



c/o 36 Petworth Road
Haslemere
GU27 2HZ

Members of Haslemere Town Council Planning Committee

8th September 2020

Dear Councillors,

Planning Application WA/2020/1213 – Red Court

The Haslemere Society (THS) wishes to make you aware of its objection to this application. The notes below will in due course be included within our formal objection to the proposed plans for the development of Red Court. However, we wish to provide you with an advanced note of our current thinking on the five major factors which we believe you should take into account when considering the application at your meeting on the 10th September.

Material issues to be considered in the planning decision:

1. Clean water supply

Everyone within the town of Haslemere and its surrounding villages is very aware of the critical issues facing Thames Water over the continued supply of clean water to their customers. There have been many recent outages causing material distress to local residents.

Given the inability of Thames Water to provide an uninterrupted supply to local residents it is inconceivable that planning applications that materially increase demand can be considered until such time as the supplier can provide absolute assurances that it is able to meet existing and increased demand consistent with the requirements of LPP2.

THS strongly feel that unless and until Thames Water can demonstrate they have taken all necessary actions and investment to provide such assurances that the aquifer can support the future water demand; that the condition and capacity of the distribution system is adequate; that the number of well points is adequate; that the pumping capacity is adequate together with a comprehensive maintenance procedure in place, any planning applications which will extend the existing pipeline infrastructure should be suspended.

Further, THS is concerned that there is a risk that the local authorities may cause a breach of residents human rights if they agree any such material increases in demand for clean water in the knowledge that, at present, the supplier cannot always meet such demand.

2. AONB/AGLV land requirements & Local Governance

It is surprising that in any pre-planning application meetings between the developer and WBC planning officials the subject of protected land did not emerge or was not sufficiently discussed to discourage any further consideration of development on this site.

Several factors are relevant here not least of which is Policy RE3 under the WBC Local Plan Pt 1 that contains a refusal to consider land for development unless exceptional circumstances exist as stated in NPPF 172. The submitted information does not provide details of the exceptional circumstances required to justify the proposed development of this land which has the highest degree of protection. This is a fundamental requirement.

The proposed Red Court development directly contravenes Secretary of State Jenrick's White Paper on Housing Reform, which specifically rules out development on any AONB land, and the robust WBC policy that any land with an AGLV designation must be treated in the same way as an AONB designation.

It is clear that the proposed development is outside of the settlement boundary as defined by the Neighbourhood Plan (NP). This was in accordance with the latest Town Council decision to define the Settlement Boundary between urban and rural as Scotland Lane to formalise the LPP1 description / designation.

With regard to LPP2, as this has yet to be formally consulted upon and ratified, and the potential availability of additional brown field sites within the settlement boundary, it may be judged premature to approve any new developments until such time as the LPP2 and the NP consultation processes have been formally completed.

Finally, Councillors need to be cognisant of the fact that any development on this site, given its land designation and that it is outside of the settlement boundary, is directly contrary to the majority of views expressed by local residents during the NP consultation about retaining the green spaces surrounding the town. It will also undermine the work of Haslemere Vision and associated Councillors since its inception.

3. Highway issues

Any large development will undoubtedly generate additional traffic but in this case the main access and egress to the site necessitates navigating the narrow and parking-congested Scotland Lane to access the A286 or the narrow, busy and fast B2131 Petworth Road.

Vehicular access to both the A286 and B2131 are on very difficult junctions so it is surprising to note that no mention of improving either junction layout or other traffic calming measures are included within the planning application supporting documents.

Residents of Red Court wishing to access the town centre and railway station will inevitably choose to drive along Old Haslemere Road, then down either College Hill

or Museum Hill, putting intolerable pressure, and hazard for pedestrians, on roads which are narrow, largely single track due to lines of parked cars, and lacking a pavement.

In addition to new vehicle movements derived from new residents, the vehicular movement analysis does not appear to include expected additional vehicular movements from delivery vehicles, many much larger than cars, as a result of the on-line shopping mechanisms and routines adopted by many residents. Such additional delivery vehicle congestion should not be underestimated on the local road network.

4. Sustainable transport

The developer makes much of compliance with NPPF Feb 2019, para 72 stating the site is within walking distance of local shops and services, access to the rail network is within a 1km walking distance and the site is close to bus stops.

Such statements are misleading as is the map indicating that the town centre is within a 10 minute walk. As any Haslemere resident and Councillor knows, that is simply not the case from that site.

Further, suggestions that the town centre and amenities are within walking and cycling distances thereby promoting sustainable transport methods are equally inappropriate.

Such comments fail to mention the high altitude of the site with steep, narrow and winding roads leading to it. Walking one way to the town may be feasible, but not within the time frame of 10 minutes as indicated in the submitted documents. The return journey involving a climb of over 200 feet laden with shopping or returning from a rail commute by foot is unlikely to be a feasible option.

For walking or cycling, the busy, fast and narrow B2131 , the busy and fast A286 and the smaller road networks will all need to be negotiated. All are poorly lit at night and have limited or no pavements.

The statement of facilitating sustainable transport methods for the site is simply not feasible and the related statements in the supporting information in the planning application are very misleading as the steep roads leading to the site will almost certainly mean that car transport remains the most viable transport choice.

5. Surface water drainage

A sustainable drainage system (SUDS) requires surface water that drains off hard surfaces and cannot percolate into the ground to be collected and discharged into the ground at specific locations instead of running off into a drainage /river system and out to sea.

As many local residents are aware, there are numerous flooding issues in the surrounding area of the site, namely Scotland Lane and Bell Vale Lane, and it is critical that the proposed Red Court development does not further exacerbate the difficulties caused by localised flooding to residents there.

At Red Court there are below ground conditions not suitable for normal soakaways located at each house due to the particularly fine sand being washed into the many fissures in the sandstone and potentially causing local building subsidence. Also, where there are clay deposits percolation through this impermeable medium is not possible.

Our concerns are not alleviated by the fact that the Sustainable Drainage System (SUD) attenuation basin, swale and below ground storage tanks are all situated above a steep 1 in 4 gradient adjacent to Scotland Lane.

Therefore, THS recommends that an expert and objective Geotechnical assessment of the site is conducted to assess whether the stability of the embankment is acceptable from an environmental and safety perspective before considering further the merits of the planning application.

If the drainage system proves acceptable then any permissions granted should include a schedule of regular inspection and maintenance of the SUDS surface water drainage system to ensure continued proper function and to protect the ground water aquifer as comprehensively detailed and recommended in the submitted expert report.

Further Observations:

It is clear that Haslemere is a very popular location in which to live and the town needs to create new homes to maintain its vitality and to support the development of affordable homes for those working in or close to it.

However, there is already significant pressure on local services and amenities from the current population. For example, local GP surgeries are dealing with c. 5000 patients against a national average of just 3,000 and commuter and shoppers car parking are already at saturation point.

To comply with Appendix D4 of the HMG Statement of Community Development, Jan 2010 any development of 10 or more dwellings should be the subject of a Public Consultation. We do not consider the invitation to "walk around" the site as offered in May 2019 or the brief presentation at the Wey Centre, which was not always attended in person by site representatives, to constitute the formal and correct consultation process.

However, it is worth noting the 'walkaround' event generated 168 objections out of 190 attendees (88% negative) which is indicative of the strength of feeling against the development of which Councillors should be particularly aware.

Summary:

THS strongly objects to the proposal to develop land for housing at Red Court for the following primary reasons:

1. Unstable water supply

The town has recently experienced severe disruptions to its water supply because of poor infrastructure and expanding demand through population

increase and climate change. It is inconceivable that any local authority that had given serious thought to the issue would consider any plans to expand demand on the precious but unstable supply of clean water to its citizens who are subject to a monopoly supplier in this area.

The recommendation of THS is that the Town Council and WBC reach agreement that Haslemere is no longer subject to the provisions of LPP2 as regards increasing the provision of dwellings until such time as Thames Water can provide solid evidence, which is to be independently verified, that they have the resources and available investment to upgrade the supply of water to the town and provide a timetable to do so within the next few years. Then, and only then, should any material housing developments be considered.

2. AONB/AGLV land & Governance issues

The proposed Red Court development directly contravenes Secretary of State Jenrick's White Paper on Housing Reform and strict WBC policies on development of designated land; the LPP2 and the NP consultation processes have yet to be completed and the potential availability of additional brown field sites within the settlement boundary may mean that any material planning application decisions are judged to be premature.

3. Highways & Sustainable transport

The main access and egress to the site necessitates navigating the narrow and parking-congested Scotland Lane to access the A286 or the narrow, busy and fast B2131 Petworth Road.

Residents of Red Court wishing to access the town centre and railway station will inevitably choose to drive along the smaller local road network which are narrow, largely single track due to lines of parked cars, and lack pavements.

The Haslemere Society
Planning Group

September 2020