

WA/2024/02460 – Outline application with all matters reserved except for access, for the phased development of site to provide 14 residential dwellings comprising up to 8 one/two bedroom dwellings for affordable accommodation and 6 serviced plots for four/five bedroom detached self/custom build homes together with internal access road, amenity space and landscaping. at LAND COORDINATES 489444 132452 HEDGEHOG LANE HASLEMERE

Applicant: Ian Rhodes - Monkhill Ltd and Transform Housing and Support
Parish: Haslemere
Ward: Haslemere East
Grid Reference: E: 489444
N: 132452
Case Officer: Russell Brown
Neighbour Notification Expiry Date: 19/01/2024
Expiry Date / Extended Expiry Date: 19/03/2024 / 09/05/2025
RECOMMENDATION That permission be **REFUSED**

1. Executive Summary

The application is referred to the Planning Committee because it has been called in by Councillor Weldon.

The application site is a sloping, triangular-shaped open field with a small stable building to the west side of Hedgehog Lane and to the south of Haslemere, forming part of the Longdene estate. It is surrounded by a few scattered residential buildings.

The outline application is for 14 dwellings (Use Class C3) - a mix of affordable housing and self or custom build - with all but access a reserved matter. Access would be via the private driveway via an existing point and a new one. An internal access road, amenity space and landscaping are also proposed.

The application proposal would provide a minor, albeit important contribution to housing supply, but has a major adverse impact on the National Landscape thereby failing to conserve or enhance its landscape and scenic beauty. It would also have a moderate adverse impact on the Area of Great Landscape Value. Furthermore, there is insufficient information to determine the impact on hazel dormice and a Habitat of Principal Importance, and whether a biodiversity net gain would be achieved. This is not outweighed by the provision of affordable housing and self or custom build plots.

2. Site Description

The application site of approximately 1.53ha is a triangular-shaped open field previously used for grazing, which is undeveloped save for a small detached stable building (used to store construction materials associated with nearby development)

close to the southern boundary of the site and adjacent to a driveway. The site is on elevated ground with levels markedly sloping down towards the south, and less so to the east. It is screened by boundary trees and evergreen shrubs on all sides and is therefore not readily visible from the public realm. The private driveway to Longdene House is flanked by trees, which are the subject of Tree Preservation Order (TPO).

The application site forms part of the Longdene estate comprising Longdene House, The Lodge with the four approved dwellings to the rear, the recently permitted new dwelling named Pool House given its location on a former swimming pool and the newly constructed Longdene Hall (which is outside the applicant's ownership) with associated outbuildings and gardens. These are located to the south / southwest of the site. In previous applications the Longdene estate was divided into 4 distinct areas; Area A (application site), Area B (approved four dwelling scheme), Area C (Longdene House and Pool House), Area D (Longdene Hall). Longdene House is a Building of Local Merit, in other words an undesignated heritage asset.

The application site is bordered by existing residential development to the north and east. To the former, the land at Sturt Farm (now Grasslands Close) is being developed for up to 135 dwellings with a landscape buffer being incorporated between it and public footpath no. 35. This runs in-between that site and the one this application relates to, linking Hedgehog Lane to Sturt Road (A287) where there are three Grade II listed buildings nearby. The latter are low density suburban dwellings in a 'traditional' style. There is also a mixture of late Victorian, early Edwardian, Arts and Crafts, 1930s, Georgian and more contemporary building styles in the vicinity. This site is outside of the Haslemere settlement boundary to the south.

3. Proposal

Outline planning permission is sought for the erection of 14 dwellings with associated internal access road, amenity space and landscaping. 8 (57%) of the total number of homes provided would be affordable (all 1 bed, 2 person units) and 6 would comprise self-build or custom build plots (two x 4 bed houses and four x 5 bed houses).

All matters (appearance, landscaping, layout and scale) other than access are proposed to be reserved as part of the outline application. Notwithstanding this, the applicant has submitted an illustrative layout plan to allow consideration of whether the proposed number of units could reasonably be accommodated on the site. The indicative layout plans show the houses and their double garages to be arranged either side of a curved access road with the flatted block to the east side of the site. The house would feature front and rear gardens and the flatted block a communal garden of 1168m² for its residents. 324m² of amenity space would be provided for the whole site. 32 car parking spaces are proposed. The overall building footprint is 1,768m².

The proposed development would be accessed via two existing accesses off the established private driveway from Hedgehog Lane serving Longdene House, as well as a pedestrian access to the east of the site onto Hedgehog Lane.

4. Relevant Planning History

WA/2022/02214: Outline application with all matters reserved except access for the erection of 16 dwellings (11 affordable dwellings and 5 self-build dwellings).
Declined to determine 26/06/2023

WA/2021/02956: Outline application for with all matters reserved except for access for the erection of 16 dwellings (11 affordable dwellings and 5 self-build dwellings).
Appealed for non-determination and dismissed 01/06/2023

WA/2018/0151: Hybrid Planning Application;- Change of Use, extension and alterations to office building to provide 1 dwelling together with the erection of a detached garage; outline application, with access and landscaping to be determined, for the erection of up to 28 dwellings following demolition of 2 dwellings, glasshouses and outbuildings (as amplified by Flood Risk and Drainage Strategy Assessment received 28/03/2018, additional ecology information received 15/05/2018 and planning statement addendum received 18/06/2018). Refused 09/08/2018 and appeal withdrawn 06/08/2019

WA/2016/1226: Hybrid Planning Application;- Change of Use, extension and alterations to office building to provide 1 dwelling together with the erection of a detached garage; outline application, with access and landscaping to be determined, for the erection of up to 29 dwellings following demolition of 2 dwellings, glasshouses and outbuildings; alternative proposal, Scheme B. Refused 20/09/2016 and appeal dismissed 10/01/2019

5. Relevant Planning Constraints

National Landscape

Area of Great Landscape Value (AGLV)

Wealden Heaths II Special Protection Area 5 Km zone

East Hants Special Protection Area 5 Km zone

Ancient Woodland 500m buffer

Grade 4 Agricultural Land

Flood Zone 1

6. Relevant Development Plan Policies and Guidance

- Waverley Borough Local Plan (Part 1): Strategic policies and sites (adopted February 2018): SP1, SP2, ALH1, ST1, ICS1, AHN1, AHN3, RE3, TD1, HA1, NE1, NE2
- Waverley Borough Local Plan (Part 2): Site Allocations and Development Management Policies (March 2023) (LPP2): DM1, DM4, DM5, DM9, DM11, DM15, DM23, DM25, DM34, DM36

- Haslemere Neighbourhood Plan (November 2021): H1, H2, H4, H5, H6, H7, H9, H11, H12

Other guidance:

- The National Planning Policy Framework 2024 (NPPF)
- The National Planning Practice Guidance 2014 (NPPG)
- Affordable Housing SPD Update (March 2023)
- Surrey Hills National Landscape Management Plan (2020-2025)
- National Design Guide (2019)
- Haslemere Design Statement (2012)
- Climate Change and Sustainability Supplementary Planning Document (October 2022)

7. Consultations and Town Council Comments

Haslemere Town Council	No objection
Environmental Health	No conditions required
Surrey County Archaeology	No objection subject to a condition securing a programme of archaeological works
Surrey Highway Authority	Recommend conditions
Surrey Hills AONB Planning Adviser	Objection
Surrey Wildlife Trust	Objection - hazel dormouse presence / likely absence surveys, an assessment of on-site habitats against Habitats of Principal Importance criteria and the statutory Biodiversity Net Gain metric in Excel format are required.
Thames Water	No objection if the developer follows the sequential approach to the disposal of surface water.
WBC Housing Strategy & Enabling	Support
WBC Tree Officer	No objections subject to conditions

8. Representations

18 representations have been received raising objections on the following grounds:

- More development only adds to problems with insufficient infrastructure in Haslemere.
- Traffic increases are at saturation point.

- This planning application apparently ignores the neighbourhood plan.
- Building on green space outside the settlement boundary should be refused.
- This planning application would neither conserve nor enhance the protected Surrey Hills National Landscape, and would inflict great and permanent harm on this area.
- The land is outside the settlement boundary in the Haslemere Neighbourhood Plan.
- WBC's established policy has been to refuse permission to develop this site and WBC have defended successfully their refusals at appeal.
- This application fails to comply with the NPPF (December 2024) and the HNP.
- Loss of biodiversity / disruption of wildlife habitats, destruction of green space and detriment to the intrinsic historical character of this area.
- Construction here would undermine public confidence in local government.
- Safety issues from too much traffic, including for young children and especially at the dangerous junction of Hedgehog Lane with Longdene Road.
- This application is neither in the public interest nor are there exceptional circumstances
- That a charity is one of the applicants should not serve to as justification to overlook any of the objections.
- Housing development on this site would urbanise this area given the proximity of another recent residential scheme and only adds to the already oversaturated area.
- Five substantial trees (circa 20+ metres height) on either side of the driveway were felled between September 2021 and September 2022.
- Repeated applications for this site appear to be wasting valuable time and resources of the planning authority.
- WBC is urged to reject this application due to environmental, safety and resource concerns.
- This application is not in the interest of the Haslemere community.
- Amenities in Haslemere are already at breaking point and more housing only exacerbates the problem.
- Emergency services may struggle to access the site efficiently.
- The development would erode the buffer zone to the South Downs National Park, increasing pollution, noise, and light disturbance that could have a detrimental impact on the local flora and fauna, including protected species.
- Approving this development would set a dangerous precedent for further encroachment into protected countryside and weaken anti-urban sprawl policies.
- Building here would undermine the Council's sustainability commitments in respect of increased car dependency and loss of green corridors.

One representation has been received supporting the proposal because:

- There are insufficient self-build plots to meet the demands of people on the register.
- Self-build plots would give locals the chance to build their own home.
- The plot is relatively flat, in a sustainable location and there is sewage and electricity nearby.
- The proposed development would appear as an extension of the Sturt Farm scheme.
- The Council is likely to get a higher quality of design from self-builders than a mass development, which would enhance the Surrey Hills National Landscape.

Councillor Nicholson, as the ward councillor for Haslemere East, has raised an objection on the following grounds:

- This third scheme is little different from the second, which was rejected by the Planning Inspectorate.
- This proposal disrespects the local community and the greatly valued concepts of the National Landscape.
- There would be light pollution in this relatively dark area set in high ground.
- If a site is just not suitable then it should be refused regardless of the incentives.
- There is a greater danger of precedents in National Landscape areas if this decision was approved.

9. Planning Considerations:

10. Principle of development

Policy SP1 of the LPP1 states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development.

Policy SP2 of the LPP1 focuses development at the four main settlements, one of which is Haslemere. Policy ALH1 of the LPP1 outlines that the main settlement of Haslemere is allocated a minimum of 990 new homes (including homes permitted and built since April 2013). Paragraph 2.8 of the Haslemere Neighbourhood Plan (HNP) sets out that less than half of the allocation now remains to be met taking into account what has already been built and approved (as at January 2020) and the anticipated future windfall opportunities.

The supporting text to Policy DM13 of the LPP2 states that outside of settlement boundaries, whether the principle of development is acceptable will be determined on a case-by-case basis through consideration of factors including a site's relationship with the defined settlement, and the sustainability of its location. In the context of the spatial strategy as a whole, it is, however, considered that the development plan allows for development outside the settlement boundary around the settlement.

Areas outside of the settlement boundary are defined as rural areas in the supporting text to Policy DM15 of the LPP2 and therefore this policy applies. It is worth noting that the proposal is an affordable housing exception scheme that is one of the forms of development that may be acceptable within rural areas set out by national policy and paragraph 3.30 of the LPP2.

The tests for development in rural areas in the aforementioned policy are the following:

- a) Not be isolated from everyday services and facilities, while maximising opportunities for walking and cycling and seeking to avoid dependency on private vehicles, taking

- account of the nature and functional needs of forms of development which are acceptable in rural areas;
- b) Recognise the natural beauty and undeveloped character which is intrinsic to the open countryside, together with the distinctive character and pattern of development in areas of urban-rural transition and rural settlements, while making efficient use of land;
 - c) Recognise the benefits of areas of best and most versatile agricultural land. Where it can be demonstrated that significant development of agricultural land is necessary, areas of poorer quality should be preferred to those of higher quality.

In terms of criterion a, the site is approximately a 10 minute walk from / to the Haslemere train station and the same to the nearest bus stops. These are served by routes 19, 23, 70, 71, 123 going between Guildford, Chiddingfold, Godalming and Liphook, and Aldershot, Midhurst and Bordon. The town itself is served by two hospitals, a leisure centre, supermarkets, typical uses on the high street (Wey Hill), schools, nurseries, vets, churches, dentists and a hotel with pub along with several other public houses. It is considered to be in a highly sustainable location. This will be covered in the transport section of this report; criterion b will be addressed later on in the report as well.

As regards criterion c, the site, previously used as a paddock and for grazing has a classification as Grade 4 agricultural land. Best and most versatile (BMV) agricultural land is graded 1 to 3a with the lowest grade being 5. Grade 4 is defined as land with significant limitations, restricting it to lower-yield crops or permanent pasture. The fact the site does not form part of any agricultural holding and is not currently in use for agricultural purposes results in Officers coming to the view that the proposal would not result in the loss of an agricultural holding or the BMV land. No objection is therefore raised to the loss of the agricultural field and there is no conflict with criterion c of Policy DM15 of the LPP2.

The principle of residential development on this site is subject to multiple considerations, which will be discussed in detail within this report.

11. Housing Land Supply

The Council's current annual housing requirement is 1,481 dwellings based on the standard method. Applying the 5% buffer to the housing requirement for the five year period of 1 April 2024 – 31 March 2029 increases the annual housing requirement to 1,555 dwellings. At 1 April 2024 there were 1,998 dwellings that the Council considered to be deliverable in the five year period, equating to a 1.28 year housing land supply.

As the Council cannot currently demonstrate a five year housing land supply, paragraph 11(d) of the NPPF 2024 is engaged via footnote 8. Therefore, unless the application of policies in the NPPF that protect areas or assets of particular importance (including Special Protection Areas and National Landscapes) provides a strong reason for refusing the development proposed, then permission should be granted

unless it can be demonstrated that any adverse impacts demonstrably outweigh the benefits when assessed against the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

The application proposes the erection of 14 dwellings. It would therefore represent a minor, albeit important contribution to housing supply. This is given significant weight in the planning balance. However, it is important to note that the presumption on favour of sustainable development, or the “tilted balance”, in paragraph 11 of the NPPF does not apply where the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the development. National Landscapes are listed as comprising such a protected area or asset.

12. Affordable Housing and Type / Unit Mix

Policy AHN1 of the LPP1 requires a minimum provision of 30% affordable housing and the mix of dwelling types, sizes and tenure split to be in line with the most up-to-date evidence of housing needs and the Strategic Housing Market Assessment.

Policy AHN3 of the LPP1 sets out that the Council will require proposals for new housing to make provision for an appropriate range of different types and sizes of housing to meet the needs of the community, and that the development of specialist housing will be encouraged.

Although not entirely relevant to the proposal, the supporting text to Policy ICS1 of the LPP1 (paragraph 8.3) states that supported accommodation qualifies as social and community infrastructure.

Policy H5 of the HNP outlines that new residential developments should provide a range of dwelling types and sizes to meet the needs of the neighbourhood area taking into account the most up-to-date evidence and to reflect the character of existing development in the surrounding area.

In this case, eight (57%) homes would be affordable, which are all to be one bed, two person flats. Whilst the LPA can only insist on 30%, if planning weight is given to the provision of 57% affordable then the remaining 27% of the units (referred to as ‘additionality’) should be secured via legal agreement. This also adds to the amount of weight this can be given as a public benefit of the scheme.

There is no tenure split proposed as such, it is all to be social rent, which is the Council’s preference for rented homes (as opposed to affordable rent) as stated in the Affordable Homes Delivery Strategy 2022-25: Build More, Build Better, Build for Life. Social rent is the most affordable tenure of all, equivalent to around 55% of the local market rent. There is a pressing need (and limited opportunity) to deliver this tenure to meet the needs of the Council’s lowest income households. The WBC Housing

Affordability Study (December 2021) seeks a 70:30 split between affordable homes to rent and affordable home ownership. For supported housing, the need in terms of affordable tenure is not strictly in line with this, but there is evidence to support the case for 1 bed self-contained supported dwellings on this site to meet a borough-wide need for independent living, which better suits people with complex needs, mental health issues, people with learning disabilities, autism, etc. In terms of dwelling sizes, the Council's latest needs evidence for size and tenure is the Waverley Housing Affordability Study 2021 as follows:

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Affordable home ownership	20%	50%	25%	5%
Affordable housing (for rent)	40%	30%	25%	5%

The provision of all one bedrooms would therefore be non-compliant with the most up-to-date evidence of housing needs. The West Surrey Housing Market Assessment (WSHMA) - Waverley Addendum (December 2015) detailing Haslemere's housing needs is an older piece of evidence, presenting one bedroom units as a more pressing need and two, three and four beds as being less in demand. However, this is a specialist type of housing that would allow individuals to increase their independence, enabling them to live healthy and fulfilling lives in a well-connected location, both for the future occupier and the support staff. As such, the non-compliance with the preferred mix for number of bedrooms would not constitute a reason for refusal in this instance.

The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) does not distinguish between self-build and custom housebuilding. The benefits of these are recognised by Planning Practice Guidance (PPG) finding that it helps to diversify the housing market and increase customer choice. NPPF paragraph 73b also supports the delivery of a variety of land coming forward to meet the needs of groups with specific housing requirements including for those people wishing to commission or build their own homes.

In terms of the self-build and custom dwellings, the Council is required to grant sufficient planning permissions to meet the demand by individuals and groups for plots, often for those that are detached, shown on their Self-Build and Custom Housebuilding Register. However, the provision of affordable housing is prioritised over the provision of custom and self-build plots, which are considered as market housing. The WSHMA states that the need for these properties will be met as part of the general supply of housing and not as an addition to it. Having regard to LPP2 Policy DM36, there is no policy requirement for custom and self-build housing as part of this development proposal, but the policy does support this where schemes are appropriate to the scale, design and character of the existing community.

Two 4 bed houses and four 5 bed houses are proposed. Whilst all detached plots, the mix would fail to comply with the need for different sized homes in Table 79 of the WSHMA - Waverley Addendum and Table 9.1 in the LPP1. A compliant mix would be one x 1 bedroom house; two x 2 bedroom houses; two x 3 bedroom houses; and one x 4 bedroom house. No evidence has been provided as to how the proposed mix would meet the need of custom or self-builders and therefore it has not been justified. Notwithstanding this, there is a substantial and currently unmet need in the borough and these are therefore regarded as a significant public benefit of the proposal. Six new plots would not greatly improve the total supply, but in circumstances such as where the housing supply position is not met, any additional provision would be valuable.

It is noted that self-build and custom housebuilding developments present an opportunity for innovative new design and for broadening the range of types and styles of housing being built. Self-build and custom housebuilding developments should projects respond positively to their built and natural context.

In conclusion, the type and size of affordable housing and the self-build and custom plots would meet a genuine local need. The application therefore complies with Policies AHN1 and AHN3 of the LPP1 and Policy H5 of the HNP.

13. Density

HNP Policy H2 outlines that higher densities, specifically 75 dph (dwellings per hectare), are proposed for sites within 1000 metres from the station (such as this site) to encourage sustainable development. Based on a site area of 1.55 hectares, the proposal would provide 9 dph. Officers consider this to be a very low density that would therefore be less than would be supported by the policy. However, this does not indicate that this application should be refused for that reason. It is noted that if the site was developed at 75 dph, 116 dwellings would be located on site, which would have a much greater impact on the National Landscape and character and appearance of the surrounding area than the current proposal.

As such, the site density is considered to be acceptable given the site constraints.

14. Visual amenity and impact on the Surrey Hills National Landscape, AGLV and the character and appearance of the area

NPPF paragraph 187 requires planning decisions to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes with paragraph 189 stating that great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes which have the highest status of protection in relation to these issues.

Paragraph 190 of the NPPF outlines that permission should be refused for major development within National Landscapes other than in exceptional circumstances, and

where it can be demonstrated that the development is in the public interest. The need for it and the impact of permitting it, or refusing it, upon the local economy; the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and any detrimental effect on the environment, the landscape and recreational opportunities should be assessed.

Policy RE3 of the LPP1 states that new development must respect and, where appropriate, enhance the distinctive character of National Landscapes and AGLV with LPP2 Policy DM4 of the requiring development to respond effectively to its surroundings, reinforce local distinctiveness and landscape character, including local topography and views, and take into account existing features of the site. The site is in a rural area and part b of Policy DM15 of the LPP2 outlines that development in rural areas should recognise the natural beauty and undeveloped character that is intrinsic to the open countryside, while making efficient use of land.

Part H1.3 of HNP Policy H1 outlines that development outside the settlement boundaries will be strictly controlled and only be supported where they otherwise conform with national and local planning policies. Effectively therefore this policy provides a presumption against development outside the settlement boundaries and on land designated as National Landscape or AGLV.

The Surrey Hills Management Plan 2020-2025 sets out the vision for the future management of the Surrey Hills National Landscape by identifying key landscape features that are the basis for the Surrey Hills being designated a nationally important National Landscape. Policy P3 of this states that "*Development proposals will be required to be of high quality design, respecting local distinctiveness and complimentary in form, setting and scale with their surroundings, and should take any opportunities to enhance their setting.*" Policies RT3, P1, P2, P4 and P6 are also considered to be relevant.

The parts of the site that are not within the National Landscape are within an AGLV. The submission alleges that this is approximately 30% of the site area and that this is "*a significant proportion of the site*". Officers strongly disagree and consider that a more accurate proportion of the part of the site that is outside the National Landscape is approximately 15%. Even if it was 30%, this would not be considered to be a significant proportion of the site. It is noted that the line showing the boundary between the National Landscape and the AGLV on the Landscape & Visual Baseline Assessment and Local Photoviewpoint Locations is incorrect.

The HNP defines AGLV as: "*a local landscape designation for an area considered to have high visual quality complementing areas designated as Areas of Outstanding Natural Beauty [now National Landscape]. For much of the area in Waverley the AONB and AGLV designations are contiguous, however there are areas where the AGLV designation extends beyond the AONB.*" It is worth noting that the part of the site designated as AGLV was not recommended as an additional area of the Surrey Hills

National Landscape within the recent review because this land north of the public footpath relates more to the urban edge, and Grassland Close forms a clear boundary.

The South Downs National Park is located to the south of the site, passing within approximately 0.5km at its closest point, but with no intervisibility due to landform. As such, the proposal would have no material impact upon it.

At a national level, the site lies within Wealden Greensand (National Character Area 120). This identifies the key characteristics including:

- A long, narrow belt, typified by scarp-and-dip slope topography. The Greensand forms escarpments separated by a clay vale: the overall undulating and organic landform – particularly in the west – gives a sense of intimacy to the landscape.
- There are extensive areas of ancient mixed woodland of hazel, oak and birch, with some areas having been converted to sweet chestnut coppice. These areas reflect the diverse geology.
- Semi-natural habitats include remnant lowland heathland; the wetlands associated with the River Arun in West Sussex; and unimproved acid grasslands found in commons, parklands, heathland and other areas of unimproved pasture.
- Fields are predominantly small or medium, in irregular patterns derived from medieval enclosure. Boundaries are formed by hedgerows and shaws, with character and species reflecting the underlying soils; dense and species-rich hedgerows on the clay and often low trimmed hawthorn and blackthorn hedges on more acidic soils.
- The rural settlement pattern is a mixture of dispersed farmsteads, hamlets and some nucleated villages. Large houses set within extensive parks and gardens are found throughout the area.
- The local built vernacular includes the use of Greensand, ragstone and, in the west, malmstone, bargate stone, plus dark carrstone patterned in the mortar between stones ('galleting') in Surrey, as well as timber-framing and weatherboarding.
- There are a range of historic landscape features. Sunken lanes cut into the sandstone are a historic and characteristic feature, as are older deer parks and more recent 18th-century parklands.
- Surface water is an important feature with many streams and rivers passing through.

The site is outside of a character area in the Surrey Landscape Character Assessment (SLCA): Waverley Borough with the closest identified area being GW5: Hindhead Wooded Greensand Hills.

The land within the 'Primary, Secondary and Tertiary Visual Envelopes' has a 'high sensitivity'. To that end, the applicant has submitted a Landscape & Visual Appraisal (LVA), which also predicts the magnitude of effect on these as low or very low. The LVA identifies that the National Landscape and the AGLV have a 'high' Susceptibility to Change and Sensitivity. The size / scale of the change is assessed as local and the predicted duration of effect is considered permanent but moderated with the Magnitude being low. It deems the significance of effect to be 'medium'.

A high susceptibility to change as a result of a development proposal would be due to its proximity, scale or the landscape type of the affected land. An assessment of Magnitude of Effect on individual landscape receptors depends on the size / scale of effect, whether this is a Nationally Designated Landscape, Regional Character Area / Local Authority Designation or Local Character Element, and the duration of effect. The significance of effect is a combination of the assessed sensitivity of effects (high) and the assessed magnitude (low).

It is considered that the LVA has erred in assessing the Magnitude of Effect as 'low' given that the size / scale of effect relates to a Nationally Designated Landscape (and a Local Authority Designation in respect of the AGLV), although it is accepted that the duration of effect is permanent, but has the potential to be moderated through planting / natural screening. However, this should not be used a way of mitigating a proposal that otherwise has an unacceptable impact on the landscape and with landscaping being a reserved matter none of those details have been submitted at this stage. As such, applying the table in paragraph 6.06 (which combines the assessed sensitivity of effects with the assessed magnitude) to a Magnitude of Effect of high or even medium combined with a high sensitivity is considered to equal a significance of effect of 'high'.

As a result, Officers consider that the submitted LVA comes to an overall value judgement on the predicted landscape impact of the proposed development that is incorrect. This is said to be 'moderate adverse' on the National Landscape with 'minor adverse' impacts on land identified as AGLV. These are defined as being "*out of scale with the landscape or at odds with the local pattern and landform*", and / or leaving "*an adverse impact on a landscape of recognised quality*"; and affecting the "*landform or scale of the landscape*", and / or affecting "*an area of recognised landscape character*". Whilst that is true, it is also considered to be the case that the proposal has a much greater impact on the National Landscape and AGLV. The latter is considered to suffer from the aforementioned 'moderate adverse' impact because the effects go beyond only an 'effect' with the proposed built form being at odds with its high visual quality, which is therefore an *adverse* impact. In terms of the National Landscape, Officers consider that it is clear that there is a 'major adverse' impact. This is described as:

- effects that cannot be fully mitigated and may cumulatively amount to severe adverse effect, and / or;
- effects that are at a considerable variance to the landscape degrading the integrity of the landscape, and / or;
- effects that will be substantially damaging to a high-quality landscape.

The Levelling-Up and Regeneration Act of December 2023 includes a new requirement at 66B(6) (a) that a Local Planning Authority, being a relevant authority, for the purposes of the Act, in performing its function in relation to, or so as to affect, land in a National Landscape "*must seek to further the purpose of conserving and enhancing*

the natural beauty of the area of outstanding natural beauty". This is a material planning consideration since the previous decisions were made.

As such, the proposal must do all it reasonably can to further the statutory purposes, including going beyond merely mitigating harm. This could include, for example, contributing to the conservation and enhancement of the Protected Landscape's wildlife, ecological value and quality, geological and physiographical features, water environment, dark skies, tranquillity, opportunities for access to nature, and landscape character for which the area was designated. The relevant Landscape Guidelines for Built Development in the SLCA for the Wooded Greensand Hills are as follows:

- Conserve the secluded, largely unsettled landscape.
- Conserve the distinctive pattern and character of existing settlements and historic buildings and their settings.
- Conserve the rural roads and sunken lanes minimising small-scale incremental change such as signage, fencing, new domestic access or improvements to the road network which would change their character and take measures to protect them from damage by vehicles.
- Ensure infill development is sensitive to tree lined sunken lane boundaries and conserves and protects the distinct character of the area.
- Conserve and protect the distinct relationship and character between historic cores of towns and villages and the surrounding countryside.
- Conserve areas of undisturbed wooded skyline.
- Ensure that lighting schemes are assessed for visual impact and encourage conservation of the existing 'dark skies' within this sparsely settled area.

It is considered that the proposal achieves a few of these, namely conserving Longdene House, a historic building, and its settings; conserving Hedgehog Lane, a rural road; it has no impact on the historic core of Haslemere; and it would not have any effect on an undisturbed wooded skyline. However, it would disrupt a secluded, largely unsettled field and not be in keeping with the distinctive pattern and character of the existing settlement, this having developed along public highways. It is also insufficient to merely maintain or support existing opportunities, although it is clear that there is a major adverse impact on the National Landscape's geological and physiographical features, and landscape character. This is an attractive field that is in an important elevated position on the edge of Haslemere contributing to its setting and the proposed development would fundamentally change the character of the site from a paddock to a developed site. Additionally, there would be light spill from the upper stories and possibly the roofs in this elevated location at times of darkness, causing light pollution to dark skies (identified as Zone E1 by the HNP in Policy H10). It is not accepted there the loss of approximately 1.53 ha of open land would be unavoidable; this is an indication that the application should be refused to avoid such a loss. Given the notably sloping levels on the site, Officers reject the assertion that there would be "*minor reprofiling to existing slopes*". The proposal also fails to deliver enhancements to the natural beauty of the area or create new opportunities for access to nature, particularly because this is an outline application that does not provide the details

required. The impact on wildlife and the National Landscape's ecological value and quality will be assessed in the relevant section of this report.

As such, the proposal fails to contribute to the conservation and enhancement of the National Landscape contrary to the Levelling-Up and Regeneration Act, the local plan and the neighbourhood plan. Additionally, NPPF paragraph 190 is clear permission should be refused for major development in the National Landscape, other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Whilst the provision of affordable housing and self-build and custom plots is much-needed, this conflicts with the aim of conserving and enhancing the beauty of the landscape as per Surrey Hills AONB Management Plan Policy P4. It is not considered that the impact upon the local economy from refusing the development would be adverse given that eight of the dwellings would be those on low incomes, reducing the amount of economic benefit to Haslemere, and the construction period would be in stages rather than as one project since the remaining six dwellings are to be self or custom build. The applicant has not explored the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way. However, there are other similar sized sites in the Borough that do not fall within the National Landscape or an AGLV which would be more suitable for residential development. There are challenges in the Borough in respect of there being sufficient sites to meet the need for self or custom build plots; this is recognised. However, this would not constitute exceptional circumstances on its own. The detrimental effect on the landscape (and to an extent the environment) has been covered in detail in this section. The rest of the environmental impacts and any impact on recreational opportunities will be assessed in the relevant sections of this report.

It is also important to give consideration to the sensitivity of visual receptors, together with the magnitude of the visual effect, and any potential measures to mitigate adverse effects. It is the applicant's case that there would *"generally be moderate or slight adverse impacts on private land within a tightly drawn visual envelope primarily within the red line area and associated with the existing driveway to Longdene House and associated residential developments, with limited slight adverse impacts on a limited number of public viewpoints and residential properties beyond the red line application boundary"*.

However, this was argued before at appeal and the Inspector found that the site cannot be divorced from the surrounding area, nor from the fields within the wider area. It is noted that six new dwellings (a net gain of four) have been permitted around Longdene House since the first appeal was dismissed on this site. Only WA/2023/02173 (4 dwellings following demolition of 2 dwellings) has been determined since the last appeal, however. The Inspector also found that those already permitted schemes do not diminish the contribution that the appeal site makes to the rural character of the area, including this part of the National Landscape, whereas the appeal scheme would (noting this was for two more dwellings). This is still considered to be the case.

The applicant has provided 16 viewpoints within the submitted LVA. They are each assessed as follows:

Photo viewpoints 01, 02, 03 and 03A are from within the site, which is private land, and are therefore very localised views. Aside from building on land that is part of the National Landscape (which is harmful to its outstanding natural and scenic beauty), the proposal from these very close range views limited to future residents and visitors would accordingly have minimal impact on the character and appearance of the wider area.

Photo viewpoints 04, 05, 06, 07, 07A, 07B, 07C and 07D are all from private land, mostly on the access driveway, but also in front / to the east of Longdene Lodge. It is telling that there are no viewpoints taken from public land beyond viewpoints 08, 09 and 09A (and possibly 10), which are discussed below. As with viewpoints 01, 02, 03 and 03A views of the site would be very localised / close range and where they are orientated towards the site, the effect of the proposed development in these views would only be to the setting of Longdene House and its grounds.

Photo viewpoints 08 and 09 are along the footpath to the north of the site and do not provide views of the part of the site upon which built form would be constructed. Photo viewpoint 09A is not shown on the Landscape & Visual Baseline Assessment and Local Photoviewpoint Locations drawing, but on page 12 of the Illustrative Material, it faces the Sturt Farm development and therefore no harm from the proposal would result.

Photo viewpoint 10 is also not shown on the aforementioned drawing and it is unclear where it is taken from. Mention is made of a hospital access road, but it is neither that for Holy Cross Hospital, nor Haslemere Community Hospital. There are no other hospitals close to the application site.

Given that a Zone of Theoretical Visibility (ZTV) has not been undertaken, which is an important part of any landscape assessment / appraisal, Officers consider that the LVA is also deficient in this respect.

Additionally, it is the case that the assessment of landscape and visual effects should be undertaken for the operational phases of the proposed development, i.e. when it is built out and occupied, at year 1 (winter) and year 15 (summer). The differences with year 15 being that all vegetation is in leaf in the summer and the proposed planting would be taller in height than at year 1. For an unknown reason the submitted LVA uses a period of 20 years for the timeframe by which a level of mitigation can be achieved through planting. It can only be deduced that it would take longer for the mitigation planting to sufficiently establish so that the development would be adequately screened from view.

Table 6.23 in the LVA is considered to fail to factor in the building activity (built form and hard standings) and associated vehicular movements to and from the site during

working hours, including large delivery lorries and plant, in the 'Significance of Effect at Construction' column. No information has been submitted to demonstrate that the adverse landscape and visual impacts from this would be localised, minimised in terms of timeframe or that good working practices would be implemented.

The site is also defined as a 'Green Finger' by HNP Policy H11. This outlines that development proposals will only be supported where they otherwise comply with the policy implications of the relevant environment designations. These are set out in Table 5 and the site falls within the Sturt Farm (excluding the permitted development site) green space defined as "*part of an attractive landscape setting to the southern side of Haslemere and is rich in wildlife*". The relevant environment designations have been discussed in great depth above and given that the proposal fails to respect the undeveloped, open character of this Green Finger and its ecological and landscape contribution to its immediate locality, it therefore contradicts this policy too.

For the reasons given, it is considered that redevelopment of the site for residential dwellings would cause a moderate adverse impact on the AGLV and a major adverse impact on the National Landscape, also failing to conserve or enhance its landscape and scenic beauty. As such, the proposal would conflict with Policy RE3 of the LPP1, Policies DM1, DM4 and DM15 of the LPP2, Policies H1 and H11 of the HNP and Policies RT3, P1, P2, P3, P4 and P6 of the Surrey Hills Management Plan.

15. Impact on trees

Policy DM11 of the LPP2 outlines that development should adequately protect trees and hedgerows during all phases of development, including through providing adequate separation; provide suitable, preferably native, species for planting; and incorporate high quality landscape schemes, appropriate to the scale, nature, and location of the development.

Policy H9 of the HNP states that development proposals will be supported where they conserve, avoid damage to / loss of and enhance trees, hedgerows and woodlands of value. Where they are affected, a full site survey and a management plan should inform this. Appropriate protection measures should be in place prior to any work on site and throughout the development process. Opportunities for the restoration, enhancement or planting of trees, woodland and hedgerows should be identified and incorporated. Developments of 10 or more dwellings will be required to make appropriate provision for future management and maintenance of communal areas.

The private driveway to Longdene House is flanked by trees, which are the subject of Tree Preservation Order (TPO). It is noted that no trees are proposed to be removed and that any impact on nearby trees and their Root Protection Areas (RPAs) from the creation of the new access point are capable of being resolved by condition (had the application been otherwise acceptable). It is noted that the Council's Tree Officer raises no objections subject to conditions around tree protection and a detailed site-

specific Arboricultural Method Statement and pre-commencement inspection for the access creation.

As such, the proposal is considered to be in compliance with paragraph 136 of the NPPF and Policy DM11 of the LPP2 and Policy H9 of the HNP.

16. Impact on residential amenity

Policy TD1 of the Local Plan Part 1 and Policies DM1 and DM5 of the Local Plan Part 2 seeks to protect future and existing amenities for occupants and neighbours and ensure that new development is designed to create safe and attractive environments that meet the needs of users and incorporate the principles of sustainable development.

Policy H6 of the HNP states that proposals should protect the residential amenity of neighbours.

Objections have been raised to traffic, which could have an adverse impact on residential amenity. At this outline stage with all but access up for consideration, it is considered unlikely that the proposal would have an adverse impact on levels of sunlight, daylight and outlook to nearby dwellings, nor would it be likely to cause overshadowing, a loss of privacy, a sense of enclosure, or be overbearing. This is because of the distances involved with the closest neighbouring residential properties being to the southwest within the Longdene estate, to the northeast of the application site along Hedgehog Lane and the newly constructed houses at Sturt Farm to the north. Whilst Officers acknowledge that the proposed dwellings would have a greater presence upon the occupiers of these properties, they would be in excess of 50m away and at an oblique angle. Whilst the proposed layout is indicative, it demonstrates that the quantum of development proposed could be achieved on site whilst maintaining a good level of amenity for existing neighbouring occupiers. However, further judgment on this would be reserved for the detailed design stage.

The proposal would intensify development on the site and would result in an increase in noise and disturbance. However, this is not considered to be so significant that it would be detrimental to any of the surrounding occupiers.

The proposed site access would be off the private driveway. It is acknowledged that residential properties would increase the number of comings and goings by all means of transport along this, although a pathway is proposed to the eastern-most boundary of the site, but this is not considered to cause any particular issues for residents of Longdene House, The Lodge, the four approved dwellings to the rear of it, the recently permitted Pool House dwelling and the newly constructed Longdene Hall.

As such, the proposal would be acceptable in respect of its impact on the amenities of neighbouring occupiers in accordance with Policy TD1 of the Local Plan Part 1, Policies DM1 and DM5 of the Local Plan Part 2 and Policy H6 of the HNP.

Future Occupier Amenities

The Technical Housing Standards - Nationally Described Space Standard sets out nationally applicable minimum internal space standards to ensure that all dwellings benefit from an appropriate standard for all future occupiers. It is considered that all the proposed dwellings could exceed these space standards to provide an acceptable level of internal accommodation. In terms of external amenity spaces, the houses would all have large gardens and the eight flats would share a communal garden of 1168m². Shared between them, this would equate to 146m² each, much higher than the 20m² required by LPP2 Policy DM5. A shared amenity space for all the dwellings of 324m² would also be provided, but a Local Equipped Areas for Play (LEAP) is required for schemes of 10 dwellings and over such as this. It should be noted that this needs to be 20m x 20m, equivalent to 400m², and a minimum of 20m from the nearest habitable room façade of dwellings.

In summary, the outline proposal could have an acceptable impact on the amenity of existing and future occupiers, subject to further design work to form the reserved matters submission and conditions.

17. Biodiversity and compliance with Habitat Regulations 2017

NPPF paragraph 187 outlines that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

Paragraph 193 sets out the biodiversity hierarchy and that opportunities to improve biodiversity in and around developments should be integrated as part of their design. Paragraph 198 outlines that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Policies NE1 and NE2 of the Local Plan Part 1 and Policy DM1 of the Local Plan Part 2 states that the Council will seek to conserve and enhance biodiversity.

Development will be permitted provided it retains, protects and enhances biodiversity and ensures any negative impacts are avoided or, if unavoidable, mitigated.

Policy H12 of the HNP outlines that development proposals should result in a net gain for biodiversity; protect and enhance features of biodiversity interest of value; maintain appropriate buffer zones between new development and the green network; and provide new tree planting, Priority Habitats, wildlife friendly landscaping and ecological enhancements.

Further, Circular 06/2005 states *“It is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before planning permission is granted.”*

The submitted biodiversity and ecology checklist shows that broad-leaved woodland and mature hedgerows are present on or within 50m of the application site, and that the proposed works would affect existing buildings with timber cladding / weatherboarding within 200m of woodland, the deciduous woodland itself and grassland on or directly adjacent to the site. It also identifies that the development would cause the loss of green spaces of visual amenity and ecological value as well as damage to or loss of trees, woodlands and / or hedgerows.

An Ecological Assessment was submitted after the application had been registered. This has identified the likely absence of active badger setts within and adjacent to the development site. The two active setts closest to the site are approximately 230m to the southwest and 300m to the south. As such, Surrey Wildlife Trust’s recommendation that a site walkover is undertaken by a suitably experienced ecologist to check for badgers is not necessary at this point in time as this was carried out in October 2024. However, these are only valid for 12 months.

The hazel dormouse surveys undertaken on this site are dated 2013 and 2017 and are therefore out of date by eight years. Surveys up to three years old are acceptable if the habitats have not significantly changed. Given the lack of up-to-date hazel dormouse presence / likely absence surveys there is insufficient information to determine whether the application would have an acceptable - or adverse - impact upon them, which is sufficient to constitute a reason for refusal. It is important to note that hazel dormice are a Species of Principal Importance (SPI) and a European Protected Species, which are also protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended).

Bat roosts were confirmed as likely absent during the ecological surveys, but since they are highly mobile and move roost sites frequently, a precautionary approach to works should therefore be implemented. Opportunities to incorporate bat roosting features could have been secured by condition on an approval as could a Sensitive Lighting Management Plan to avoid light spill to bat commuting and foraging routes as well as the dark skies as previously identified.

Although limited in area, suitable habitat to support common reptile species was identified within the site. As such, appropriate mitigation is required to ensure their protected. A prior to commencement condition could have been added in the event of approval requiring a reptile precautionary method of working.

Any development activities such as demolition and vegetation clearance could be timed outside early March to August inclusive to avoid an adverse impact upon

breeding birds. Integral features to provide roosts / nests for breeding birds, including swifts, could also have been conditioned on an approval.

In respect of hedgehogs, integral design features such as creating gaps into all close-boarded fencing, creating a 'wild corner' with minimal habitat management and incorporating hedgehog homes into development should be designed in. These matters could have been achieved via a condition on an approval.

The ecological reports indicate the presence of two invasive, non-native species on site: *Rhododendron ponticum* and the *Cotoneaster* species. Therefore, it is important that an invasive species management plan is submitted prior to commencement of any works, which could have been a condition on an approval.

The woodland on site is classified as being lowland mixed deciduous woodland, which could be classified as a Habitat of Principal Importance (HPI), as with the native hedgerows. They would need to be assessed against HPI criteria. In the absence of this information, especially if they are a HPI, the proposal is contrary to NPPF paragraph 192 and Section 40 of the Natural Environment and Rural Communities Act 2006 because it has not been demonstrated that the development would not result in their loss or deterioration, or an adequate compensation strategy has not been presented. This equates to a reason for refusal.

The Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) legislation states that the statutory biodiversity metric calculation tool in spreadsheet form must be submitted as part of the Biodiversity Gain Plan to demonstrate the statutory biodiversity metric formula has been accurately applied. This should show the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value. Without this, a biodiversity net gain cannot be claimed.

It should be noted that because the development is not exclusively self-build or custom, consists of more than 9 dwellings and is on a site that has an area larger than 0.5 hectares, it is not exempt from BNG. However, outline planning permissions are subject to the biodiversity gain condition for a 10% net gain, but an approval of reserved matters is not as it is not a grant of planning permission.

It is recognised that for outline planning permission where landscaping and layout are reserved matters (such as this proposal), the implications for existing onsite habitats and the contribution to onsite gains may be uncertain at the time of the determination of the application. The proposed development would be phased as follows:

- Phase A: Construction of Units 01-08 (affordable housing)
- Phase B: Access to Units 09-14 (self and custom build)
- Phase D: Construction of Unit 10
- Phase E: Construction of Unit 11

- Phase F: Construction of Unit 12
- Phase G: Construction of Unit 13
- Phase H: Construction of Unit 14

At this stage it is not necessarily the case that the phasing will go from A to H in sequence.

For outline permissions that have the effect of permitting development which proceeds in phases, the standard approach for BNG may not be possible. The arrangements for approving the biodiversity gain plan for phased development requires an Overall Biodiversity Gain Plan (OBGP) being submitted to and approved by the LPA before any development can begin, and the same with a Phase Biodiversity Gain Plan (PBGP) for each reserved matter application before the development of that phase can begin. The OBGP is to confirm that there is a clear upfront framework for how the minimum 10% BNG is expected to be met across the entire development. Each PBGP would then set out a phase's contribution to BNG and confirm progress towards the overall biodiversity gain objective for the development once clear proposals for each phase have been developed.

The submitted Biodiversity Net Gain Report includes BNG Metric Headline Results as Appendix 1, but this is effectively a screenshot from the metric just showing part of the Headline Results sheet, missing off the on-site calculations. It shows that the trading rules (minimum habitat creation and enhancement requirements to compensate for specific habitat losses up to the point of no net loss) would be satisfied and that there would be a net gain in the habitat units of 33.26% and in the hedgerow units of 47.82%, however this cannot be verified without the whole metric.

As such, the proposal is contrary to the NPPF, Policies NE1 and NE2 of the Local Plan Part 1, Policy DM1 of the Local Plan Part 2 and Policy H12 of the HNP for the reasons given.

18. Impact on Highways & Transport

Policy ST1 of LPP1 outlines that development schemes should be located where sustainable transport modes can be maximised; should make contributions to the improvement of existing and the provision of new transport schemes that give priority to users of non-polluting vehicles; should be accompanied by Transport Assessments and Travel Plans; should comply with the Air Quality Action Plan; and should make appropriate provision for car parking.

Policy DM4 of LPP2 requires entrances to developments to be obvious for all users of the site, permeability and access throughout the site and active travel modes to be promoted. Policy DM9 of LPP2 promotes sustainable transport modes and patterns through developments providing inclusive, safe and convenient access for all; an adequate highway design and layout; access by service and emergency vehicles at

all times; adequate car and cycle parking spaces; public transport infrastructure; and them not having a severe residual cumulative impact on highway network capacity.

Policy H7 of the HNP requires that all new developments provide off-street car parking safe accessible on-site storage for cycles, safely located access for pedestrians, cyclists and non-motorised transport; and safe provision for electric car and bicycle technologies. Additionally, all major development should provide safe, direct routes for pedestrians and cyclists and make improvements to these accesses; provide a travel plan; and be designed to be accommodated satisfactorily in the local highway network.

As previously discussed, the site is in a highly sustainable location.

Access is the main highways-related consideration for this application. In terms of routes to the site, there is only one - via Hedgehog Lane, which then turns into Longdene Road that comes out onto the south side of Lower Street almost opposite Haslemere train station. The site is not accessible from public footpath no. 35 to the north. It is proposed to create a new vehicular access off the private driveway to the northeast of the existing one, which would also be utilised to form a loop. Car parking spaces, garages and the dwellings themselves would then be accessed off this internal street. A footpath is also proposed from this leading out of the site to its eastern-most boundary with Hedgehog Lane. This could have been conditioned had the application been found to be otherwise acceptable.

It should be noted that the road is already used as the access to the Longdene estate and whilst the proposal would intensify this, its use for the proposed development is not considered to be detrimental to existing or future users. As it is a private highway, the County Highways Authority have not raised any issues with its use for access.

However, it is important to ensure that the existing office use at Longdene House ceases prior to first occupation by way of condition. This matter in relation to traffic generation, which could be excessive in conjunction with the trips generation to and from the proposed dwellings if the property was not converted into a single dwellinghouse as has been approved. It is noted that this will take some time due to the nature and complexity of the conversion works. The CHA have agreed to the wording of the condition in this way.

The CHA's suggested conditions about space for vehicles to park and turn so that they may enter and leave the site in forward gear, cycle parking and layout of the common roadway and footpath would have been added to an approval with the proviso that they mentioned each specific plot in the phasing. A pre-commencement condition relating to a Construction Transport Management Plan would also have been added to an approval so the proposed development would not prejudice highway safety nor cause inconvenience to other highway users.

It is considered necessary and reasonable to have added a condition had this application been found to be otherwise acceptable requiring a Sustainable Travel Information Pack in line with local and neighbourhood plan policies.

As previously stated, 32 car parking spaces are proposed, but paragraph 3.26 of the Design and Access Statement states that each self-build plots will have 2.5 vehicular parking spaces when this is shown as four in the Schedule of Accommodation table. Notwithstanding this discrepancy, the maximum number of parking spaces allowed by SCC recommended guidance is a total of 20, although it may be appropriate to consider increased provision where space permits. In this location where it is a short walk to a train station and bus stops, it is considered appropriate to cap the number of parking spaces at 20. However, this could have been resolved at reserved matters stage and is not a reason for refusing this application.

The proposed development therefore complies with the paragraphs of the NPPF in this respect and with LPP1 Policy ST1, LPP2 Policies DM4 and DM9, and HNP Policy H7.

19. Climate Change & Sustainability

Policy CC1 of the Local Plan Part 1 seeks to support development which contributes to mitigating and adapting to the impacts of climate change, including measures that use renewable and low carbon energy supply systems.

Policy CC2 of the Local Plan Part 1 seeks to promote sustainable patterns of development and reduce the level of greenhouse gas emissions.

Policy DM2 of the Local Plan Part 2 states that all development should seek to maximise energy efficiency and reduce carbon emissions through its design, structure, orientation and positioning, landscaping and relevant technology.

The Council's Climate Change and Sustainability SPD (October 2022) is relevant.

The submitted Climate Change and Sustainability Checklist only states that most measures listed are to be considered / incorporated at the detailed design stage. It does, however, state that local sustainable materials are to be used; food growing spaces to be provided; green infrastructure is to be integrated into parking design; facilities for waste sorting, recycling and composting are to be provided; segregated active travel routes are to be provided as are safe, secure, visible, and convenient cycle and walking paths, cycle parking and charging stations for e-bikes.

The detailed design of the proposed dwellings, including sustainable construction and energy saving measures, would be considered further at reserved matters stage. These measures are supported in principle at this stage and further consideration can be given to additional items.

20. Drainage

Policy CC4 of LPP1 supports development where it addresses issues of flood risk through the application of Policy CC4, which requires sustainable drainage systems (SuDS) on major developments. There should be no increase in either the volume or rate of surface water runoff leaving the site. Proposed development on brownfield sites should aim to reduce run off rates to those on greenfield sites where feasible. There should be no property or highway flooding, off site, for up to the 1 in 100 year storm return period, including an allowance for climate change.

The site is within Flood Zone 1 and also has a very low chance of surface water flooding.

A Flood Risk Assessment & Drainage Strategy Report has been submitted. At outline stage this matter would need to be considered in more detail at the point of designing the layout and landscaping of the proposed scheme, but Officers welcome due regard having been had to it at this point.

Thames Water does not have any objection with regards to surface water drainage as long as the sequential approach to the disposal of surface water is followed. This is also the case for the water (including waste) network and sewage treatment works infrastructure capacity

21. Archaeology

LPP1 Policy HA1 outlines that the significance of the heritage assets, including archaeological sites, within the Borough are to be conserved or enhanced to ensure the continued protection and enjoyment of the historic environment.

LPP2 Policy DM25 requires an initial assessment of the archaeological value of any site exceeding 0.4 hectares to be submitted, potentially along with an archaeological field evaluation with any important archaeological remains left in situ protected or being subject to archaeological recording, formal reporting, publication and archiving in a suitable repository as part of a scheme of works.

Historically, this area has been used as pasture for a considerable time. An Archaeological Desk-Based Assessment has been submitted as an addendum to that previously submitted in 2016. There is no evidence of Roman settlement despite burial evidence from this period identified in Haslemere. Therefore, the archaeological potential is best described as low to moderate. However, as the area has not been previously disturbed it recommends that further work is required in order to clarify the archaeological potential of the site, especially in light of the breaking of ground for the foundations for the buildings, groundworks for new roads and landscaping. As such, an archaeological evaluation trial trenching exercise would have been required by way of a pre-commencement condition.

22. Human Rights implications

Consideration has been given to Articles 1 and 8 of the First Protocol of the European Convention on Human Rights. There are not considered to be any material impact on human rights from the proposal.

23. Equalities

Section 149(1) of the Equality Act 2010 provides:

- 1) A public authority must, in the exercise of its functions, have due regard to the need to—
 - a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Officers consider that the information provided by the applicant, together with the responses from consultees (and the representations made by third parties) do not result in the application giving rise to unacceptable material impact on individuals or identifiable groups with protected characteristics.

The proposed affordable housing would help to meet the needs of Waverley's lowest income households and the supported independent living housing is required for a range of groups, including those with complex needs, mental health issues, people with learning disabilities and autism, although the specific group for this proposal is yet to be decided.

Generally, the applicant has given consideration to a level approach, entrances with an accessible threshold, circulation, access to services and emergency egress for the new dwellings. It has been confirmed that inside the dwellings spaces would be designed to comply with Part M of the Building Regulations, such as corridor and door widths and positioning of switches and socket outlets for lighting in habitable rooms.

It is possible for an acceptable proportion of the proposed car parking spaces to be designed for those with mobility-related disabilities.

24. Community Infrastructure Levy (CIL)

Please be advised that the Waverley Borough Council CIL Charging Schedule came into effect from 1 March 2019; planning applications determined on or after this date may be liable to pay CIL. The site is within CIL Charging Schedule Zone A where the rate is £395 per m² for schemes of more than 10 dwellings.

As mentioned, the proposal is for a phased development and the submitted CIL Phasing Plan would have been secured by a condition requiring the development to be undertaken in phases in accordance with the plan unless any changes were approved in writing prior by the Local Planning Authority.

The Council provides an online calculator which can give an indication of the CIL charge payable on a CIL liable development. For further information please view the Council's CIL webpages (www.waverley.gov.uk/CIL) or contact: CIL@waverley.gov.uk

25. Conclusion / Planning Balance

The application would provide a minor, albeit important contribution to housing supply, which is given significant weight, although the presumption on favour of sustainable development, or the "tilted balance", does not apply because the proposal has a major adverse impact on the National Landscape thereby failing to conserve or enhance its landscape and scenic beauty, which is a strong reason for refusal. It would also have a moderate adverse impact on the Area of Great Landscape Value. Furthermore, there is insufficient information to determine the impact on hazel dormice and a Habitat of Principal Importance, and whether a biodiversity net gain would be achieved. This is not outweighed by the provision of eight affordable housing units and six self or custom build plots.

The planning balance assessment concludes that the proposal conflicts with the NPPF and the Local Development Plan and, as such, planning permission is recommended for refusal for the reasons outlined below.

Recommendation

That permission be REFUSED for the following reasons:

1. The proposal, by way of introducing built form on the site, would cause major adverse impact on the National Landscape and a moderate adverse on the Area of Great Landscape Value. As such, it fails to conserve or enhance their landscape and scenic beauty and this conflicts with Policy RE3 of the Local Plan (Part 1) 2018, Policies DM1, DM4 and DM15 of the Local Plan (Part 2) 2023, Policies H1 and H11 of the Haslemere Neighbourhood Plan (November 2021) and Policies RT3, P1, P2, P3, P4 and P6 of the Surrey Hills Management Plan (2020-2025).
2. The proposal fails to provide insufficient ecological and biodiversity net gain information. As such, the impact on hazel dormice and a Habitat of Principal Importance, and whether a biodiversity net gain would be achieved cannot be determined and this conflicts with Policies NE1 and NE2 of the Local Plan (Part 1) 2018, Policy DM1 of the Local Plan (Part 2) 2023 and Policy H12 of the Haslemere Neighbourhood Plan (November 2021).

Informative:

1. The drawing numbers and documents relevant to this decision are: 2186_001, 2186_002, 2186_003 A, 2186_004, 2186_005 B, 2186_011, 25009-1, An Addendum to the Archaeological Desk-Based Assessment, Arboricultural impact appraisal and method statement ref. 25009-AIA-PB, BS 5837:2012 Tree Survey Ref. PB/5837-24/10.14, Desktop Contamination Study ref. 114543/01A, Design and Access Statement ref. 2186_2.06_241216, Flood Risk Assessment & Drainage Strategy Report ref. LDH-BML-XX-XX-RP-C-0500 Rev P01, Landscape and Visual Appraisal ref. 1027.18/DOC 1/ISSUE 1, Landscape and Visual Appraisal Illustrative Material ref. 1027.18/DOC 2/ISSUE 1, Planning Statement, Statement on Geoenvironmental Desk Study, Transport Statement