



The Inspector
BY EMAIL

12 October 2023

Dear Sir

Land Centred Coordinates 489803 131978 Midhurst Road, Haslemere
(APP/R3650/W/23/3327643 & WA/2022/01887) - Objection

The Haslemere Society objected to WA/2022/01887 and supported WBC's decision on that application. The Society strongly objects to the appeal against this decision and wishes, on behalf of our 500 members, to make the following representations to the Public Inquiry.

Area of Outstanding Natural Beauty

1. The site of the proposed development lies within an Area of Outstanding Natural Beauty. It is a genuinely beautiful landscape, characteristic of the town, with a mix of wooded hills and open grassland and long views over to the South Downs National Park. The area forms part of the gateway to Haslemere from the south, where the town is approached along a green wooded tunnel of mature trees with open grassland on either side before the town is entered along the picturesque Shepherd's Hill. This is a deeply evocative landscape, specifically mentioned in the Haslemere Design Statement. The site is also visible from a number of other key points in the area, including Gibbet Hill at Hindhead, and clearly forms part of the setting of the South Downs National Park.
2. The proposed development would destroy the great beauty and tranquillity of the area. The Appellant makes much of the proportion of the site that would not be built on, but there is a step change from an entirely open, natural piece of countryside to one with 111 dwellings, with their gardens and a road, set within some more open land. Aside from the buildings themselves, a significant number of the trees along the Midhurst Road would be felled and the approach to the town would become just another urban landscape. The Appellant argues that the adverse effects of the proposed development would not outweigh, let alone "significantly and demonstrably" outweigh, the benefits of the scheme. We cannot agree. This beautiful landscape will be lost forever if this scheme is permitted to go ahead.
3. In addition to being on AONB land, the site is outside the settlement boundary and is not an allocated housing site. Nor is any part of the site brownfield. The Appellant quotes the LPP1's comment that the first focus for development will be within the settlement - but the site is *not* within the settlement. Indeed, the fact that the site is immediately adjacent to the boundary arguably makes it worse, since it would be just sprawl. The current Neighbourhood Plan states that development outside the

settlement boundary will be strictly controlled. This major development proposal does not conform to this and would be against the clearly expressed wishes of the community.

Benefits to the community

4. The Appellant refers to the CIL money as if it is a pure gift to the people of the town but the addition of a development of this size will place significant additional demands on the town's infrastructure. Money alone cannot meet those demands: money is not doctors and nurses or surgery premises, it cannot widen the B2131 at Lower Street or the A286 at Shepherds Hill, nor does it provide additional parking space in the town.
5. The Appellant argues that the fact that the site is currently in private hands with very little public access means it offers no public benefits so that the recreation and learning opportunities the development will allegedly provide are by definition an improvement. This is to ignore the value of the sense of the countryside crowding round the town afforded by that area of undeveloped green on the boundary, providing peace, tranquillity and real darkness at night, as well as the beautiful and characteristic views on the approach to Shepherd's Hill. It also ignores the fact that there is already a very significant network of public paths and bridleways around the town and into the surrounding countryside.
6. The Appellant makes much of the proposed new Scout premises to be provided as part of the development. We understand that alternative provision outside the AONB has been offered. Although it may be less attractive than the offer included in this development the Scouts would not be homeless if this does not go ahead. Furthermore, it should be noted that there are currently 120 children now in the troop or wanting to join, against a Haslemere population of some 11,000 (the figure of 120 comes from one of the two versions of Paul Buckler's letters on the WBC website – in the second copy of the letter this paragraph has been redacted but we assume the figure to be correct). While the Society strongly supports play and learning provision for local children this is a small part of a very significant decision. And of course the children and young adults in the Scouts have as much interest as anyone in maintaining the local landscape and environment for future generations.

Biodiversity

7. The Appellant claims that the proposed development will bring a Biodiversity Net Gain of 35%. We are not ecologists, but we note that the material provided by the Appellant for their earlier development, adjacent to the current one and permitted on appeal (original application WA/2020/1213), claimed it would deliver a BNG of 25%. A review by Professor Tom Oliver, an independent expert, found instead that the development will deliver a net *loss* of diversity of 44.64%. A review of the current application by a local ecology expert has also highlighted specific errors in the calculation, for example some areas have been scored as having a 'low' strategic significance where they should be rated 'high', and the calculation overall does not take into account the wider impact of the development on local strategic wildlife corridors. Further weaknesses in the ecological assessment of the site and the Appellant's proposed mitigation are highlighted by Haslemere Vision and others in their submissions.

8. The claim of a BNG of 35% is a very bold claim and a very important one given the site. It is also, on the face of it, hard to believe. The proposed development would bring 111 dwellings with their residents and their pets (cats are a particular issue), together with the Scouts and the various other bodies they say they would allow to use their facilities and the walkers and other visitors the Appellant claims would make use of the site. The increased disturbance, light and noise pollution etc from these in an area current hardly visited makes it hard to see how there can be a long-term net rise of 35% in biodiversity. Given the very real and substantive concerns raised by independent experts and bodies such as Surrey Wildlife Trust, it is imperative that these claims by the Appellant be thoroughly tested.
9. We note as an aside that any benefits arising from the SANG will already be available to the community as it is part of the earlier development. Indeed, the benefit of the SANG to the community will inevitably be diluted if this current application is permitted.

Transport to and from the town and station

10. The Appellant refers to the proposed new development as within walking and cycling distance of the town and the station with reduced need for a use of a private car. This is part of their claim that the site is sustainable. However, the application makes no mention of the fact that the site is at the top of a significant hill. Walking or cycling to the town centre may be quite plausible; walking back is another matter, particularly if carrying shopping or with small children – or if it is dark or raining. The access routes, a network of small roads lying between the development and the town, are narrow and have no pavements. They are also generally not well-lit and, while this could be changed, it would add to light pollution and environmental damage. It is inevitable that residents would use a car for a significant proportion of journeys, entering the town along Shepherd's Hill, an area that already suffers very significant congestion at peak times of day. Parking is also already at a premium in the town and the proposed development would worsen this. The development would thereby have a material detrimental effect on residents and visitors.

Failings in the planning system

11. Finally, the applicant makes repeated reference to issues of one sort or another that they have had with WBC e.g. the delays in making the initial decision, delays with the LPP2 etc., and argues that these provide additional grounds for granting the application. If it is true that WBC has struggled in these ways then it is the community of Haslemere that is being let down – and we had no hand in causing the problems. We are all well aware of the pressure that Councils are under, exacerbated by Covid, and the impact of this on Planning Departments around the country. Budgetary issues have made it common for conditions on permitted developments not to be actively assessed and even clear breaches are not always pursued, including breaches of s106 commitments, thus severely undermining the extent to which reliance can be placed on such commitments. These issues primarily hurt the community, not the developers. Allowing them to provide additional grounds for granting proposals such as this is to let the community down a second time.

Yours Sincerely

S. Dullaway (by email)

(on behalf of The Haslemere Society Planning Group)