis operating in the Waverley area.

Opportunities 18 (Identify and designate wildlife corridors and stepping stones). THS notes that this project is essential to support Policy H14 and is already underway. THS is a sponsor of this project, and HTC has provided a grant to support the initial work. Once complete, this project will need to provide a clear map of all the relevant corridors and stepping stones, showing how they link the various other protected sites around the Plan area. This will be essential for developers but will also be of interest to visitors and local residents.