



21 Stroatley Rise  
Haslemere  
Surrey  
GU27 1AG

16<sup>th</sup> September 2020

Members of Waverley Borough Council Planning Committee

Dear Councillors,

**Planning Application WA/2020/1213 – Red Court**

The Haslemere Society (THS) wishes to strongly object to the planning application.

**Material issues to be considered in the planning decision:**

**1. 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 AONB and AGLV 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.

## **2. 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 or other sources 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 place further demands on 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. To illustrate this point, there have been two occasions so far this year where Thames water have distributed 'Protect your Water Supply' emails to local residents because of the pressure on supply.

## **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 is 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 local 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**

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 be 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:**

We have deliberately not made comment on the various negative issues having an impact on many of the trees on the site many of which will need to be felled to facilitate construction and the significant negative impacts on the biodiversity of the site. This is because we are aware that others, who are more qualified in these subjects, will be making separate comments on this aspect.

The applicant asserts that the development will deliver a net biodiversity gain of 10% over the site. Despite a request for further information from a member of Haslemere Town Council no more information has been provided and we have been credibly informed that there is insufficient material within the application for this assertion to be verified or assessed.

Furthermore, the information available covers only the site of the development itself, not any of the surrounding area. A wider assessment is needed in respect of some protected species such as some types of bats and dormice. On the face of it therefore, the application cannot be said to demonstrate that the application meets the NPPF requirement to provide a net biodiversity gain. Given the position and size of the site, this is a critical issue. There is no good reason why the information on which the applicant's ecologist has based his assessment cannot be made available for wider review and the application should not be decided until and unless such detail is provided."

There is already significant pressure on local services and amenities from the current population. For example, local GP surgeries, commuter and shopper's car parking are already at saturation point. Any material application like this should be paired with an agreed timetable for expansion of the amenities and facilities currently under material pressure to ensure the quality of life within the town can be maintained in the future.

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.

Chris Harrison,  
Chairman,  
The Haslemere Society