

WEST HORSLEY NEIGHBOURHOOD PLAN

REGULATION 14 REPORT: OCTOBER 2017

Purpose

1. The purpose of this report by O'Neill Homer is to summarise the outcome of the consultation period on the Pre Submission West Horsley Neighbourhood Plan (WHNP) held for the statutory 6 week period between 12th June and 4th August 2017. This report makes recommendations on how the WHNP should proceed in the light of representations made. It will be published by the Neighbourhood Plan Steering Group on behalf of the West Horsley Parish Council, the qualifying body for the West Horsley Neighbourhood Plan.
2. During the consultation period there were representations made by local people, by the statutory consultees, developers/landowners and by other local and interested organisations.
3. The responses have been reviewed and analysed by the Steering Group and its summary of those responses and the changes to the plan that result are tabulated and available in the Consultation Statement. The statement will accompany the submitted WHNP in due course, in line with the Neighbourhood Planning (General) Regulations 2012 (as amended).
4. This report summarises those representations on the Pre-Submission Plan by the statutory consultees, developers/landowners and other interested organisations and the extent to which the proposed land use policies meet the basic conditions as required by the Regulations.

Consultation Analysis

5. The local planning authority, Guildford Borough Council (GBC), has provided formal comments. The Steering Group has been in regular dialogue with the Borough during the preparation of the plan including sharing an early draft for their informal comments. GBC make no statements on the plan in terms of potential risk of not meeting the 'basic conditions' but set out a number of observations in relation to their updated evidence base, supporting text and suggestions on how policies may be improved. These issues relate principally to:
 - Advice on updates to the Local Plan Policies Map and evidence base namely: West Surrey Strategic Housing Market Assessment 2017; Open Space Sport and Recreation Assessment 2017; and 'Borough Overview Map' (2017 version).
 - Request appropriate copyright information is provided on all maps and images.
 - WHNP Section 2 – Seeks further clarification to the approach taken to measuring residential densities.

- Policy WH1 – Seeks clarity in that the policy could go further to explicitly promote high quality design.
 - Policy WH2 – Objects to clause (iv) and provides examples where through minor amendments additional clarity could be provided to policy clauses. The principle objection to the current drafting of clause (iv) is that it lacks flexibility by restricting enlargement of single storey dwellings. GBC state this may be unenforceable. They also suggest amendments to supporting text in relation to clause (x) off-street parking in order to assist decision makers.
 - Policy WH3 – Objects to clause (v). Objection is as WH2 above. They also provide suggestions to help to clarify the boundary to which the policy applies.
 - Policy WH4 – Objects to clause (ii). Provide clarity that ‘Starter Homes ’are not yet defined as affordable homes and fall outside the GBC’s housing priorities.
 - Policy WH5 – Seeks clarity: GBC provide extensive and helpful comments to provide greater clarity to the policy; the method by which viability is assessed, and the mechanism by which GBC assigns rural exception housing.
 - Policies WH6 to 10 - No comments.
 - Policy WH11 – As landowners, they object to inclusion of Local Green Space Site 6: Farleys Close.
 - Policy WH12 – They provide detailed comments on how the mapping that supports the policy needs to be justified & improved, and the Policies Map amended accordingly. They confirm they will pursue an objection at examination should those areas of the proposed green infrastructure network that lie within the boundaries of their proposed strategic site allocations not be reconciled as routes (corridors) rather than areas of land.
 - Policy WH13 – Advice. The GBC Water Quality technical study due to be published imminently may make the requirement of this policy superfluous.
 - Policy WH14 – Suggest clarity by making minor amendment to the policy wording to provide clarity to developer requirements.
 - Policy WH15 – No comments.
6. Surrey County Council in their role as Education and Highways Authority acknowledges the terms of Policy WH7 (Educational Provision) but suggest the policy or supporting text could be amended to explicitly reflect the importance of location and accessibility for pupils. The Highways Authority question the inclusion of Local Greenspace sites LGS10 to 15 in policy WH11.

7. Surrey County Council Heritage Conservation team provide references to the resources they have available in support of neighbourhood plan groups, principally the Historic Environment Record.
8. The Environment Agency make no substantive comments but direct the Steering Group to their published advice on neighbourhood planning.
9. Natural England (NE) confirm the proximity of the Surrey Hills AONB and suggest all new development within the setting of the AONB is required to undertake a Landscape and Visual Impact Assessment. NE also remind the Parish Council of their duties under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and National Planning Policy in relation to Policies WH12 and 13 and suggest inclusion of a new project in the Implementation section of the plan to create and enhance wildlife corridors using the funding mechanism provided by the Community Infrastructure Levy (CIL).
10. Punch Taverns object to inclusion of Site 4: The Barley Mow Beer Garden as a Local Green Space designation.

Summary of Community Comments

11. In overall terms, few adverse comments were received in respect of many of the policies contained in the Pre-Submission Plan. Many helpful comments were received in relation to minor factual errors in both the Plan and Supporting Documents. Details of the full representations made to the Pre-Submission Consultation by the community have been tabulated in the Consultation Statement and the responses analysed.
12. While there were many positive comments received on the Plan - not least the need for the retention of Educational Provision in the Parish and the terms as set out in Policy WH7 - many local people continue to have strongly held views on the emerging Guildford Local Plan and the level of growth it proposes in the Parish, that they feel is unsustainable. It is not for the Neighbourhood Plan to challenge the proposals in the emerging Guildford Local Plan, but to address the scenario of them being implemented in whole or in part.
13. Three common themes were evident in the responses. First, an apparent misunderstanding regarding the siting of a War Memorial and the role that Policy WH11 (Local Green Spaces) may play in this. Second, a significant number of responses challenging the quantum of development proposed in the emerging Guildford Local Plan which they consider is inappropriate for West Horsley. Third, a number of respondents suggesting the neighbourhood plan should play a role in decisions affecting the Green Belt and its boundaries.

14. These objections are noted, and in the case of the War Memorial, it is recommended that the Plan clarifies its position. Regarding the latter two matters, the neighbourhood plan is extremely limited in its influence on 'strategic' housing matters, nor can it play a role in determining Green Belt boundaries or assessing the Parish against the five Green Belt purposes. These are strategic planning matters that can only be addressed by Guildford BC.

Modifying the Pre Submission Plan

15. Details of the full representations made to the Pre-Submission Consultation and the resulting changes made to the Submission Plan are tabulated in the Consultation Statement.

16. No comments received that challenged the 'general conformity' of the plan as a whole, and hence the ability of the plan to meet the 'basic conditions' required to 'make' a neighbourhood plan. In general terms there is a need to make targeted modifications to the policies, supporting text, and policies maps and to supplement the technical evidence base to provide additional justification for the soundness of policies, particularly in relation to housing density.

17. Guildford Borough Council has directed its comments to these matters and the justification for the green infrastructure network, as these are likely to have the greatest implications for proposals coming forward in the new Local Plan. Addressing these matters will help to strengthen the policies and confidence in them to ensure they achieve their policy aims.

18. The following policy modifications and additional justification are recommended prior to submission of the Plan to GBC:

- I. Accommodate all GBC suggested minor amendments to policy clauses
- II. Note GBC objections and update/revise policies and evidence base accordingly to reflect GBC response to paragraph 3.13, 3.19, 3.21, 3.36, 3.41
- III. Policy WH1: Amend clause (ii) to reflect the need for high quality design
- IV. Policies WH1 – 3:
 - a. Incorporate the requirement for a Landscape and Visual Impact Assessment within Design Management policies in the southern half of the parish, particularly within WH3, but also in other design management policies if proposals are within the setting of the Surrey Hills AONB.
 - b. WH2 (iv) & WH3(v): provide further supporting evidence to justify retention of 'single storey' requirement in WH2 and resistance to small homes being replaced with larger single dwellings in WH3.

- c. Residential Densities - Check densities ranges indicated by GBC, review density ranges and update Density Background paper accordingly and revise density in policies where necessary.
- V. Policy WH4: Update with reference to suggestions in GBC para 3.21 and 3.22. noting in the supporting text that the [Housing White Paper](#) confirmed that the government will not introduce a statutory requirement for Starter Homes "at the present time".
- VI. Policy WH5: add text on viability in GBC para 3.24 to supporting text of policy. SG to review options on defining Local Connection (para 3.25 and 3.26) and amend plan accordingly. Add a 'Local Connection Statement' to the Appendix to be read in conjunction with policy.
- VII. Policy WH7: Update policy in line with Surrey CC expectations for locations of new schools.
- VIII. Policy WH11: Further justify inclusion of Farley's Close as a Local Green Space. SG to review and if necessary update the LGS report (Document 5) to ensure the report clearly demonstrates the value of this land to the local community and how the NPPF tests have been met. Review options for suggested re-provision of greenspace nearby, and discuss concerns with GBC prior to Submission.
- IX. Policy WH11: Retain LGS sites 10 – 15 and delete Barley Mow Beer Garden. Review SCC highway objections and either delete these sites for the reasons stated in the penultimate paragraph of their submission or discuss with SCC an alternative approach to achieving the policy aim.
- X. Policy WH12: Review wildlife corridors proposed in conjunction with Surrey Wildlife Trust and update mapping and description to provide a clearer indication of corridor boundaries (noting comments in GBC para 3.41)
- XI. Policy WH13: Update policy and supporting text at para 5.64 with reference to the GBC Water Quality Assessment Stage 2 Final Report (October 2017).
- XII. Policy WH14: Add "all development results in a biodiversity net gain for the Parish" to the policy wording and add a 'Section 40' statement to the supporting text. The SG are recommended to review policies BEN NP27, 28 and 29 and 30 of the Benson Neighbourhood Plan which Natural England consider to be exemplar policies and modify the WHNP if required. (Note: the Submission Plan cannot contain new policies).
- XIII. Update Implementation section to include CIL Wildlife Corridor project.
- XIV. Policy Maps: Update as necessary based on above amendments.

XV. Schedule of Evidence and Appendices:

- a. Update as necessary
- b. Incorporate relevant new references including to Surrey Historic Environment Record and their mapping of local archaeological designations and other resources.
- c. Reference in design management policies or supporting text as appropriate.

Recommendations

19. It is recommended that:

- I. The policies and supporting text are amended subject to the comments made in respect of policies outlined above, and as set out in detail in in the Consultation Statement.
- II. The WHNP is finalised for submission for examination, subject to the completion of a Basic Conditions Statement and the Consultation Statement.

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