

OBJECTION STATEMENT

Waverley Local Plan Part 2

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Residents
Association



Contents

	Page
1. Executive Summary	2
2. Introduction	8
3. Soundness - Site Context	10
4. The Proposed Development Site DS06	13
5. Soundness - Material Considerations	14
6. Soundness – Justification in Terms of Balance	22
7. Duty to Cooperate - Community Involvement	23
8. Conclusion	26

1. Executive Summary

- 1.1. On behalf of its members who are local residents, this document sets out comments and response by way of objection to Waverley Borough Council's draft Local Plan Part 2 ("LPP2") By way of summary, the following are the main reasons why the draft LPP2 submitted to consultation should be rejected on the grounds, among others, that it fails to comply with law and is not sound, and because Waverley Borough Council ("Waverley") has breached its duty to cooperate.
- 1.2. HSRA confirms its desire and intent to be represented at the public hearing of the Planning Inspector's enquiry into LPP2 in due course.

Legal non-compliance and Non-soundness: contrary to national and local planning policies and planning regulations

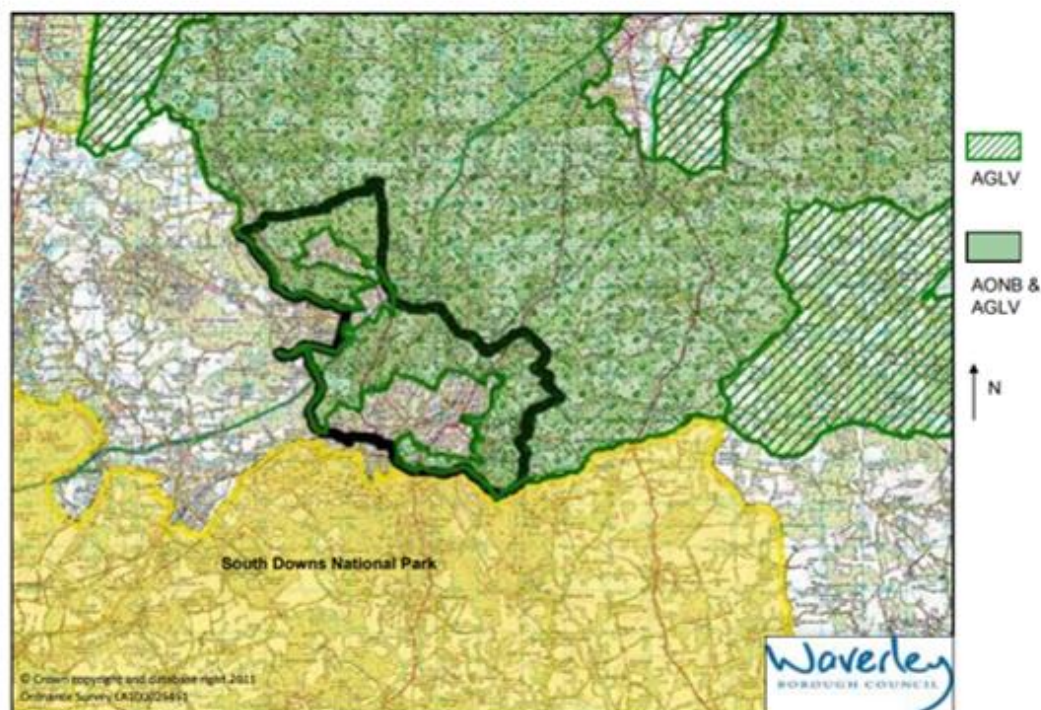
- 1.3. Local Plan Part 1 policy RE1 states that the intrinsic character and beauty of the countryside will be recognised and safeguarded in accordance with the national planning policies as set out in the NPPF. The Borough's proposed inclusion of development site DS06 for 50 dwellings in LPP2 is contrary to this policy because the immediate and irrevocable effect of building at this scale on the protected land is that the "intrinsic character and beauty" of the countryside in this and the surrounding area will be ruined.
- 1.4. LPP1 policy RE3 requires AGLV to be treated as AONB which means paragraph 172 of the National Planning Policy Framework ("NPPF") applies. This requires "exceptional circumstances" to build on such protected land. The Borough argues in commentary on LPP2 (including the Report to Executive Committee dated 6th October 2020) that the town's need for housing justifies DS06 and dismisses Local Plan Part 1 policy RE3. This is not an acceptable argument on the part of the Borough as RE3 is current policy.
- 1.5. It has been confirmed in the High Court¹ that pressure of housing numbers is not an "exceptional circumstance" for the purposes of evaluating whether or not to permit development on AONB. This position applies equally to AGLV in Waverley, by applying policy RE3 in LPP1 referred to above.
- 1.6. In any event, this site is not actually needed by the town in order to meet its housing needs quota. More than the 50 homes (including flats and affordable homes) allocated at DS06 can be provided inside the town's settlement boundary or on confirmed available brownfield sites including the Royal School site near the A3 at Hindhead. Furthermore, the relaxation of government planning rules will directly increase windfall numbers as well. This position is consistent with our community's emerging Neighbourhood Plan.
- 1.7. Even if it was accepted that greenfield AGLV or AONB should be allocated for development in Haslemere (which is not agreed by HSRA, Haslemere Vision or Haslemere Town Council), the decision to allocate DS06 in preference to less damaging sites in terms of landscape and biodiversity is not justified. For example, exclusion of sites previously included in earlier drafts of LPP2 (e.g. DS11 and DS13) was not justified on the evidence in the Borough's assessments.

¹ http://www.haslemeresouth.com/uploads/1/2/3/4/123454899/high_court_longdene_house_2019.pdf

- 1.8. It should be noted that the Borough itself only accords “minor beneficial effects” to the allocation of 50 homes at DS06 in terms of providing availability to mixed housing in Waverley – see Section 1.7.32 of Appendix D of the Sustainability Assessment (item #10). These minor beneficial effects from housing availability in no way outweigh the major adverse effects on multiple dimensions of development at DS06 as explained in this document and elsewhere.
- 1.9. Indeed, the Borough’s own assessment of DS06 as a site is summarised as being a site with no major beneficial effect and only adverse effects (some major and some moderate) – see the overview conclusion at the end of Section 1.7.32 in Appendix D of the Sustainability Assessment. Not only is the Borough’s Sustainability Assessment flawed in terms of its conclusions, but even with an adverse overall finding, the Borough has ignored its own Sustainability Assessment or chosen to interpret “moderate adverse” as being justified against no significant benefits. In either case, LPP2 does not comply legally in terms of being based upon a satisfactory Sustainability Assessment.
- 1.10. LPP2 does not demonstrate that the development is in the public interest and the strength of public opposition indicates that it is not considered by the community as being in the public interest. The strength of public opposition to the proposed development of this site has been clearly demonstrated by the 537 objections that have been submitted against the current planning application by a developer on the land at DS06, as well as the consultation stages on the Local Plan. The development is therefore not considered to be in the community or public interest.
- 1.11. LPP2 is not compliant with WBC’s policy RE3 and its consequential application of national planning policy at paragraphs 170 and 172 of the NPPF.
- 1.12. LPP2 provides an inadequate justification for a settlement boundary move in South Haslemere. The Settlement Boundary line should be, as stated by Waverley policy, as a boundary between urban & rural to following a local and logical boundary, in this case Scotland Lane. This has not been respected in the draft LPP2 which moves the boundary to accommodate DS06.
- 1.13. By virtue of the above, the proposed allocation of site DS06 in LPP2 is entirely contrary to all relevant national and local planning policies. LPP2 is therefore neither compliant nor sound.

Legal non-compliance: Waverley’s Sustainability Assessment

- 1.14. Reference is made to the items above where the Sustainability Assessment’s deficiencies are highlighted. Waverley’s Sustainability Assessment (Appendix D, Section 1.7) fails to satisfy the requirement that LPP2, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.15. Development on DS06 would swallow up swathes of Haslemere’s surrounding countryside (see figure 1 overleaf) and damages its intrinsic character and beauty. It would erode Haslemere’s unique and protected landscape, character and feel. It would have both a direct and a cumulative detrimental effect on the natural environment, causing an urbanisation ‘coalescence’ effect.



Haslemere is sandwiched between protected areas of the South Downs National Park and an area which is designated both as an 'Area of Outstanding Natural Beauty' and an 'Area of Great Landscape Value'

Figure 1 – Haslemere's surrounding countryside

- 1.16. Development on DS06 will also destroy the setting of the AONB and the South Downs National Park that border the site.
- 1.17. The Borough seeks to divert attention from these impacts by pointing to retention of some of the green space. However, the landscape and environmental value of a parcel of green space surrounded by large houses is not the same as its value as part of a coherent landscape along the southern ridge of Haslemere which is AGLV and AONB.
- 1.18. LPP2 is not compliant with national planning policy at paragraph 174 of the NPPF.
- 1.19. Development on DS06 would destroy a rich and diverse ecological habitat. Many protected species, including migratory birds, will be displaced by the proposed development. There will be deliberate harm to biodiversity with knock-on impacts for wider ecosystems, which cannot be compensated for. The council's climate emergency pledge is to act to protect the environment.
- 1.20. LPP2 does not provide evidence to demonstrate a development of 50 homes at DS06 would be adequately mitigated in terms of net biodiversity.
- 1.21. Indeed, again, the Borough's Sustainability Assessment is woefully inadequate in terms of addressing the risk to biodiversity loss of development at DS06. In Section 1.7.32 of Appendix D of the Sustainability Assessment, the first item dealing with biodiversity and geology is limited to an assessment of woodland and even that downplays the impact on Ancient

Woodland given it is just 0.02km (20m) from DS06. A satisfactory assessment of biodiversity goes far beyond an assessment of woodland.

- 1.22. LPP2 is not compliant with national planning policy at paragraphs 172, 175 & 180 of the NPPF.
- 1.23. At Section 1.7.32 of Appendix D of the Sustainability Assessment, the Borough concludes that a development at DS06 would have a “beneficial” effect in terms of promoting climate change mitigation. This is blatantly false, given that the development will destroy a large space of green fields and woodland, which thereby and inherently accelerates rather than mitigates climate change!
- 1.24. Similarly, at Section 1.7.32 of Appendix D of the Sustainability Assessment, the Borough concludes that a development at DS06 would only have a “Moderate Adverse” effect on protecting the character and quality of Waverley’s landscape, whereas the adverse effect would be major, as explained in this document, and not capable of adequate mitigation by superficial planting of screening.
- 1.25. From the above it is clear that LPP2 does not achieve critical environmental objectives and from the Sustainability Assessment it is obvious that DS06 has not been properly judged in terms of its detrimental impact when compared to viable alternatives.
- 1.26. Furthermore, LPP2 is simply unsound in that it is not justified as an appropriate strategy, because it does not take into account the reasonable alternatives and is not based on proportionate evidence.

Places unsustainable pressure on the town’s Water Supply

- 1.27. The town has suffered water shortages in recent months and years. An additional large housing estate will make this worse and Thames Water’s response to the suggestion of a development at DS06 does not give the necessary confidence that provision will be adequate and deliverable.

Creates permanent Safety Risks & Congestion on the Transport Network

- 1.28. Pedestrians flowing onto narrow lanes and more cars from a possible large development at DS06 and other developments in the vicinity will increase risk to safety for all. Furthermore, the topography of the site location creates irremediable barriers to any purported facility for sustainable transport to and from any such proposed development.
- 1.29. In this context, the Borough’s submitted data in support of LPP2 regarding walking times to the town centre is unreliable and as a desktop exercise is not supported by the on-site empirical reality; it is simply not a safe assumption that walking to and from the DS06 site/town facilities will significantly reduce car use.
- 1.30. It is noted that both the Town Council and Surrey County Council Highways department have raised grave concerns as regards the highways and traffic implications of development at DS06. Solutions to such concerns merely run into additional issues as regards the landscape and safety impacts they would present.
- 1.31. LPP2 is inconsistent and not compliant with national planning policy at paragraph 102 of the NPPF.

Breach of duty to cooperate

- 1.32. Any development on DS06 is not compliant with Haslemere's current Design Statement and furthermore the draft LPP2 has the effect of dismissing our community's emerging Neighbourhood Plan which prioritises protection of countryside against development and has been approved by the Town Council after years of effort and Haslemere-wide consultation. 89% of surveyed residents did not want large developments on this category of greenfield land.²
- 1.33. The Borough maintains that its stakeholder and public consultation has been extensive, whereas it has been limited and confusing. There is confusion in the supporting documents to LPP2 as regards whether materials relate to development within the perimeter of proposed DS06 or to a larger scheme.
- 1.34. The Borough's duty to cooperate goes beyond administrative steps and must also include listening to, and taking account of, relevant authorities and, in our view, the local citizens. The community, through its Haslemere Vision project team and Haslemere Town Council, has undertaken significant work on development planning both in the Haslemere Design Statement³ and the emerging Neighbourhood Plan, over a number of years. It is incumbent on the Borough to properly engage with and take account of the Town Council's views and output.
- 1.35. The Mayor's introduction to the 2020 draft Neighbourhood Plan states:
- In 2011 the Localism Act gave communities the opportunity to have a greater influence on the planning decisions for their area by writing a Neighbourhood Plan. In 2012, a group of local volunteers proposed that a Neighbourhood Plan ("the Plan") should be prepared for the area within the Haslemere Town Council Boundary. The Town Council supported this and, in April 2013, a volunteer led organisation called Haslemere Vision was launched with the aim of preparing a plan that will help to deliver the long term goals of a balanced and vibrant neighbourhood.*
- Since then more than 80 volunteers have given thousands of hours of time and expertise organising public meetings, online surveys and two paper consultations delivered to over 7,000 households, to seek the views of local residents and other stakeholders, groups and businesses who share an interest in our area. Those involved in developing the Plan have listened carefully to the consultation responses to ensure that the Plan reflects the views of the community.*
- Perhaps the defining joy of life in Haslemere is the ease of access to the beauty of the National Trust and otherwise designated countryside that, almost completely, surrounds it, in places reaching almost to the town centre. Haslemere Vision surveys indicated an almost universal desire to protect and cherish this.*
- 1.36. It is clear that in terms of consultation, the town's consultations have been an order of magnitude more extensive than those undertaken and relied upon by the Borough.
- 1.37. LPP2 is not compliant with paragraph 50 of the National Planning Policy Framework (NPPF).

² Haslemere Vision Evidence Base (www.haslemerevision.org.uk/wp-content/uploads/Evidence-Base-2013-20131030.pdf)

Consultation Results Phase 1 and Phase 2 (www.haslemerevision.org.uk/downloads/evidence)

³ Haslemere Design Statement 2012

(www.waverley.gov.uk/downloads/download/1278/haslemere_design_statement)

Objection Statement

Waverley Local Plan Part 2



- 1.38. Insofar as LPP2 incorporates DS06 and a Settlement Boundary move to encircle DS06, LPP2 is in direct contradiction with the emerging Neighbourhood Plan and the wishes of the community. This fact demonstrates Waverley's failure in its duty to cooperate with the relevant authority, namely Haslemere Town Council.
- 1.39. Furthermore, the existence of significant numbers of objections and concerns with respect to a specific planning application submitted for a 50 home development on the land at DS06 should be taken into account by Waverley within its duty to cooperate. Note that there were objections from (a) 537 local residents in 2020; (b) 160 local residents in May 2019; (c) CPRE; (d) Natural England; (e) Blackdown & Hindhead association; (f) Haslemere Town Council; (g) Haslemere Society; (h) Haslemere Vision; (i) Haslemere South Residents Association, among others. Concerns were raised from SDNP & Forestry Commission (Non-Statutory) re Ancient Woodland; SCC highways; and Thames Water.

2. Introduction

- 2.1. Haslemere South Residents Association (HSRA) comprises approximately 300 members whose families and households number over 500 residents of Haslemere.
- 2.2. HSRA is established by its constitutional documents "for the public benefit in the area (*Area of Benefit*) comprising the residential, recreational and rural places extending to the southern and eastern side of Haslemere" and under its constitution its purposes are:
 - 2.2.1. to promote high standards of development, conservation, planning, traffic management, safety in or affecting the Area of Benefit;
 - 2.2.2. to enhance and protect the community interests of those resident in the Area of Benefit;
 - 2.2.3. to enhance and protect the community interests of those community, educational and sport and leisure organisations and associations utilising or enjoying the Area of Benefit; and
 - 2.2.4. to represent the views of its members on local neighbourhood and environment matters generally.
- 2.3. HSRA supports appropriate development within Haslemere and is generally aligned with the views of Haslemere Town Council, Haslemere Vision and Haslemere Society regarding LPP2.
- 2.4. In addition, HSRA endorses the current Haslemere Design Statement.
- 2.5. The preparation of LPP2 comes at a time when climate considerations are paramount. Both Haslemere Town Council and Waverley Borough Council have passed climate emergency resolutions. The protection of the environment, flora and fauna, ecological networks and woodland is of local, district, national and global significance. Never before have these considerations been more material.
- 2.6. In its August 2020 White Paper, the government has emphasised the importance of benefits from the last 10 years of reform in planning policy and processes:
 - 2.6.1. "protections for environmental and heritage assets [...] continue to protect our treasured countryside and historic places; and
 - 2.6.2. we have democratised and localised the planning process by abolishing the top-down regional strategies and unelected regional planning bodies, and empowered communities to prepare a plan for their area, through our introduction of neighbourhood planning".
- 2.7. The White Paper then sets out its wishes that planning decisions:
 - 2.7.1. "promote the stewardship and improvement of our precious countryside and environment, ensuring important natural assets are preserved, the development potential of brownfield land is maximised, that we support net gains for biodiversity and the wider environment and actively address the challenges of climate change; and
 - 2.7.2. create a virtuous circle of prosperity in our villages, towns and cities, supporting their ongoing renewal and regeneration without losing their human scale, inheritance and sense of place. We need to build more homes at gentle densities

in and around town centres and high streets, on brownfield land and near existing infrastructure so that families can meet their aspirations.”⁴

- 2.8. In the context of protecting the greenbelt, AONB, local heritage and vernacular, Robert Jenrick, Secretary of State for Housing, Communities & Local Government, has stated that the government wants “to ensure that in the planning system [...] we do protect those things and the look, the feel, the character of local areas [...] like those in Surrey.”⁵
- 2.9. WBC’s adopted Local Plan Part 1 (LPP1) gives the AGLV land, on which the proposed DS06 is located, the highest applicable policy status as protected landscape equivalent to AONB (policy RE3). It is only under “exceptional circumstances” that development must be permitted and it must be in the public interest. It is not justified for LPP2 to discount this established policy.

⁴ <https://www.gov.uk/government/consultations/planning-for-the-future/planning-for-the-future>

⁵ <https://www.facebook.com/watch/?v=473319200309987>

3. Soundness - Site Context

- 3.1. The proposed development is outside the Settlement Boundary of Haslemere. It is not justified to move that Settlement Boundary out of expediency in order to include a potential development at DS06, especially if such a decision was taken in response to lobbying by a specific developer⁶ without properly assessing and evaluating all alternatives and weighing up any perceived benefits against the permanent damage and harmful impacts to the town and the environment.
- 3.2. Haslemere's character as a town is defined by its surrounding countryside, precisely the "treasured countryside" referenced in the government's recent White Paper (see above).
- 3.3. DS06 lies within the Surrey Hills Area of Great Landscape Value (AGLV) and is part of the wider wooded greensand hills landscape, south of Haslemere, which features two national landscape designations. The site is contiguous with the Surrey Hills Area of Outstanding Natural Beauty (AONB) and is 400m north of the South Downs National Park. The character of the site is entirely consistent with the AONB and makes a very positive contribution to the settings of both the AONB and Haslemere. This is reflected in:
 - 3.3.1. The location of the site within the same landscape character area as the AONB (see Surrey Landscape Character Assessment⁷);
 - 3.3.2. A recommendation by landscape consultants commissioned by Surrey County Council, that the site be included within the AONB (see Surrey Hills AONB Areas of Search);
 - 3.3.3. The site being identified as an AONB candidate piece of land in the Hankinson Duckett Landscape Character Assessment which was commissioned to inform Natural England's decision to review the boundaries of the Surrey Hills AONB; as such it was recommended for inclusion in the AONB; and
 - 3.3.4. The site's designation as AGLV.
- 3.4. The edge of Haslemere is currently defined by Scotland Lane which is immediately north of the site. This is an historic lane (first edition OS 1869-1875) with an attractive leafy character which is representative of the local area. The lane descends from a ridgeline (referred to in this Appraisal as Red Court ridge) and shares many characteristics of the rural sunken lanes found within the greensand hills. The section alongside the site is narrow, absent of footways, and has no kerb and channel. Adjacent to the site Scotland Lane is 'sunken', being at lower level than the site, and benefits greatly from the mature trees within the site, particularly those alongside the road which contribute to its overall wooded and leafy character.
- 3.5. Opposite the site, along the northern side of Scotland Lane, is a line of existing dwellings. These include Edwardian properties built in the attractive Surrey style as well as more recent properties. Most are set within mature gardens and are set back from the lane with large front gardens. The mature landscape framework within these gardens combined with the mature trees within the site creates a strong enclosing landscape edge to the settlement and one which is entirely complementary to the nearby AONB.

⁶ On the face of Redwood (South West) Limited's planning application on land at DS06, the reader is led to understand that significant discussions between the developer and Waverley took place during the preparation of his application and drafting of LPP2, giving rise to questions of due process.

⁷ Surrey Landscape Character Assessment 2015 Waverley Report (www.surreycc.gov.uk/land-planning-and-development/countryside/strategies-action-plans-and-guidance/landscape-character-assessment)

- 3.6. The Hankinson Duckett assessment mentioned above concluded this part of the AGLV appeared as an anomaly to the AONB boundary surrounding Haslemere as it is part of the same landscape and National Park landscape to the south. This contrasts with the Borough's superficial commentary that the settlement line should simply track across the AGLV, essentially for convenience to accommodate DS06.
- 3.7. The site represents a pattern of land use unchanged for at least 144 years. It features a rising contour and an extensive framework of established trees and woodland. These features enclose the site and frame Scotland Lane, and the nearby heritage assets of Red Court and Red Court Lodge (Grade II).
- 3.8. Independent landscape consultants engaged by HSRA have confirmed that the overall rising land within the site, mature trees, and the combination of woodland and small grassy fields creates an attractive landscape which is complementary to the adjacent AONB. The site makes a very positive contribution to the local landscape character. This is in direct contrast to the assertions in the LPP2 assessment that incorrectly describes coniferous plantations without due regard for the actual status of the site and its woodland and context. The high value of the site is recognised by independent experts by its designation as AGLV and its most valuable qualities which include:
- 3.8.1. The contribution of the site to the leafy character 'sunken' character of Scotland Lane;
 - 3.8.2. The contribution of the site's mature landscape framework to a strong enclosing landscape edge to the settlement;
 - 3.8.3. Providing a complementary landscape setting to heritage assets within Red Court;
 - 3.8.4. The legibility of the historic landscape pattern comprising a wood and small fields assarted from woodland; and
 - 3.8.5. A framework of established vegetation which makes a significant contribution to the wider greensand hills woodland network.
- 3.9. DS06 and the proposed move of the Settlement Boundary appear in the draft LPP2 despite WBC Policy RE3 in the adopted LPP1 requiring the site be treated as being within the AONB until Natural England has completed its boundary review, and WBC's own evidence base suggesting it should be included within the AONB designation. The fact that Natural England's review is delayed is not a basis to change WBC Policy and treat a site in AGLV as any more suited to development than a site in AONB.
- 3.10. DS06's proposed 50 dwellings could not be satisfactorily accommodated on the site without significant landscape harm. In landscape terms the site is highly unsuitable for residential development, especially when compared to available brownfield sites, as it would:
- 3.10.1. Harm the historic landscape pattern of the local area;
 - 3.10.2. Harm the existing woodland framework within the site and its contribution to the surrounding greensand hills woodland network;
 - 3.10.3. Create an illogical new settlement boundary;
 - 3.10.4. Be contrary to the Landscape Character Area's landscape strategy to enhance and conserve field boundaries, woodland and sunken rural lanes;
 - 3.10.5. Remove the site from the Hindhead Wooded Greensand Hills Landscape Character Area;
 - 3.10.6. Harm the valued AGLV landscape;

Objection Statement

Waverley Local Plan Part 2



- 3.10.7. Remove the site from being considered for inclusion in the AONB, pre-empting the outcome of Natural England's boundary review;
 - 3.10.8. Harm, in any event, the setting of the currently designated AONB, irrespective of the boundary review outcome;
 - 3.10.9. Result in tree removal and the replacement of a natural setting with a suburban one for retained trees;
 - 3.10.10. Harm the woodland setting to Red Court Lodge as experienced from Scotland Lane;
 - 3.10.11. Harm the wooded horizon and setting to Red Court as experienced from the South Downs National Park; and
 - 3.10.12. Potentially harm the integrity of a possible Saxon/ early medieval settlement (Area of High Archaeological Potential Ref. WA154).
- 3.11. The key statement in paragraph 172 of the NPPF is on giving "great weight" to "conserving and enhancing landscape and scenic beauty". The proposed scheme backs onto the South Downs National Park and access to the National Park from the town is via various routes past the proposed development. All walkers, ramblers, cyclists and visitors will want to access these areas of countryside through the green valleys which currently exist, rather than through a built-up housing development. The proposed development does not meet the "Great Weight" statement in NPPF Clause 172.

4. The Proposed Development Site DS06

- 4.1. Any development on DS06 would consist of converting precious countryside into a housing estate. As observed by Haslemere Vision and in the emerging Neighbourhood Plan, land in and around Haslemere is a scarce commodity. Accordingly, the density of housing stock on any given site needs to be appropriately high. LPP2's proposal for DS06 consists of housing at a very low density (17.6 dph) and as such represents an incredibly low return for damage to the countryside, in terms of economic and social contribution to the town or in terms of surplus contribution to housing supply.
- 4.2. To the extent that a developer of DS06 may point out that the Red Court estate at DS06 has historically been privately owned and as such not available to members of the public to access, whereas a proposed scheme could open up some areas of green space to the public, it should be noted that the results of a recent developer's consultation on the site included "a general feeling by respondents that there is not a lack of public open space and green space within Haslemere". This is manifestly the case, due to the proximity of large areas of National Trust and South Downs National Park green spaces, as well as protected green spaces across the townscape. There is therefore no meaningful benefit to the community in this aspect of development at DS06.
- 4.3. The fact that parts of the countryside are not accessible to the public is not unusual. Fields and woodlands are no less important from a landscape and environmental standpoint for the fact that there are not public rights of way across them.

Transport assessment

- 4.4. DS06 involves a single vehicular access on Scotland Lane which is combined with access for pedestrians and bicycles.
- 4.5. It is important to note that the transport and highways impacts of the proposed development have consistently been a concern from the perspective of both the public but also Haslemere Town Council (e.g. HTC concerns regarding the allocation of this site in LPP2 - July 2018; HTC objections to a planning application on the site - September 2020).
- 4.6. DS06 should not be included in LPP2 from the perspective of there being no assurance whatsoever that the highways and transport impacts have been properly assessed and satisfactorily addressed.
- 4.7. In terms of being a site that is capable of complying with NPPF paragraph 108, the impact of a development at DS06 will be to create a wholly unacceptable level of risk to safety on Scotland Lane. Not only will the increase in vehicular traffic impact existing users, whether drivers, cyclists or pedestrians, but this is exacerbated by the cumulative effect of increased traffic from developments at The Heights and Longdene House. Note that NPPF paragraph 108 states that "Development should [...] be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."
- 4.8. In addition to the impacts on Scotland Lane, at the northern section of Old Haslemere Road the verges become high banks, restricting pedestrian access to the carriageway and providing an extremely narrow highway corridor. Any proposal (in conjunction with development on land at DS06) for a 'virtual footway' by road markings on the road is impractical and would provide a dangerous false sense of security on a road whose width would not allow for a car to pass without driving across the border of the so-called 'virtual footway'. The only alternative is via historic byways which are less direct and unlikely to be used.

5. Soundness - Material Considerations

Housing numbers

- 5.1. The Borough's commentary on LPP2 relies on supposed pressure on Haslemere being able to meet its housing needs. In meeting housing needs, NPPF paragraph 118 requires great weight be given to using brownfield sites in preference to greenfield sites and the Neighbourhood Plan assumes housing numbers will be met without large development on greenfield outside the Settlement Boundary.
- 5.2. Furthermore, the draft LPP2 does not include some 60 allocatable sites with a yield of 5 or fewer dwellings. This appears to mean that in assessing future satisfaction of housing needs, far more than DS06's yield of 50 homes will be met within the town already under WBC's projections and this is before any additional brownfield sites are added as a result of Waverley's stated ongoing engagement with promoters (such as has been identified close to the A3 at Hindhead where there is a manifestly suitable, achievable and deliverable development site for up to 125 dwellings). Therefore, there is no case to permit development at DS06 or to extend the Settlement Boundary on grounds of an overriding need to increase the supply of housing by 50 dwellings during the Development Plan's period.

Design Statement

- 5.3. The Haslemere Design Statement (2012)⁸ was adopted as a material consideration in July 2012 by Waverley as planning decision-maker. Its expression of the local community's wishes should be taken account of by Waverley in fulfilling its duty to cooperate, alongside consideration of the Neighbourhood Plan.
- 5.4. Haslemere Design Statement, which is endorsed by the draft Neighbourhood Plan, includes specific guidelines to:
 - 5.4.1. Preserve the tree and hill skyline views
 - 5.4.2. Protect the local characteristic
 - 5.4.3. Enhance and extend wildlife corridors
- 5.5. Both the allocation of DS06 and the moving of the Settlement Boundary on Scotland Lane, as proposed in the draft LPP2 are inconsistent with all three guidelines which are incapable of being remedied or mitigated (any development on DS06 will not preserve the tree and hill skyline views, nor will it protect the local characteristic, nor will it enhance or extend wildlife corridors).

Neighbourhood Plan

- 5.6. Haslemere Vision surveys (see figure 2 above) indicated an almost universal desire to protect and cherish the designated countryside that, almost completely, surrounds the town (see figure 3 overleaf), in places reaching almost to the town centre.
- 5.7. The vision of the Town Council approved draft Neighbourhood Plan includes the following objectives:

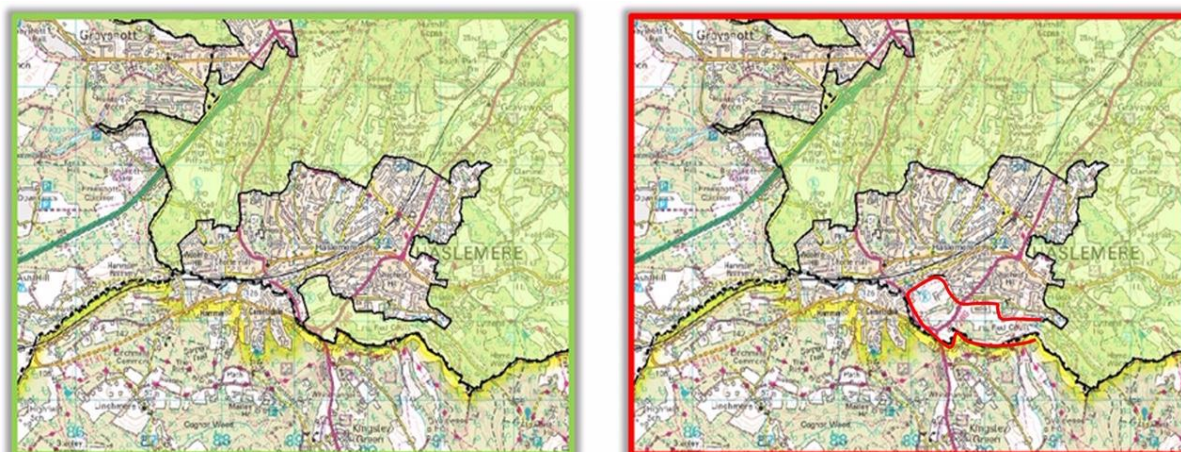
⁸ https://www.waverley.gov.uk/downloads/file/3162/haslemere_design_statement

- 5.7.1. To protect and enrich our green spaces, biodiversity and the natural environment that surrounds us
- 5.7.2. To re-balance road use, limiting the adverse impact of motor vehicles by improving provision for off street parking and/or improving facilities for alternative forms of transport

As above, these objectives cannot be satisfied nor remedied by a large development of 50 homes at DS06: the environment will not be protected or enriched and attempts to compensate or mitigate fall short of these objectives; and the topography of the location prevents any improvement being made as regards non-car modes of transport.

Coalescence

- 5.8. The cumulative effect of DS06 with previously permitted development on greenfield sites is a 'coalescence effect' which can be seen in the map comparison in figure 3. Not only is Haslemere's special ring of green space eroded significantly, but also the urbanisation growth results in merging of the townscapes between Haslemere and Camelsdale.



**Figure 3 – Before and after threatened developments at 'Scotland Park' and Sturt Farm –
Loss of AONB & AGLV land and resulting Coalescence**

- 5.9. The cumulative loss would amount to some 175ha.
- 5.10. The Borough has not taken into account or addressed the cumulative effect of this development with others in the same geographical area in its allocation of DS06. This is not in compliance with NPPF paragraph 180:

180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

Wildlife and biodiversity

- 5.11. The land at DS06 provides a haven for wildlife and has a very diverse population of animals. It also provides a vital corridor for the wildlife as well as a recognised stop-over for birds in

- the Wealden Heath Spa II area. Any development at DS06 would displace wildlife and therefore does not comply with LPP1 policy and NPPF paragraph 172 as great weight should be given to conserving the biodiversity of our countryside.
- 5.12. According to NPPF policy, planning policies should contribute to and enhance the natural and local environment by establishing coherent ecological networks. Consideration must include an assessment of the detrimental effect on the environment.
- 5.13. Any large development on DS06 would contravene NPPF paragraph 174 as it would not safeguard the existing wildlife corridors and stepping stones. Linked to this is the Climate Change emergency declared by each of Haslemere Town Council and Waverley in 2019. Haslemere Town Council declared in tandem, a Biodiversity emergency. Development at DS06 would undermine and contradict the councils' policies in this respect.
- 5.14. The Sustainability Assessment is deficient in its failure to include any valid assessment of the biodiversity risk of development at DS06.
- 5.15. DS06 is not commensurate with a recent national pledge to safeguard biodiversity and Waverley's policy declaration on Climate Emergency.
- 5.15.1. The UK has failed to achieve commitments to reverse biodiversity decline (failing to achieve 14 out of 20 targets for 2020, in particular the key biodiversity targets related to species and habitat protection). This biodiversity decline fundamentally threatens the livelihoods and health of its citizens; for example Prime Minister Boris Johnson stated: "We must act now – right now. We cannot afford to dither and delay because biodiversity loss is happening today and it is happening at a frightening rate. Left unchecked, the consequences will be catastrophic for us all. Extinction is forever – so our action must be immediate."
- 5.15.2. The UK is also suffering from increasing health problems in terms of mental health and obesity, which Defra reports have shown can be addressed through improved access to biodiverse greenspace.
- 5.15.3. Our national policy response is a 25 Year Environment Plan with the pledge to leave the environment in a better state than we found it. In September 2020, Boris Johnson also committed the UK to the Leaders Pledge for Nature which recognises a 'state of planetary emergency', highlighting how "Nature fundamentally underpins human health, wellbeing and prosperity and how a transformative change is needed: we cannot simply carry on as before."
- 5.15.4. The Prime Minister announced that 30% of the UK's land will be protected for nature by 2030, meaning an extra 400,000 hectares will be conserved.
- 5.15.5. The local policy response for Waverley has been to declare a Climate Emergency which commits the council to regard climate change as a serious threat that requires urgent action to reduce carbon emissions and conserve biodiversity.
- 5.16. It is plain to see that the proposition of any development on AONB-candidate AGLV land at DS06 conflicts with achieving these national and local policy targets.
- 5.17. Specifically, crucial aspects of biodiversity that would be destroyed by the development include notable species (see below). The site is also likely to provide a key part of the coherent ecological network for the area, sustaining populations of priority bird species such as woodcock, nightjar, redwing, hen harrier, woodlark. Fragmentation of habitats is a primary driver of UK biodiversity loss.
- 5.18. Tom Oliver, Professor of Applied Ecology at University of Reading, Senior fellow on Defra Systems Research programme and member of European Environment Agency Scientific Committee, has stated that DS06 "forms part of a woodland network including adjacent ancient woodland with very high biodiversity. At the larger scale, this site is within a 10km

square which is particularly high in species richness for the large UK environmental zone defined as 'lowland calcareous hills/variable lowlands, S. England', scoring 0.82 for ecological status based on analysis of over 4000 species. It is also directly adjacent (less than 1km away) to one of the most highly biodiverse 10km squares for an adjacent zone of 'flat/gently undulating plains, E. Anglia/S. England'. Therefore, at the regional scale this 10km square containing Haslemere is of high biodiversity and unique importance for regional ecological networks to sustain biodiversity. Habitat loss in this site really matters to UK biodiversity at the larger scale."

- 5.19. In Professor Oliver's expert opinion, a recently submitted landscape strategy proposed by a developer of land at DS06 which suggested it could "achieve biodiversity net gain" by planting fruit trees and native trees and "a variety of ground cover and shrubs incorporated into the development particularly those which are drought resistant and low maintenance" was inadequate to protect and restore the priority species found on this site.
- 5.20. Any development for 50 homes on DS06 would conflict with the Waverley requirement that new development "should make a positive contribution to biodiversity in the Borough". Professor Oliver has stated that "the type of species on any restored land [at DS06] will likely be common suburban species and will not replace, in terms of type or diversity, the biodiversity lost. This also conflicts with Biodiversity Net Gain principles in the National Planning Policy Framework".
- 5.21. DS06 has a confirmed wealth of protected species on and around the proposed development site⁹. These include red listed species which fall into the endangered and protected category:
- Dormice
 - Badgers
 - Slow worms
 - Grass snakes
 - Multiple species of migratory and resident birds
 - Passerines, including firecrests
 - Bats, including pipistrelles, serotines and noctules, brown long-eared bats
 - Woodpeckers (including green and lesser and greater spotted)
 - Owls - long eared, barn & tawny
- 5.22. Local residents also Report:
- Hedgehogs
 - 2 family harem of Pheasants
 - Voles
 - Shrews
 - Toads
 - Green snakes
 - Sand Lizards
- 5.23. Any development for 50 homes at DS06 will have an irreversible and negative impact on important ecological networks. This means that there is a 'shadow' effect of the diminution in wildlife across the surrounding area. For example, the imminent introduction of beavers by the National Trust into the valley which extends from Chase Farm across the south of the Red Court estate, will be impacted by any such development. The valley is home to a wide

⁹ Engain Report, available to Waverley in the context of a developer's 2020 planning application on the land at DS06.

range of wildlife and is part of a system of unspoilt damp clay valleys, steep wooded hillsides and dry heathy hilltops.

- 5.24. As noted by the President of Haslemere Natural History Society, "The beavers will become part of a rich mammal fauna that includes an extraordinary range of bats, the well-documented dormice and badgers, plus others including field voles and roe deer. These use and depend on a range of integrated habitats in the landscape that support other components of biodiversity, especially a wealth of insects and plants. The proposed development [at DS06] will not only destroy habitat at [DS06] Red Court, it will cast a shadow beyond."
- 5.25. In relation to the feasibility for a developer of DS06 to mitigate the threat to the bat population at the site, the presence of specific and rare bat species in the surroundings of Haslemere and on the proposed site (eight bat species have been identified in the neighbouring National Trust property) means that the mitigation is unlikely to help any but the most common bats.
- 5.26. Bat experts explain how it is common practice for developers to make a point of installing bat boxes in the properties. These might possibly attract more of our most common pipistrelle and long-eared species which are already plentiful in the area. However, it would be at the expense of rarer species which are dependent on the habitat which would be destroyed. Mitigation measures undertaken where other developments have gone ahead very rarely prove successful. There are probably over 3 million pipistrelles and a quarter of a million long-eared bats in Britain, compared with just a few thousand Bechstein's and barbastelles, so the purported mitigation proposals are damaging in themselves to the rarer species.
- 5.27. Bat species confirmed on the National Trust land adjoining DS06 are:
- Common pipistrelle
 - Soprano pipistrelle,
 - Brown long-eared
 - Natterer's
 - Daubenton's,
 - Serotine,
 - Noctule and whiskered bats. (The latter is a cryptic species, easily confused with two other small woodland bats, so it is possible that these too are present.)
- 5.28. Bat species confirmed within a relatively short distance across the ecological network and corridor at Imbhams Farm include Barbastelle, Nathusius' pipistrelle, and breeding colonies of Bechstein's and Alcahoie bats. The woodland around DS06 is similarly a likely habitat for these species.
- 5.29. In summary, there will be a substantial net biodiversity loss from this development on AONB and AONB-candidate AGLV land, which conflicts with both local and national policy targets.

Wealden Heaths II SPA 5km Zone

- 5.30. DS06 is within the Wealden Heaths II Special Protection Area 5km Zone. This area is designated because it provides a habitat for the important bird species of woodlark (BoCC4 green list and Red list for birds 2015, protected in the UK under the 2008 Wildlife and Countryside act), Dartford warbler (a species of international conservation concern – listed as near threatened on the on Global IUCN Red list, protected in the UK under the Wildlife and Countryside Act 2008), nightjar (BoCC4 Amber listed protected species and Red list for birds 2015), nightingale (BoCC4 Red list protected species) smooth snakes (protected in the UK under the 2008 Wildlife and Countryside act, Priority Species under the UK Post-2010 Biodiversity Framework. Listed as a European Protected Species under Annex IV of the

European Habitats Directive), cuckoo (BoCC4 red list and listed as vulnerable on global IUCN Red list of threatened species), woodpeckers (BoCC4 Red list and listed as vulnerable on global IUCN Red list of threatened species), redpoll (BoCC4 Red list and Priority Species under UK post-2010 biodiversity framework - protected in the UK under the Wildlife and Countryside Act 2008), sparrowhawk (BoCC 4 Green list and Red list for birds 2015), nesting owls - all wild birds, including eggs and nests, are protected by law, as are the wintering habitats of wild birds.

- 5.31. On a regular basis local residents hear the calls of owls and see a colony of bats flying in and around the woodland at DS06 - roosting bats are classified as European Protected Species (EPS) and subject to a high degree of legal protection - their roosts are protected whether occupied or not. Waverley's own policy states that residential development should be avoided in these areas.

Traffic and road safety

- 5.32. Residents south of Haslemere High Street are concerned at the cumulative effect on traffic from DS06 with other developments taking place. Narrow and steep lanes with no pavements pose real risk to safety.
- 5.33. DS06 is not accessible on foot by pavements or dedicated paths, to either the station or the High Street. It is necessary to walk in the road and the roads are not sufficiently wide to accommodate 'virtual pavements' created with road markings.
- 5.34. The time and physical exertion needed to walk to the town centre is far greater than has been suggested by a developer, and even more so if carrying shopping or with children. The consequence is that residents in any proposed development at DS06 will not walk to local facilities and shops other than by exception. This fact is not properly represented in the Sustainability Assessment.
- 5.35. Furthermore, the allocation of DS06 takes no account of seasonal variation in road and pathway conditions in this context. In winter, the steep inclines on Scotland Lane, Old Haslemere Road, Museum Hill and College Hill become treacherous for cars, bicycles and pedestrians, as can be seen in figure 4 overleaf.



Figure 4 – Winter conditions as witnessed on social media in real time

- 5.36. It is noted that Surrey County Council Highways department requested a delay in consideration of a planning application on the land at DS06 pending further work being done to ascertain the transport and highways implications of the proposed development and the extent to which concerns can be allayed, if at all.

Flood risk

- 5.37. It was noted in the Atkins Environmental Report commissioned by Waverley that the area of DS06 is classified as Amber & Red for flooding, so building on this raised area will cause excessive run-off in normal winter rain fall conditions.
- 5.38. The regular flooding at the junction of the Midhurst Road and Scotland Lane will become even more frequent and disruptive and dangerous for road-users and pedestrians, if a development at DS06 were to occur.

Heritage

- 5.39. Red Court is grade 2 listed as is the Lodge building. Separate listings. In the immediate vicinity of Red Court there are 7 other separately listed grade 2 buildings:
- Lowder Mill House
 - Lowder Mill Building
 - Valewood Farmhouse
 - Stedlands Farm House
 - Houndless Water
 - Broad Dene
 - Shepherds Down
- 5.40. It is of key importance that changes created to the settings of all these listed buildings, including Red Court itself, be recognised as an irremediable harm caused by a large development at DS06 and moving the Settlement Boundary. The setting is held to the same precious status as each building itself and the setting is comprised of the cluster of buildings and not just each one in isolation.
- 5.41. With respect to both Red Court and its Lodge, the AGLV on which the development is proposed historically forms a critical part of the setting of both buildings.

Dark skies

- 5.42. DS06 is adjacent to the IDA Dark Sky. Any development of the size contemplated in LPP2 will add significant light pollution especially as it is raised on the hillside as a gateway to the National Park.
- 5.43. The High Weald's dark skies are some of the darkest skies in the South East. Sky Quality Meter (SQM) readings taken around nearby Wadhurst indicate skies as dark as 21.09 mags/arcsec² – a figure that corresponds to a Silver Tier International Dark Sky Reserve, described by the International Dark Sky Association as being: "Night-time environments that have minor impacts from light pollution and other artificial light disturbance, yet still display good quality night skies and have exemplary night-time lightscapes." Building on the hillside location of DS06 will not be appropriate in the terms of NPPF paragraph 80 (c) in this respect.

6. Soundness – Justification in Terms of Balance

- 6.1. The issue which Waverley and the Planning Inspector need to balance is simple: is the allocation of DS06 for proposed development worth it? This is in terms of any economic, social and environmental benefit when weighed against the loss and damage to the environment, landscape and wildlife.
- 6.2. With respect to any weight to be given to economic advantage from building on DS06 for the town, this is negligible as any likely plan (including the one proposed by the developer who has submitted a planning application in 2020) will not generate or develop any significant business to support residents at a development built at DS06. Furthermore, Waverley's Sustainability Assessment assesses DS06 as creating a "minor adverse" impact on Waverley's objective to promote economic vitality.
- 6.3. In the context where it is more likely than not that Haslemere's housing needs can be met without this development, there are no exceptional economic or social circumstances to justify allocating DS06 in LPP2 or moving the Settlement Boundary, given it is on land to be treated as AONB under Waverley's own policies and is home to precious habitats and ecological networks.
- 6.4. Finally, the allocation of the site would set a precedent for future development in this location and substantially weakens the Council's position to protect further AGLV/AONB land and similarly important habitats and ecological networks in and around Haslemere.

7. Duty to Cooperate - Community Involvement

- 7.1. Any development on DS06 is not compliant with Haslemere's current Design Statement and furthermore the draft LPP2 has the effect of dismissing our community's emerging Neighbourhood Plan which prioritises protection of countryside against development and has been approved by the Town Council after years of effort and Haslemere-wide consultation. 89% of surveyed residents did not want large developments on this category of greenfield land.¹⁰
- 7.2. This point is all the more important given that Waverley made changes in settlement boundaries and allocations of sites in the preparation of a pre-submission draft LPP2 document presented to the Environment Overview & Scrutiny Committee on 22 October 2018 as a direct result of representations made by local parish councils in Chiddingfold and Dockenfield. Haslemere's parish council (the Town Council) has expressed a change in its position regarding the allocation of sites, following its approval in November 2019 of a draft Neighbourhood Plan that does not move the Settlement Boundary to include DS06¹¹ (and indeed through the Town Council's recent objection to a developer's planning application on the land at DS06); therefore out of due process it is Waverley's duty to take the same account of that revised representation in finalising LPP2, as it has of other parish councils' representations.
- 7.3. Waverley has failed in its duty to cooperate with the local community in its failure to respond to repeated requests for access by HSRA to documents publicly referred to and considered in the meeting of the Environment Overview & Scrutiny Committee on 22 October 2018, in particular the landscape report constituting part of the evidence relating to Waverley's preparation of LPP2. Such action is open to criticism for not only being a failure in cooperation but also being a wilful obstruction in due process.
- 7.4. The Haslemere-wide community has continually objected to large developments on greenfield sites outside the Settlement Boundary. It is simply not appropriate to ignore the Neighbourhood Plan in the way suggested by the Borough in its commentary on LPP2.
- 7.5. In contrast to the LPP2 consultation processes run by the Borough, the town has been engaging with the community in depth and over a long time, including on the directly relevant question as to whether or not a site of protected greenfield land outside the existing Settlement Boundary should become the location of a large development such as the one proposed in LPP2. In April 2013, a volunteer led organisation called "Haslemere Vision" was launched with the aim of preparing a Neighbourhood Plan that will help to deliver the long-term goals of a balanced and vibrant neighbourhood. Since then more than 80 volunteers have given thousands of hours of time and expertise organising public meetings, online surveys and two paper consultations delivered to over 7,000 households, to seek the views of local residents and other stakeholders, groups and businesses who share an interest in the area. The output was a draft Neighbourhood Plan approved by the Town Council and supported in principle through public consultation – a Plan that reflects the views of the community.

¹⁰ Haslemere Vision Evidence Base (www.haslemerevision.org.uk/wp-content/uploads/Evidence-Base-2013-20131030.pdf)

Consultation Results Phase 1 and Phase 2 (www.haslemerevision.org.uk/downloads/evidence)

¹¹ Previously DS18 in earlier LPP2 drafts

7.6. Haslemere Vision surveys (see figure 2 below) indicated an almost universal desire to protect and cherish the designated countryside that, almost completely, surrounds the town, in places reaching almost to the town centre.

B1: Where do you believe we should build?

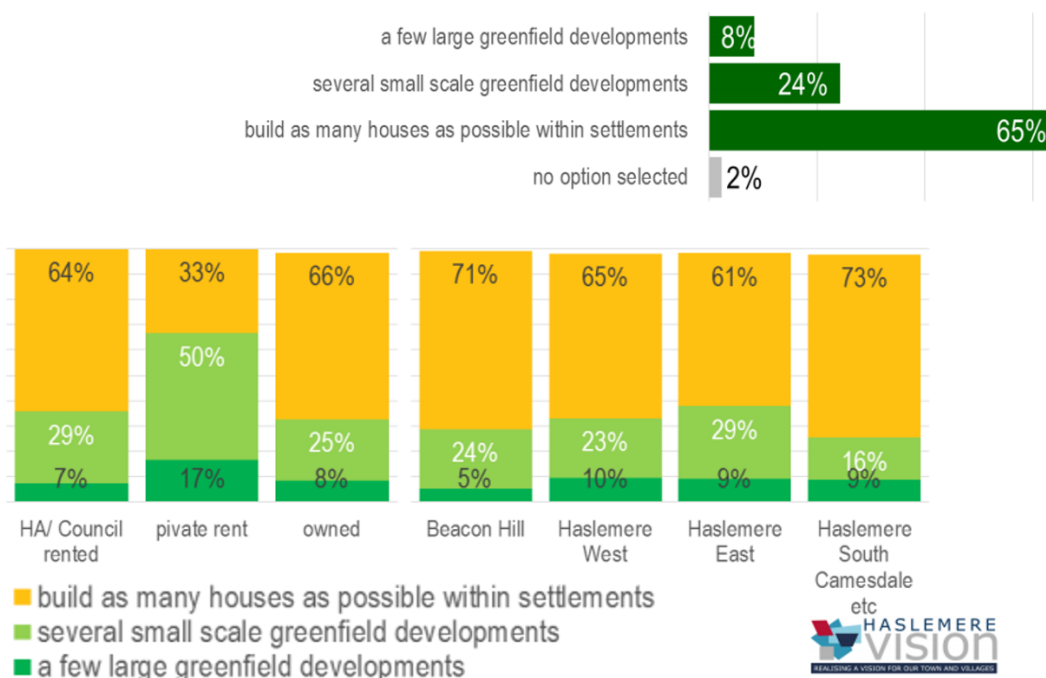


Figure 2 – Extract from Haslemere Vision Consultation Results 2016

- 7.7. Figure 2 shows the results of town-wide consultation undertaken by Haslemere Vision. Only 8% were supportive of a development in the category of a 50 home development at DS06 (i.e., a “large greenfield development”) and 89% were against. 65% were against allowing even small- scale developments building outside the settlement boundary (which, again, is the category contemplated by DS06 in LPP2).
- 7.8. The survey results also show that objections to a large development such as contemplated at DS06 in LPP2 came from residents across the town: 95% in Beacon Hill, 88-90% in Haslemere West, 90-91% in Haslemere East and 89-91% in Haslemere South and Camelsdale. Note that this disproves any misinformation that objectors to DS06 only comprise a small group of residents who do not want development in their “back yards”.
- 7.9. CPRE has publicly confirmed its opposition to large development at DS06. CPRE Waverley District chairman is quoted in Haslemere Herald 13 June 2019: "The developers of [DS06 – Red Court] claim in their literature that the proposals to build 180 houses on green fields designated as an area of great landscape value and/ or within the Surrey Hills AONB 'conform and align absolutely' with CPRE policies on access to National Parks and AONBs. Most emphatically we do not share that view."

- 7.10. Subsequently, CPRE's district Chairman had to make second corrective statement (Haslemere Herald 20th June 2019):

"CPRE SURREY would like to respond to the 'letter of apology' from Redwood (South West) Ltd regarding the proposed development on land at Red Court, Scotland Lane, in the Herald last week.

CPRE Surrey is concerned at the misuse of CPRE's submissions to the Glover review of National Parks and AONBs. The [DS06] Red Court site falls partly within the Surrey Hills Area of Outstanding Natural Beauty (AONB) and partly within the Surrey Hills Area of Great Landscape Value (AGLV). This area of AGLV has been recommended by Natural England's landscape consultants for upgrading to AONB status as part of a review of the whole of the AONB and AGLV.

The National Planning Policy Framework (NPPF) and the Local Plan provide that great weight should be given to conserving landscape and scenic beauty in, inter alia, AONBs, which have the highest status of protection in relation to landscape and scenic beauty—and that planning permission should be refused for major developments in AONBs except in exceptional circumstances, and where it can be demonstrated they are in the public interest.

The proposals for [DS06] Red Court fail these tests."

- 7.11. Several local schools have confirmed, contrary to assertions by a developer, that they do not actively support a large development at DS06. In the Haslemere Herald on 30th May 2019 a local headteacher, speaking on behalf of the Haslemere Confederation of Schools stated:

"It has been brought to the attention of the headteachers of the confederation of local Haslemere state schools that the developer of the [DS06] Scotland park/ Red Court Estate has indicated we are in support of the project. This is not the case and, in fact, the local schools made a clear decision to remain neutral regarding this project. It was also stated we have been invited to a consultation and we will be in attendance with some of our pupils and this will also not be the case".

- 7.12. Against this background any statements regarding public support for DS06 to be included in LPP2 must be reviewed with appropriate scepticism, especially where they refer to support from third parties or consultee organisations.

- 7.13. To the extent that DS06 involves a site for the potential development of 50 homes rather than 180 homes, the LPP2 supporting documents are misleading in including information related to a much larger development of some 180 or more homes. This is an indication of both the inadequate approach to consultation on allocated sites in LPP2 but also the potential inappropriateness of Waverley apparently preparing LPP2 in conjunction with a developer with vested commercial interests in DS06.

- 7.14. Notwithstanding the Borough's calls for sites in the context of LPP2 and seeking sites in Haslemere, it is not clear that the Borough has adopted a proactive cooperation approach at all times. We strongly encourage the Borough to exhaust all possible analysis and engagement with regard to both windfall analyses and brownfield sites. As regards windfall sites, it is not sufficient for Waverley to default to a methodology for windfall analysis in LPP2 simply because it was used at an early stage some years previously, since a sophisticated approach to windfall requires an up-to-date analysis such as Haslemere Vision has completed. Unless and until this has been done, the Borough will have fallen short of its duty to cooperate.

8. Conclusion

- 8.1. As required by planning policy, the whole development area of DS06 is **designated as AGLV but must be considered as AONB** under the Waverley adopted LPP1, policy RE3. As required by national and local planning policy exceptional circumstances must be demonstrated if this site is to be considered for development.
- 8.2. **Exceptional circumstances do not include meeting housing quotas** as confirmed by the High Court. In any event, the recent Call for Sites and consultation process has revealed preferable brownfield sites (such as beside the A3 in Hindhead) that, along with windfall sites, are able to meet the housing needs of the area without the allocation and development of the DS06 greenfield site.
- 8.3. In spite of this, the Borough relies on supposed pressure on the town being able to meet its housing needs. In meeting housing needs Waverley will be bound by NPPF paragraph 118 to give great weight to using **brownfield sites in preference to greenfield sites** and the Neighbourhood Plan assumes housing numbers will be met without large development on greenfield outside the Settlement Boundary; furthermore, a larger brownfield site at Hindhead with more than twice the yield than DS06, and as mentioned in the paragraph 8.2, has recently been proposed to Waverley.
- 8.4. Any development of 50 homes on DS06 would **displace protected and endangered wildlife** and therefore does not comply with NPPF paragraph 172 as great weight should be given to conserving biodiversity of our countryside. In this respect, LPP2 is not justified and as such is unsound.
- 8.5. The development contravenes the NPPF paragraph 174 as **it does not safeguard the existing wildlife corridors and stepping stones**. Linked to this is the Climate Change emergency declared by Haslemere Town Council and Waverley in 2019. Allocating DS06 and moving the Settlement Boundary on Scotland Lane, in LPP2, would undermine and contradict the councils' policy to protect the environment in this respect and represent a major lack of soundness in the Local Plan.
- 8.6. Local residents and the Town Council are extremely concerned at the **cumulative effect on traffic with other developments taking place**. Narrow and steep lanes with no pavements pose real risk to safety. DS06 is not accessible on foot by pavements or dedicated paths, to either the station or the High Street.
- 8.7. Development on land at DS06 would have a **wide range of negative rather than positive impacts**: its impact on the landscape is negative, its impact on biodiversity is negative, its impact on traffic congestion is negative, its impact on road and pedestrian safety is negative, its impact on dark skies is negative, its impact on water supply is negative, its impact on Waverley's promotion of the economy is negative, its visual impact is negative and its impact on a heritage asset is negative. This means that there are **no exceptional circumstances** of a positive nature that could conceivably warrant overriding the protection of this land afforded it by national and local planning policies.
- 8.8. In the practical **application of Localism**, the Haslemere community, Waverley's constituents, have in effect voted against this development because it is a large development on a greenfield site outside the Settlement Boundary. In Haslemere Vision's Phase 2 consultation 89% were against. **The Neighbourhood Plan consultation and subsequent approval by the Town Council showed overwhelming majority against. The Town Council has specifically chosen to object to DS06 and Waverley's proposed move of the Settlement Boundary.**

Objection Statement

Waverley Local Plan Part 2



- 8.9. The Haslemere wide community has continually objected to large developments on greenfield sites outside the Settlement Boundary. It is a failure in Waverley's duty to cooperate to ignore the emerging Neighbourhood Plan in the way proposed in LPP2.
- 8.10. **The HSRA with nearly 300 members, whose families and households number over 500 residents of Haslemere, object strongly to LPP2 for the reasons set out in this document.**
