



Planning Department,
Waverley Borough Council,
The Burys,
Godalming, GU7 1HR. BY EMAIL

2 December 2016

Dear Sirs,

Planning Application 2016/2144
Sturt Farm & Longdene House, Haslemere.

This 'Hybrid' application contains effectively five separate elements viz:

- 1) Relocation of access to 135 dwellings the subject of outline approval 2014/1054.
(the application uses a wrong and intentionally misleading description.)
- 2) Change of use of agricultural land to public open space to be made suitable for SANG and provided in accordance with application 2014/1054
- 3) Change of use of agricultural land to public open space to be made available as SANG
- 4) Change of use, extension and alteration of office building to provide one dwelling with erection of detached garage.
- 5) Outline application with access and landscaping to be determined for the erection of up to 13 dwellings following demolition of two dwellings, glasshouses and out buildings.

The Haslemere Society wishes to strongly object to elements (1) and (5) and to comment on the other elements as follows :-



Element 1

1.1) It is stated that this is a detailed application relating to an approval which is only for an outline application. It would be inappropriate to consider this element until a detailed application is made against 2014/1054. Also this element is a repeat of application 2016/1342 which was withdrawn by the applicant immediately following the reasoned and critical objections by The Haslemere Society published in The Haslemere Herald, which are still relevant to this application and expressed again in Appendix 1.

1.2) It is stated that this application seeks to provide an improved access [over the 2014/1054 outline approval] but save for stating “it represents a low beneficial impact’ there are no clear material advantages stated for this relocation of the access. The fundamental reason for proposing this relocation of the access is that it is less costly to construct than the access for which approval has been given.

1.3) This proposal will still require earthworks and will result in the loss of trees and green verges and to state that “it will not have any material impact on the living conditions of neighbouring residents and safe access for pedestrians” is entirely wrong and misleading.

1.4) The amount of detail provided is inadequate for a detailed application and it omits any indication of how this alternative access will join up with the new roadway within the new housing estate.

1.5) The artistic impression of the reasonably attractive approved access off Sturt Road is conveniently shown with limited tree planting and then concludes from another artistic impression for this proposal, with a considerable number of trees in this location, that the relocation will result in the masking of the existing Sun Brow houses which are clearly visible today from Sturt Road.

1.6) This proposal requires the construction of car parking facilities within the AONB and results in the conversion of a section of the existing Public Footpath 35 to access road. It is also noted that only a 5.0m wide road is shown (less wide than the approved access) which is inadequate to accommodate the traffic flows from an estate of 135 houses which will include large commercial vehicles.



1.7) The suggestion that this proposal will improve the access to the four existing dwellings is wrong as it will result in the residents having to contend with large numbers of cars, delivery vans and refuse trucks entering and leaving the estate of 135 houses whereas they currently enjoy their own 'private' access. The residents have not been consulted on this. It is a fact that housing estates experience a considerable numbers of van deliveries as a consequence of internet shopping.

PLEASE REFER TO APPENDIX 1 FOR FURTHER COMMENTS ON ITEM 1

Element 2

We would not describe this as agricultural land. We leave the determination of the suitability of this land for the SANG requirements of 2014/1054 to WBC planners.

Element 3

The offering of this land is totally irrelevant to the assessment of the other elements of this application and should therefore not have been included.

Furthermore we question the suggested calculation of required SANG against the 467 unapproved Haslemere housing target and whether the land would meet the SANG accessibility requirements or the strict requirements of Natural England.

The offer should be dismissed relative to this application 2016/2144.

Element 4

Whilst we regret another loss of employment space in Haslemere we are not raising objections to this element of the application.

Element 5

5.1) A similar application 2016/1226 has recently been refused by WBC for the following reasons:- *'resulting urbanising effect would impact and harm the landscape character and cause material harm to the intrinsic character, beauty and openness of the countryside beyond the Green Belt, the AONB and AGLV'*.



There are no exceptional circumstances that would justify this development in the designated ANOB and it has not been demonstrated that the proposal could not be developed outside the designated area contrary to policies C2, C3 of the Local Plan and paragraphs 17, 116 & 117 of the NPPF. The development fails to provide a sustainable, inclusive and mixed community contrary to policy H5 of the Local Plan and paragraphs 17 & 50 of the NPPF

Insufficient information is provided to demonstrate that a feasible drainage strategy could be implemented – which could result in an unacceptable increase in surface water runoff and increased flood risk contrary to NPPF paragraph 103.

The Haslemere Society concurs with these reasons for refusal.

5.2) Fairhurst's Report on storm water drainage [Flood Prevention] has been submitted but the appendices including the drawing showing the drainage strategy are omitted. There is therefore no strategy provided.

The Report indicates that SCC have confirmed that they would accept infiltration [into the ground] of water from roads and car park areas (with hydrocarbons) if it is pre treated, even though the site lies in a water source protection zone 1 and 2. The report indicates the necessity to carry out site infiltration (soakage) tests to confirm the assumed rate of infiltration.

Whether the Environment Agency, (who are responsible for ensuring the implementation of relevant E U regulations), will allow this infiltration is not confirmed and if not this water will have to be discharged into the public sewer at an attenuated rate necessitating a large storage chamber 2.4m x 1.5m x 37m long. It is indicated that Thames Water will not normally accept storm water into their sewer system but would be amenable in this instance due to the water source protection zone. Thames Water's letter of 2 November 2016 indicates that approval is required from their Developer Services but it does not give or confirm this specific approval.

Also Fairhurst's report indicates that significant storage facilities are required for other surface water from roofs etc. as well as from the roads and car parking areas but there are no details indicated.

Clearly this is an outstanding issue.



5.3) The additional traffic which the proposed development will generate will have a serious adverse effect on the particularly narrow Hedgehog Lane and Longdene Road where many residents are forced to park their cars as the hilly terrain precludes off street parking. When considering 2014/1054 it was considered important that all traffic be routed via the A286 by all parties (including this developer) and not routed via unsuitable Hedgehog Lane and Longdene Road.

5.4) It is noted that the Illustrative Master Plan (Rev. 3) 078-PL-013 (Block Plan) indicates in a different colour a large area (5) adjacent Longdene House far in excess of that necessary for three houses and we question whether there are further development plans for this ANOB area. If WBC were to be minded to approve this housing construction the area of land to the east and south of Longdene House needs to be curtailed.

5.5) It is stated that an exhibition was held for 3.5 hours on 27 April 2016 which was attended by only 8 people which is not surprising as there was no pre notification in the public press. It is unclear whether this brief consultation included the proposed relocation of the access to the 135 houses granted outline permission.

Feedback is described as ‘generally positive in a desire to see the site deliver new housing in a sensitive manner’.

We do not agree with the claim that a satisfactory Statutory Public Consultation has been held and remain unconvinced that the fundamental question of proposing to build in an AONB was addressed with the public.

5.7) Considerable concern was expressed over the loss of AONB land relative to the granting of outline planning permission for 135 houses. Not satisfied with that outline approval the applicant is now seeking permission to build even more houses on this AONB/AGLV land. It must be recognised that these proposed thirteen further houses would have a cumulative effect on the loss of valuable AONB land.

5.8) The Inspector for a previous 1979/80 Planning Appeal, following a refusal for housing on this site, is reported as stating :

It is on the urban fringe that landscape is most valuable. An extensive residential development cannot be reconciled with the retention of natural beauty. To justify such development there must be a very special case of need.



Given the availability of other identified less sensitive sites in Haslemere and that no special case has been made this proposal should not be allowed.

5.9) Regarding the three new houses proposed in the vicinity of Longdene House following demolitions we have not been able to see any information in the application which compares floor areas of existing and new to check for example compliance with the 40% rule. Substituting large detached houses for a greenhouse and open sided storage sheds is clearly not acceptable. These are further reasons why planning approval should not be given for these proposed houses.

PLEASE REFER TO APPENDIX 2 FOR FURTHER COMMENTS ON ITEM 5

CONCLUSIONS :

The Haslemere Society, after careful consideration, considers that the access road to the estate of 135 houses should very clearly remain in the position for which outline permission was granted and not transferred to the location proposed in this application.

No further housing (in addition to the 135 for which outline planning permission has been granted) should be allowed on this area of AONB and AGLV land. The AONB designation is the highest planning protection available and the fact that this land was so designated illustrates the importance of this 'green lung' area within the town.



APPENDIX 1 (RE ELEMENT 1) RELOCATED ACCESS TO ESTATE OF 135 HOUSES

The following points were made by The Haslemere Society on application 2016/1342 which the applicant subsequently withdrew and which are still relevant to this element of this application.

- 1) The existing Sturt Farm buildings are all original barns and farm buildings connected with historic 17th Century Sturt Farm. Three of the buildings are Grade II Listed, with origins dating from 17th to 19th century, another is locally listed as a building of Local Merit. All four form a cohesive cluster with overlapping curtilages. The exteriors have been exceptionally well preserved/restored – converted to dwellings but retaining agricultural characteristics; the whole providing an attractive rural settlement adjoining open countryside. The properties are accessed by a short exclusive service road, which terminates at a public footpath, along which there is minimal vehicular traffic which has no adverse effect on the overall setting.
- 2) This proposal is to widen and lengthen this short residential access with associated junction alterations to enable it to serve as the entrance/exit route to the planned housing estate for which outline approval has been granted for up to 135 dwellings. Appropriate access for this major development has already been established following a comprehensive transport assessment and numerous infrastructure improvements negotiated with the County Highway Authority and incorporated as a condition of approval.
- 3) In connection with the approval of 2014/1054 the County Highway Authority agreed traffic generation assessments of two way vehicle movements of 80 per hour in the morning peak and 78 per hour in the evening and a total of 680 vehicle movements per day – an annual total in the region of 200,000. This proposal effectively redirects this very significant amount of traffic within a few metres of these listed buildings with their current exclusive and tranquil short access to the main road.
- 4) These listed buildings, as irreplaceable Heritage Assets have the protection afforded by the National Planning Policy Framework paragraph 132 which states :



When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional.

The status and importance of these buildings has already been recognised by Waverley. There are several statements in the Officer's Report for application 2014/1054 (pages 81-83) one of which states :

The significance of Sturt Farm and its agricultural buildings lie in the survival of the complex and the continued opportunities to recognise, understand and appreciate the agricultural character of the collection of historic buildings and their spatial arrangement.

5) The proposed access road and expanded junction, and the traffic flows which would be generated straight through the heart of this small complex would destroy that cohesiveness and recognisable relationship of the buildings to each other. Their rural character would be compromised by introducing the direct connection between Sturt Farm and an estate of 135 houses, thereby losing the invaluable separation intended with the access for which outline approval has been given. The historic significance referred to by Waverley Officers would no longer be apparent.

6) When considering the proposed access for 2014/1054 the Officers including the Historic Buildings Officer, were of the view that although significantly to the west of the settlement it would nevertheless fail to preserve the setting and cause harm to these historic buildings. The alternative access now being proposed would pass within approximately 2 metres of the nearest building compared with fourteen metres for the approved access and would consequently have a significantly more detrimental effect on the listed buildings and their occupants.

7) For application 2014/1054 it was concluded that the 'less than substantial harm' to the listed buildings could be outweighed by the public benefit of the housing development. This proposal does not increase any public benefit, the housing scheme can proceed with the approved access which would direct the 200,000 vehicle movements per year further away from this settlement and its listed buildings. These vehicle movements and queuing of vehicles at peak morning rush hours directly outside these houses will create a considerable loss of amenity compared to the tranquil private access currently enjoyed.



APPENDIX 2 (RE ELEMENT 5) ERECTION OF UP TO 13 DWELLINGS

The following points were made by The Haslemere Society relative to application 2016/1225 which was withdrawn but these are still relevant to Element 5 of this application.

1) The application site is within one of three areas identified in the Haslemere Design Statement as a special Green Area, which in the words of the Statement are *“one of the very important factors regarding the town and its ambience”* and *“an integral part of the character and intrinsic value of the town **and should be retained”*** (HDS Area 6 page 43)

2) The entire site is an AONB or AGLV and thus subject to the NPPF, Waverley Local Plan and Surrey Hills Management Plan 2014-2019 policies applicable to such designations. The governing principles of which are :

*“great weight should be given to **conserving landscape and scenic beauty** in National Parks, the Broads and AONBs which have the **highest status of protection** in relation to landscape and scenic beauty”.* (NPPF 115)

*“**planning permission should be refused for major developments in these designated areas** except in exceptional circumstances and where it can be demonstrated they are in the public interest”* (NPPF116)

*“The Surrey Hills and High Weald AONBs are of National importance. The primary aim of designation is to **conserve and enhance their natural beauty**. Development inconsistent with this primary aim **will not be permitted** unless proven national interest and lack of alternative sites has been demonstrated”.* (WBC C3a)

*“great weight will be attached to **any adverse impact that a development would have on the amenity, landscape and scenic beauty of the AONB (SHMP LU1)***

Any development in this green field site Area A would be inconsistent with the purposes of these landscape designations and we fully endorse the response and recommendations of the Surrey Hills Planning Advisor that this application be refused as being contrary to or in conflict with the applicable planning policies.

3) The new Waverley Local Plan is at an advanced stage and any temporary shortfall in the five year housing supply in the Borough will be overcome soon. We would advocate that the determination of opportunistic applications such as this one , which would have an irrevocable adverse impact on the landscape should not be influenced by short term considerations but by the underlying principles set out above.

