



Reference **APP/R3650/W/23/3327643**  
Appeal on Midhurst Road

Dated 15 January 2024: Ver 2.0

While we appreciate the opportunity to submit this supplementary document for consideration by the Planning Inspector, Haslemere South Residents Association, which has an active membership of over 280 local Haslemere households is most concerned at not being able to represent themselves at the Inquiry to express our concerns and objections, as are the other 240 plus residents who were not also informed of the opportunity to appear at the Inquiry. It should be noted that with the planning stages over 400 objections and reiterated statements have been logged. We trust that despite not being able to make representation in person as we had hoped and intended, this statement will serve to underline the very great strength of public opposition to this major development.

The proposed development will have very substantial negative impacts on the local and wider area, as well as on local residents and is entirely contrary to national and local planning policies and principles.

With reference to National and Local Planning Policy, HSRA wish to submit the following summary of all the points raised by the community related to the appeal for the site on Midhurst Road.

- ◆ The NPPF (2023) clause 183 clearly states that when considering planning applications in AONB, permission should be refused for major development other than in exceptional circumstances. The recent case ruled by Justise Holgate set the precedence stating that the need for housing does not override the protection of an Area of Outstanding Natural Beauty (National Landscape). The NPPF (Intro #2) also clearly states that the legally adopted (NPPF #37) Haslemere Neighbourhood Plan (H-NP) carries significant weight. This is important as the Midhurst Road site was specifically excluded as it is on protected Surrey Hills AONB land and the site is entirely outside the approved defined Settlement Boundary (H-NP Clause H1). Several committee members of the HSRA helped develop the Neighbourhood Plan with the intention of maintaining the best community environment while retaining the valuable national landscape which surrounds Haslemere, whilst ensuring the required housing is provided; in the required format; in the right places (NPPF #67). The proposed planning application is contrary to Local Plan Policies SP2, RE1, RE3 and Local Plan Part 2 (valid until 2032) policies PF2, DM11 and DM15.
- ◆ HSRA raised concerns with Waverley BC at the planning stage over the inclusion of the Scouts and Forest School which only formally became apparent when the hybrid application was in the public domain. The concept was circulated earlier but not defined. The hybrid application must be determined on the benefits of the development over the loss of the Area of Outstanding Natural Beauty and the introduction of emotive components should be excluded. HSRA enquired about the Scouts claims of a 'homeless' status to Waverley Borough Council to determine the reality of the Scouts position. It transpires the Scouts do in fact have a secure tenancy in their current building, and do not have a pressing homeless status. This item should therefore not be considered as an exceptional circumstance under Clause 183 in the NPPF. The same principle applies to Grayswood Forest School, a private business including a forest school that currently owns its own site in Grayswood.

- ◆ The drinking water situation in Haslemere is now at a critical stage as the current Blackdown reservoirs do not have the capacity to support Haslemere as it is today. The Thames Water statement in August 2022 stated it only has capacity for 49 houses, but with the current build rate this capacity has already been exceeded. As an indication that demand is already outstripping supply, HSRA members have recorded substantial numbers of water bowzers topping up the Blackdown reservoir to maintain water supplies, this is before any further building occurs. Water supplies to the area have been shutdown on several occasions over the past few years plus Haslemere Hospital is on the same circuit and has required its own bowser deliveries. Vehicles were recorded on the 19<sup>th</sup> November 2023 even after substantial rainfall, topping up the reservoir. Thames Water stated at a meeting attended by the local MP Jeremy Hunt, that substantial investment over a period of many years is required to resolve the Haslemere water issue- with very significant changes being required to the network. This is not on the Thames Water agenda as of 2023. The issue of lack of viable water supply, coupled with lack of sewage capacity and the polluting impact of sewage outflows into the local River Wey indicates that Thames Water is not sustainably able to service the local community currently. This situation needs to be urgently addressed now, before the existing new developments are completed, and certainly before a major development as being considered at this Inquiry can be considered.



Water bowser heading up Chase Lane on 19th November 2023

The flooding of the immediate local area has become severe in the area with many blocked roads. The rainfall coupled with the climate shift is cause more severe rain volumes.

The junction of Scotland Lane and Midhurst Road was again flooded for days from 4<sup>th</sup> January 2024 with the persistent broken-down flooded car, showing the level of water. The current Scotland Park (Phase One), is already exacerbating the run-off with regular muddy water streaming down the lane and the proposed building on the steeply sloping



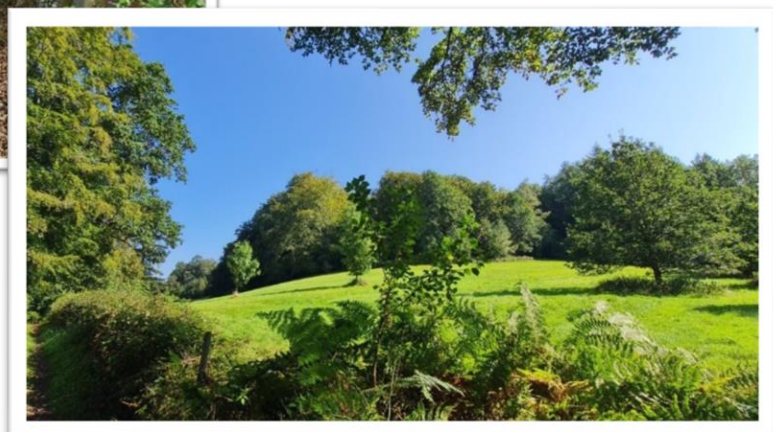
The sea of mud heading down Scotland Lane (4th Jan 24) & resultant flooded car

AONB fields between the Midhurst Road and Scotland Lane will further exacerbate the problem of flooding in this area. The flooding problem (Status Red) was highlighted by the Atkins Environmental Report commissioned by Waverley when the land was first surveyed, but does not appear to be included in the current submission.

- ◆ The ecology and eco-network of the area has already been upset by the current local developments with the displacement of many residential wildlife species. These vital and protected species have migrated into both the local gardens and on to the remaining Red Court area and we now see evidence of mice, deer, slowworms and badgers residing along the Wildlife Corridor officially designated and recorded within the Haslemere Vision & the Haslemere Neighbourhood Plan, which runs parallel to Midhurst Road. This Wildlife Corridor is protected by the historic public footpath NP 597. To provide an alternative route for wildlife once the current Wildlife Corridor has been disrupted the developer is proposing a small mammal “tunnel”. However, this lacks credibility as the sandy soil found in this area would immediately block any such tunnel, and in case would not help larger mammals such as deer and badger as they would have to cross the proposed major access road. Additionally, the lighting of the access road which would further harm the protected national landscape and would have a demonstrable impact the wildlife and impact the H10 high quality dark skies over the site and the SDNP.



Wildlife corridor and historic and well-trodden footpath FP597

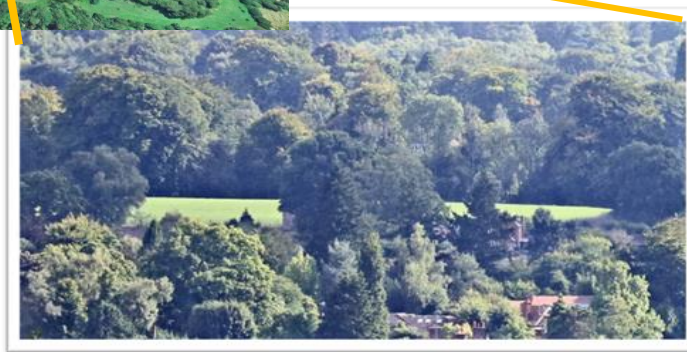


- ◆ The impact on the ANOB has already been noted by Natural England, Surrey Hills ANOB, CPRE and additionally in November, the Surrey Wildlife Trust. The proposed development would cause demonstrable damage to the natural landscape (AONB) and will have a wider negative impact on the town and surrounding Green Belt areas. It should be noted that the site can clearly be seen from Hindhead, Gibbet Hill, which is not mentioned in the disclosure.



The green band of the AONB grass land (the proposed site) nesting in the woodland viewed from nearby Gibbet Hill, Hindhead

[ OS 51.1155, -0.71576] (September 2023)



Additionally, the community is most disturbed by the potential destruction of the canopy along the Midhurst Road which sets the scene for the ANOB entering or leaving Haslemere. The initial development required the destruction of over 600 healthy and mature trees. The proposed new junction is simply to allow access to the AONB and requires an additional 100 trees to be pointlessly felled - this is against National and Local climate and ecological sustainability policy.



Looking north along the AONB canopy over Midhurst Road at the proposed junction point

- ◆ Concerns are raised by professional ecologists and HSRA members regarding the proposed SANG. The plans appear to show that the SANG is the same area as the allocated Scotland Park Phase One SANG. As the current SANG area proposed already hosts a wide diversity of wildlife, our member experts cannot foresee how any positive Biodiversity Net Gain (BNG) can be established. Our expert, an academic with BNG expertise, raised this issue and determined the BNG to in fact be negative. This is against the Defra biodiversity statements.

Residents have witnessed some of the mitigation measures already in place and raised concerns about the accuracy of the appellants environmental impact statements. Confidence in the ecological assessments and claims have been further called into to question by ecological mitigation measures put in place by the developer. For example the new dormouse houses are incorrectly orientated and mounted, an issue identified by members of the Haslemere Vision (Neighbourhood Plan) biodiversity wildlife corridor mapping team.



Resident Dormouse pictured on the Red Court site



Houses mounted wrong way round which is **Dangerous** to Dormouse



Extract from submitted Documents with blue overlay from

SANGS Plan - Map2\_Proposed\_SANG Boundary Aerial P2109\_1669\_010622.pdf

It has also been noted by the HSRA ecology experts that the current boundary planting which apparent protects the AONB has invasive and non-indigenous (Laurel, Leylandii) shrubs and this is surrounded by a 2m wire fence which has trapped seven (7) deer to date which featured in the local paper as cruelty. The fence has remained in place.



- ◆ The road safety of the proposal is generating great concern within the community. A local resident highways expert raised serious safety concerns that the speed traffic bars placed on Midhurst Road are too close to a junction where the traffic will naturally slow down giving artificially low traffic speeds and giving a false picture of the true safety of the proposed new junction. HSRA members carried out their own speed check and the traffic light at the proposed junction point at 200 metres from the "Coomers (A286 & the A287) junction" that the average speed is over 15 mph faster. Whereas this data has not been formally verified, the discrepancy is too large to be ignored. With road safety high on the agenda, especially with a very serious pedestrian accident on Boxing Day 2023 (3 weeks ago) on the Midhurst Road, independent speed tests should be carried out before any permission is granted. HSRA raised this safety concern in the public domain and received a legal rebuttal from the developer without any factual retort.



Location of ATC unit November 2022 to February 2023

Images of the ATC unit just 34 meters from the Scotland Lane Junction.  
For reference the location GU27 2PT Midhurst Road Haslemere.

OS Ref 51.08304850974325, -0.7198394935843352  
Distance from Speed Counter to Scotland Lane Junction: **34 meters**  
Images of the ATC unit just 34 meters from the Scotland Lane Junction.

Yours truly

Howard Brown  
On behalf of Haslemere South Residents Association

Haslemere South Residents Association [haslemeresouthra@gmail.com](mailto:haslemeresouthra@gmail.com)  
HSRA has **288** confirmed members, 2 Jan 2024

HSRA c/o 8 Scotlands Close  
Haslemere Surrey  
GU27 3AE