



The Planning Officer  
Waverley Borough Council  
BY EMAIL

24 October 2024

Dear Sir

Orchard House (WA/2024/01727) - Objection

The Haslemere Society wishes to object to the above application on both general and detailed grounds, as set out below.

**General grounds**

1. The application site lies outside the Haslemere settlement boundary but within the buffer zones for two SPAs and an area of ancient woodland. In addition, the entire site is within the Green Belt and part of it lies within the Surrey Hills National Landscape (formerly AONB). The default position therefore would be to refuse permission for the erection of any new homes here.
2. The applicant asserts that the proposal falls within exceptions set out in the NPPF and LPP2. We disagree on the detail, as set out below. But a focus on the detail of the rules misses the wider point that the proposal is to remove a group of small-scale, single-storey, wooden outbuildings that fit within the rural landscape and replace them with two detached dwellings, with all the additional noise and light pollution and traffic that would bring. This is unquestionably an urbanisation of the area, albeit in a relatively small way.
3. If permitted, this would set a very unhelpful precedent: many properties in the area have outbuildings that can be held to be 'ancillary to residential purposes'. Indeed, it is generally possible to build such structures without planning permission. Granting this permission would potentially encourage such action with a view to using that as a basis for erecting a 'replacement' building at a later date.

**Detailed grounds**

4. The DAS refers to the exceptions in the NPPF Paragraph 154 that relate both to 'already developed land' (p.154(g)) and to 'replacement buildings' (p.154(d)). It is not clear which exceptions are considered to apply where.
5. **Previously developed land.** The DAS, paragraph 1.2b, states that the site is on "previously developed land". Clearly, in terms of the footprint of the existing buildings

compared to the proposed footprint of the new buildings, there is little overlap. The claim that the land is 'previously developed' therefore hangs on the NPPF Glossary definition, which includes the curtilage of developed land within 'previously developed land'. However, the Glossary specifically states that "...it should not be assumed that the whole of the curtilage should be developed..". In practice, taking the site as a whole, very little of it is currently developed and the existing development is made up of small-scale wooden (i.e. semi-temporary) buildings. This seems a very small basis on which to claim that the entire site is 'previously developed'. Again, accepting this argument would set a very poor precedent in terms of protecting this land.

6. **Replacement buildings.** The exception set out in NPPF Paragraph 154(d) and in LPP2 DM14, a) requires the replacement building to be 'in the same use'. The applicant asserts that the existing buildings have all be either in residential use or used as ancillary to residential use. More specifically, with the exception of the annex, the other buildings are all listed as 'storage'. While 'storage' may technically fall within 'residential use' for planning purposes it is clearly not the same as an actual dwelling. The proposed replacement is, in a substantive way, not a like for like replacement in terms of use.
7. The same rules require the new building not to be 'materially larger than the existing building'. The DAS demonstrates that the footprint of the proposed buildings is smaller than the combined footprint of the existing buildings. We note however that DM14, a) states that whether or not the new building is 'materially larger' will be assessed by considering changes in 'scale, mass, height, and floorspace'. The applicant's own calculations show that the new buildings are significantly larger in mass (GEFR). In addition, of course, each of the two new buildings will be significantly larger in mass and in scale than any of the small buildings they replace. The new buildings are also significantly greater in height than the buildings they are to replace. The DAS refers to DM14 Explanatory Note 3.17 which notes that "developments which exceed these guidelines may be acceptable in some circumstances including where the floorspace is created within the volume of the existing building, such as conversion of lofts or cellars." This exception is not relevant: the floorspace is not being created within the volume of the existing buildings, nor could it have been. Taken together, we consider that the proposal does not meet the tests for the 'replacement buildings' exception.
8. **National Landscape.** Half of the site, including the proposed site of one of the two dwellings, lies within the boundary of the Surrey Hills National Landscape. The NPPF, paragraph 182, requires that great weight should be given to conserving and enhancing landscape and scenic beauty on such land. The construction of a dwelling here, no matter how attractive, manifestly does not 'conserve and enhance' the landscape and scenic beauty of the site. On this ground alone, the application should be rejected.
9. **Preserving the openness of the Green Belt.** Policy DM14, d) sets out various factors that will be considered when assessing whether or not the development preserves the openness of the Green Belt. We have commented on the scale etc of the development above but we note that we consider the development fails on all four of the tests here. The erection of two family homes will create noise and light pollution and increase traffic. The buildings will be effectively permanent, unlike those they replace and the existing development on the site is very limited.

10. Finally, we note that the DAS, paragraph 1.2, claims that the new dwellings are 'close to the settlement boundary where new development is directed by local plan policy'. This is incorrect. The Neighbourhood Plan, Policy H1, makes clear a strong preference for new development to lie within, not outside, the settlement boundary.

For all these reasons we strongly urge WBC to reject this application.

Yours Sincerely

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