

By email to:

planningpolicy@waverley.gov.uk

Local Plan Part 2 consultation – comments from Haslemere Vision

Haslemere Vision is a voluntary community based organisation that was delegated, by Haslemere Town Council, to consult and compile the Haslemere Neighbourhood Plan (“HNP”). This process has involved the consultation of residents over eight years along with the gathering and analysis of relevant evidence.

In Haslemere, there is substantial community support, demonstrated by several public consultations, for redeveloping brownfield sites before greenfield sites and for building at medium to high densities to protect the environment and provide homes in sustainable locations, closer to amenities, so that local businesses thrive and there is less need to travel long distances. Haslemere looks set to benefit from national trends for much greater home working, bringing money back into the local economy. Haslemere Vision has the following comments on the draft Local Plan Part 2 reflecting issues where the Local Plan does not align with the emerging Neighbourhood Plan.

DM1 – Environmental Implications of Development

Haslemere Vision welcomes the inclusion of this policy, however, we wish to draw to your attention that Haslemere Neighbourhood Plan policy H14 goes beyond the stated requirement of DM1 to “Avoid negative impacts upon biodiversity and maximise opportunities to deliver net gain in relation to ecological and geological assets through the design, structure and landscaping of the development” by setting a target for net biodiversity gain of “at least 20% in Biodiversity units as calculated using nationally or locally recognised metrics such as that produced by DEFRA.” This is the same as the rate currently proposed by Guildford Borough Council in its emerging LPP2, and The Surrey Nature Partnership has formally recommended Surrey’s 11 Local Planning Authorities adopt a policy for Biodiversity Net Gain requiring developers to demonstrate the post-development achievement of a minimum 20% increase in biodiversity units in support of their planning applications. Other planning authorities such as Lichfield and Oxford are also requiring a biodiversity net gain of 20%. Haslemere Vision recommends that consideration is given to including a requirement in policy DM1 that developments achieve a net gain for biodiversity of at least 20% as calculated using nationally or locally recognised metrics such as that produced by DEFRA.

The Haslemere Neighbourhood Plan establishes the Haslemere Ecological Network which maps out key wildlife corridors. This exercise has provided the foundation to improve the network that enables movement between habitats. Haslemere Vision suggests that the LPP2 contributes more positively to ecological networks borough-wide through a similar exercise and through allocating land to replace habitats lost to development.

DM 5 Safeguarding amenity

Haslemere Vision supports the aims of this policy and in particular the adoption of the Nationally Described Space Standards which were well supported by local residents in the Neighbourhood Plan consultations.¹ Haslemere Vision welcomes the provisions at paragraph 2.42 that “In town centre locations, if there is public open space which is readily accessible by foot, there may be justification for less external amenity space, however it is important that private or semi-private space for residents is still provided. Areas such as roof terraces and internal courtyards can contribute to communal space provision” and optimise land use in higher density areas.

For the amenity of new residents, balconies should be provided for all flats or small private gardens for ground floor flats. It should be noted there is a high demand for well-proportioned centrally located houses and flats for older residents who wish to downsize from larger houses in the locality. As such good design quality in new homes needs to be provided.

There is also a significant need for affordable homes due to the relatively high cost of property. Sufficient built in flexibility in the size and layout of homes, and particularly affordable homes, is required so that residents’ evolving living requirements can be met, since growing households are often not able to move homes when they require more living space because of the high cost of moving.

DM6 Public realm

These policies are welcomed, as they will have a positive impact particularly on the local economy and businesses and respond to the needs of an aging population as well as the wider community. Haslemere will have high numbers of residents over 65 years of age in the coming years and specific design consideration for this group should be enhanced to enable inclusiveness and minimise isolation. These policies are important to support the creation of attractive and welcoming places that support the physical and mental health of residents of all ages.

DM 13 - Settlement Boundary

The Haslemere Neighbourhood Plan sets a settlement boundary that excludes un-developed land that is ‘designated’ such as AONB, AGLV. This is because there are sufficient brownfield sites to deliver housing in excess of the housing target without including this site.² This is due to the historical and anticipated relatively high level of windfall site and brown field sites being available to more than adequately meet the target number of new homes. One of Haslemere Vision’s premises is to facilitate much needed new homes, it is not anti-development, by guiding the location of new homes to appropriate locations based on community consultation.

Under the Haslemere site allocation section in Chapter 7, it is noted that the Red Court site (DS06) is the only greenfield site proposed for allocation. It is in an Area of Great Landscape Value that has been proposed for inclusion in the adjacent Area of Outstanding Natural Beauty.³ Waverley’s LPP1

¹ 90% of 222 respondents supported adoption of the Nationally described space standards.

² Settlement boundaries and windfall topic paper.pdf (Haslemere Neighbourhood Plan evidence) for details

³ Surrey Hills AONB Areas of Search Natural Beauty Evaluation by Hankinson Duckett Associates October 2013
<https://mk0surreyhillsnffif4k.kinstacdn.com/wp-content/uploads/2016/02/HDA-Phase-2-Natural-Beauty-Evaluation-Report-Final-07-OCT-2013.pdf>

policies RE1 and RE3 should convey protection over land within the AONB and AGLV. Haslemere Vision opposed the recent planning application for this site⁴ due to it contravening the emerging Neighbourhood Plan policy on the Settlement Boundary, which came about from extensive community consultation.

The Haslemere Neighbourhood Plan has adopted a different approach to LPP1 and the draft LPP2 for estimating the amount of future windfall development. The reasons for this are explained in the Settlement boundaries and windfall topic paper.⁵ Advice was sought from a Neighbourhood Planning Inspector and Planning Consultant on the appropriate position for the Neighbourhood Plan to take with regards local windfall policy that it wishes the District Council to uphold. This planning advice confirmed that it is completely in order for the Neighbourhood Plan to set a windfall rate that related to local context and is commensurate with the Localism agenda set by government, and is in order for the District Council to also adopt through the LPP2.

It should be noted Godalming's windfall has been so high that no further sites need to be allocated for the town, and Farnham did not accept the approach to windfall in LPP1 and recalculated it in their Neighbourhood Plan using a higher estimate. Haslemere Vision asserts that the methodology proposed in the Haslemere Neighbourhood Plan should be adopted also in LPP2. By using this rate, there will be no need to allocate the Red Court site (DS06) at this time. LPP2 states at para 7.9 "There is a requirement to review Local Plans within five years of adoption. As such, in the event that any neighbourhood plans allocating housing, do not progress in a timely manner, this can be considered when reviewing the Local Plan. This will also provide an opportunity to identify if any site allocations have not progressed as expected and what action is needed to ensure delivery of the housing requirement in full." There is thus a mechanism in place to reassess the situation in 5 years' time at which point consideration can be given to allocating further sites in Haslemere if windfall is not being delivered at an adequate rate.

The draft LPP2 settlement boundary includes two sites on the northern edge of Beacon Hill that are designated AONB and have therefore been excluded from the NP settlement boundary. One forms part of Hindhead golf course that has been removed from within the settlement based on NP consultation feedback from local residents. The other is a piece of steeply wooded and habitat rich woodland.

In addition, there are several areas which are proposed for inclusion within the settlement boundary in the draft LPP2 that are within AGLV and are also proposed as candidate AONB (HD report).⁶ It should be noted that Haslemere Vision opposed inclusion of these areas in our response to the Preferred Options Consultation in July 2018.

The LPP2 boundary should be amended to match the boundary set by the Neighbourhood Plan.

⁴<http://planning360.waverley.gov.uk/civica/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=8003997> for details.

⁵ Settlement boundaries and windfall topic paper (Haslemere Neighbourhood Plan evidence) for details

⁶ Waverley Settlement Boundaries Topic Paper p.38 Boundary change 1 & 2.

Area of Strategic Visual Importance

Six gardens of homes on Weydown Road and one home on Bunch Lane are designated as within an Area of Strategic Visual Importance, however, LPP2 now proposes removing these properties from the ASVI.⁷

LPP2 para 4.21 addresses the ASVI designation and states that “The issues that the designation addresses are:

1. Where land is vulnerable to development pressure
2. Where protection is essential due to strategic visual importance
3. Where there are strong environmental reasons
4. For the preservation of the character of the locality
5. In order to prevent coalescence
6. Where parcels of land are relatively small and open on the urban fringe”

It is very likely that the land is vulnerable to development pressure since the reason given for including the gardens on Weydown Road within the settlement boundary is that development has already been permitted for one of them.⁸ In addition, because these gardens are adjacent to the ancient woodland tracts, SNCI land and aquatic wildlife corridor there are strong environmental reasons for the ASVI and AGLV designations. It should be noted that Haslemere Vision opposed the removal of these areas in our response to the Preferred Options Consultation in July 2018.

These areas should remain within the ASVI and outside the LPP2 settlement boundary.

The retention of the Holy Cross Hospital site within the ASVI is welcomed.

As set out in the Haslemere Design statement, the tree covered hill tops of Haslemere form a key visual asset to the local landscape and should be protected. Greater protection of these key features, which are present throughout the Surrey Hills area, should be considered for inclusion within the LPP2.

DM 17 Haslemere Hillside Policy

Haslemere Vision support inclusion of this policy in LPP2.

DM 19 Local Green Spaces

LPP2 designates 6 Local Green Spaces in Haslemere. In preparing the Haslemere Neighbourhood Plan additional sites were identified and ten further sites are deemed to meet the requirements for designation and have been designated as Local Green Spaces in the Plan (refer to Haslemere Neighbourhood Plan policy H13).⁹ These additional sites should be included in the LPP2.

DM27: Development within Town Centres

Haslemere Vision supports inclusion of this policy in LPP2 and notes that it aligns with the Vision, Objectives and Principles of the Haslemere Neighbourhood Plan by supporting proposals within the Town Centre for:

⁷ WBC ASVI Topic Paper page 30. Map LPP2 page 87. Note that the main text of LPP2 makes no mention of the exclusion of these properties from the ASVI.

⁸ Waverley Settlement Boundaries Topic Paper p.38 Boundary change 1

⁹ Refer to Haslemere Neighbourhood Plan Local Green Spaces Assessment paper November 2020 for details.

“a) Schemes that will encourage investment and increase the viability and vitality of the area through a mix of town centre uses including markets and food & drink uses.

b) Higher density housing schemes, particularly where housing is promoted as part of a mixed use development.

c) Schemes that include the provision of street furniture and facilities for people walking and cycling, such as benches, in new or renovated public spaces.

d) Green infrastructure, particularly where this contributes to the mitigation of air pollution.”

DM28: Access and servicing

The areas allocated to access and servicing, Haslemere High Street and the car park to the rear of Boots, seem unnecessarily large and much extended versus the area that is currently used. The car park to the rear of Boots was used for free public parking for many years with access and servicing for the retail premises taking up a very small proportion of the space, yet the whole site has been allocated for access and servicing. This site would be ideally suited to much needed downsizer apartments due to the easy access to retail and amenities.

DM35: Reuse of and alterations to large buildings

Haslemere Vision welcomes this policy that encourages “the subdivision of larger dwellings or the conversion of non-residential buildings into small residential units as a means of increasing housing supply, provided it complies with other policies in the Plan.” This will further encourage additional windfall development similar to that already seen in Haslemere. Any new homes should meet the Nationally Described Space Standards to provide adequate amenity as referenced above under DM5.

It is noted that Policy DM26 states that “Proposals for employment development should not result in a net loss of residential units unless justified by a clear economic need”. This policy is important to ensure a balance is maintained between employment and residential use. Haslemere Neighbourhood Plan policy H16 also has provisions to prevent the loss of employment space.

DM 36: Self-build and custom house building

Haslemere Vision supports this policy but are concerned that offering self-build plots within developments could compromise the density of homes on central sites. It is hoped that this would be a consideration when applying the following policy provision:

“Where an applicant considers that it is not viable to meet the 5% requirement the Council will expect this to be demonstrated with robust evidence and may negotiate a proportion which is achievable.”¹⁰

¹⁰ Extract from policy DM36 Waverley’s Local Plan part 2

Site allocations

DS01 Haslemere Key Site

This site is described as 2.5ha with an approximate density of 50-150dph when developed. We do not have data to determine the area of the site that will be used for uses other than residential development (such as car parking, retail, business uses) but even if only 0.5ha were available for homes, at 150dph this would provide 75 dwellings rather than the “at least 40 dwellings” that are proposed in LPP2. Making better use of this site for housing would protect the green spaces surrounding Haslemere from development and meet the wishes of the community, namely, prioritising brownfield sites over greenfield ones.

DS04 Youth Campus

It is our understanding that this site will be developed for affordable housing, however, no mention is made of this on page 137 of LPP2. If it is intended for affordable housing then offering a percentage for self-build is potentially inappropriate and may compromise feasibility and the overall number of units the site can deliver. Haslemere Vision suggest a firm commitment is made to providing much needed affordable housing on this site by stating so in LPP2.

LPP2 states that “The Council is working to ensure existing community groups which use the site can be housed elsewhere”. Haslemere Vision is aware that some groups have been relocated but that if all cannot be found new premises a portion of the site may not be redeveloped initially. We, therefore, urge the council to make best efforts to assist in relocating all users so that a comprehensive redevelopment of the whole site can occur.

DS06 Red Court— see comments under DM13 Settlement boundary on page 1, above. Haslemere Vision opposes the allocation of this site as it is on AGLV which may well move to AONB designation and there are other brownfield sites and windfall that meet the housing target requirements.

DS07 Fairground Car Park

Haslemere Vision welcomes the proposals for this site:

“designed to maximise Place Shaping opportunities in Wey Hill through improvements to the public realm, to the viability and vitality of the area, and by promoting the distinctive character of the area.”

Retaining “at least existing parking space capacity, unless it can be demonstrated there is sufficient parking in the area or additional capacity can be provided at an alternative location within walking distance of the town centre.”

Demonstrating “that development will not have a likely significant effect on protected habitats sites.”

These align with the Vision, Objectives and Principles in the Haslemere Neighbourhood Plan and accord with the wishes expressed by the community.

This land was previously common land and as reflected in the strong opposition at the time of its de-registration, it is significant to our community. For this reason, it is important that the community participate in determining the development plans for this site and Haslemere Vision will contribute to this process.

DS09 National Trust car park, Branksome Place

This site abuts important habitats and wildlife corridors and proposes a density of 30dph. It is currently used for parking and where that parking will move to should be a consideration in any development plans. If another area is to be hard landscaped then this is effectively a greenfield development outside the settlement boundary. In addition, whilst physically close to the settlement boundary, the access to the site from the main road is long and therefore it is not as sustainable. Caution is required in developing this site given the important habitats that surround it.

Should you wish to discuss or clarify any of the comments in this letter please do not hesitate to contact me.

Kind regards

Lesley Banfield

Haslemere Vision Chair