
Neighbourhood Plan Comments

Respondent	ID	Comment	Attachments
	WHNP/ 10	<p>Overall, I am hugely supportive of the WHNP. It highlights all the major issues affecting the parish.</p> <p>Comments related to 4._WHNP_Consultation_Statement_October_2017_Rev_A</p> <p>Most of this document reflects my views, especially D 19 and D 24ii.</p> <p>However:</p> <p>The last point of D 15 is unrealistic. Housing should not be reserved for local people. The objective should be to encourage a mixed, diverse community.</p> <p>Point D16 impacts (by my calculation) 115 people, a tiny fraction of the overall community. Lowering the cost of living in Horsley will simply shift who migrates where. It will not suddenly mean that those working in Horsley could live in Horsley.</p> <p>Comments related to 2._WHNP_Submission_Plan_October_2017</p> <p>3.5, 3.6, 4 and 5.1</p> <p>The Local Plan's proposed ~25% increase in housing stock will not only significantly impact the character of the village (in my opinion in a severely detrimental way), but also break the already strained infrastructure. The current infrastructure needs to grow just to catch up with the existing population. Any further developments need to account for the changing demographics of the community and the need to fund all infrastructure (including public transport) in line with housing and business growth.</p> <p>4.5 & 5.1</p>	

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		<p>The only reason “Residents tend to only occasionally use cycles in West Horsley as a means of transport” is because there are limited cycle lanes that offer safe travel. For example for anyone in East Horsley or West Horsley to get to the Raleigh School, they need to travel on relatively narrow main roads; The Drift, Oakham Road, or East Lane. My wife would love to cycle with children into the village, but is too afraid of traffic, especially with young children in tow. I use a cycle daily to commute to the train station and I am sure more would if they felt safer.</p> <p>5.8</p> <p>I hope the ethos related to “maintaining the character of the village” is not viewed as meaning the houses need to be a copy of existing designs, but allow continual evolution that is sympathetic to the mixture of housing design styles that already exists – in some cases allowing for progressive bolder changes, as has been done over the decades.</p> <p>5.39 (Policy WH5)</p> <p>I can’t conceive how “affordable housing for people with a local connection” would work, and I am uncomfortable with the idea on two fronts; Firstly it gives preferential treatment to individuals by birth (access to properties that an equally or better able person who does not have a local connection is unable to access) and secondly, depending how it operates, that it sounds like a golden handcuff that will prevent someone being able to sell their home unless it is to another local person...</p> <p>5.44</p> <p>The Raleigh School (and the Howard) must expand. The teaching team there have done an exemplary job in achieving an Outstanding in all areas OFSTED report rating, despite cuts in funding and limited space for a growing population of children.</p> <p>5.82</p> <p>It is great that the WHNP have raised issues such as light pollution as part of the Plan. In addition to the points raised, there are some very simple solutions already in use that reconciles the needs of safety and protecting Dark Skies; the lights on the steps down from Horsley station to Ockham Road South remain off until infrared triggered by pedestrians.</p>	

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		<p>6.4</p> <p>As well as this brilliant summary of where investment is needed, as the population increases, there is also a need for South Western Railways (and any future franchises) to provide more trains to support the increase in passengers (at every stop).</p>	
Surrey Wildlife Trust	WHNP/11	<p><u>To whom it may concern:</u></p> <p>Thank you for this opportunity to comment on the emerging West Horsley Neighbourhood Plan. Please consider these representations as those of the Surrey Wildlife Trust, and also submitted on behalf the Surrey Nature Partnership. Please note that the corresponding officer (see below) is also a Parish Councillor for West Horsley, in a non-professional capacity.</p> <p>Where we suggest improvements to the clarity, expression or accuracy of text within the document, these are simply indicated as a re-draft in red font. Our comments are as follows;</p> <p>1. The Neighbourhood Area</p> <p>para. 2.10. SNCI - Site of Nature Conservation Interest = <u>Importance</u>.</p> <p>1. Vision, Objectives & Land Use Policies</p> <p>para. 5.1 Key Objectives. The key objective “<i>The protection and enhancement of valued environmental assets, biodiversity, key views and landscape features</i>” is welcomed.</p> <p>Policy WH2: Design Management within Village Settlement. We welcome this policy especially in respect of (x.) “<i>Where appropriate, the provision of ‘pocket parks’ and natural green spaces for wildlife should be included</i>”.</p> <p>Policy WH11: Local Green Spaces. We welcome the informed and well-reasoned use of this designation.</p>	

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		<p>Policy WH12: Green and Blue Infrastructure Network. We welcome this policy, but suggest the following slight amendments.</p> <p><i>“Development proposals on land that lies within or adjoining the Network will be required to demonstrate how they maintain or enhance <u>its</u> visual characteristics and biodiversity; and to ensure their landscape schemes, layouts, access and public open space provision and other amenity requirements (such as pedestrian and cycle connections) <u>contribute to improving</u> the connectivity <u>and</u> maintenance improvement of the Network.</i></p> <p><i>Proposals which enhance/maintain the existing Green and Blue Infrastructure Network will therefore be supported.”</i></p> <p>para. 5.62. <i>“West Horsley’s Green Infrastructure consists of ancient woodland, woodland, hedgerows and open spaces. This Green infrastructure is crucial to the maintenance and protection of the rich biodiversity and wildlife of which the Parish has extensive assets..”</i>; is welcomed.</p> <p>para. 5.67. Concerning the identification and protection of Wildlife Corridors, is welcomed.</p> <p>Policy WH13: Sustainable Urban Drainage. We welcome this policy, especially in respect of the intention to protect aquatic biodiversity.</p> <p>Policy WH14: Biodiversity. We especially welcome this policy, but suggest the following slight amendments.</p> <p><i>“Development proposals must <u>seek to preserve</u> and enhance the natural environment by ensuring the protection of local biodiversity assets, <u>including all</u> UK Biodiversity Action Plan Priority <u>habitats</u>; and <u>by providing</u> the provision of additional <u>Priority</u> habitat resources for wildlife <u>in the form of new or expanded natural open green</u> spaces for the community.”</i></p> <p>para. 5.77. <i>“West Horsley is home to a variety of legally protected wildlife species, including the Hazel (or Common) Dormouse, the Great Crested Newt and several species of bats. It also hosts a wide range of reptiles, other amphibians and mammals, birds, butterflies and other insects, as well as an interesting flora, including wild orchids and further rare woodland species.”</i></p> <p>paras. 5.78-80, are all welcomed.</p>	

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		<p style="text-align: center;">1. Implementation</p> <p>para. 6.4, in respect of Wildlife Corridors; <i>“Proposals and projects which create and enhance wildlife corridors. The Parish Council will work with Surrey Wildlife Trust and Natural England to enhance these assets and to secure funding for their long-term management and maintenance.”</i> We welcome and support this intention.</p> <p>We hope these comments are useful.</p>	
Environment Agency	WHNP/12	<p>Dear Sir/Madam</p> <p>West Horsely Neighbourhood Strategic Environmental Assessment Screening and Plan Regulation 16 consultations</p> <p>Thank you for consulting the Environment Agency on the Draft Neighbourhood Plan for West Horsely.</p> <p>We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.</p> <p>Based on the environmental constraints within the area, we have no detailed comments to make in relation to your Plan at this stage. However together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning. This sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</p> <p>The Local Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and</p>	<p> EA response - West Horsley NP reg 16_Redacted.pdf (137 KB)</p>

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		<p>sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites.</p>	
Thakeham Homes	WHNP/13	<p>Dear Sirs,</p> <p>West Horsley Neighbourhood Plan Submission Version (Regulation 16) – Representation Re: Land at Manor Farm, West Horsley</p> <p><u>Introduction</u></p> <p>Thakeham Homes Ltd are submitting representations to the West Horsley Neighbourhood Plan as local stakeholders. Thakeham are a house builder based in Sussex with a track record for delivering high quality, sustainable schemes across the South East. We are progressing a number of potential development sites within the Guildford Borough at varying stages of the planning process.</p> <p>These representations are submitted in respect of Thakeham Homes’ interest at Land at Manor Farm, West Horsley (‘the site’). The site is also known by Guildford Borough LAA reference 15, and comprises the proposed strategic allocation ‘Policy A38: Land to the west of West Horsley’ in the emerging Guildford Local Plan. The Submission Guildford Local Plan was submitted to the Secretary of State for independent examination in December 2017 and the examination is programmed to commence in June 2018.</p> <p>We wish to support the progression of the West Horsley Neighbourhood Plan (WHNP) and its endeavours to align the neighbourhood plan with Guildford’s emerging Local Plan. These representations therefore specifically relate to the role of the emerging WHNP and its proposed policies in the delivery of residential development.</p>	<p> Thakeham Homes Representation_Redacted.pdf (124 KB)</p>

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		<p>Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Act 2004 provides the basic conditions which a neighbourhood plan must meet prior to proceeding to referendum. These are as follows:</p> <ul style="list-style-type: none"> • Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan; • The making of the neighbourhood plan contributes to the achievement of sustainable development; • The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority. • Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. <p>We consider that some standards and requirements stipulated in the proposed policies are unjustified, and the WHNP should demonstrate how these conform with national policy and guidance. Where there is insufficient evidence to demonstrate a requirement for such policies these should be deleted from the neighbourhood plan.</p> <p><u>Policy WH3: Design Management in Rural Areas</u> The Basic Conditions Statement which has been published alongside the submission WHNP details that Policy WH3 conforms with Paragraphs 58, 59 and 109 of the National Planning Policy Framework (NPPF). However, in our view the policy is overly prescriptive in parts, thus not according with paragraph 59 of the NPPF. Part V of the policy dictates building materials should include the significant <i>'use of red brick and clay tile hung elevations and plain clay terracotta roof tiles'</i>.</p> <p>Whilst we appreciate the need to ensure that new development responds to the local vernacular, in our view the requirements could be less prescriptive to accord with paragraph 59 whilst still ensuring that new development reflects local character. In our view part v of Policy WH3 should be deleted.</p>	

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		<p>WH3 also stipulates a requirement <i>'For any development of 10 or more dwellings, within the 5km Zone of Influence of the Thames Basin Heaths Special Protection Area, the development will only proceed once appropriate Suitable Alternative Natural Greenspace has been provided and approved (see Policy NRM6 of The South East Plan)'</i>.</p> <p>Mitigation requirements for Special Protection Areas are enshrined in National and Local Policy, in our view this paragraph of Policy WH3 is surplus to requirement and should be deleted.</p> <p><u>Policy WH4: Housing Mix</u> In our view clarity needs to be provided in relation to the flexibility of this policy, housing mix policies need to be flexible to adapt to change over the plan period. Further flexibility would ensure that this policy accords fully with the intentions of Draft Policy H1 of the Emerging Guildford Local Plan.</p> <p><u>Policy WH13: Sustainable Urban Drainage</u> Policy WH13 stipulates sustainable drainage requirements for new developments, detailing a requirement for development to incorporate 1 or more of 4 features listed as part of the drainage strategy for a new development.</p> <p>Paragraph 103 of the NPPF places a requirement on new development to ensure Sustainable Drainage Systems (SuDs) are incorporated into new development to ensure that problems do not arise as a result of developments for existing residents.</p> <p>In light of national policy requirements, we do not consider it appropriate for neighbourhood plan policy to prescribe SuDs design.</p> <p><u>Conclusions</u></p>	

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		<p>As you will note, we do not have significant concerns with the WHNP and it is clear that significant endeavours have been made to ensure that the plan compliments both national policy and emerging local policy, and we would therefore like to support the progress of the WHNP.</p> <p>We do however have concerns regarding the prescriptive nature of some of the policies proposed within the WHNP, and we have discussed those which we consider relevant to our land interest within these representations. In our view these policies should be reviewed to ensure conformity with national and local policy whilst providing flexibility to allow these policies to adapt the change over the plan period.</p> <p>We trust that these representations will be useful and clear and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.</p>	
	WHNP/ 2	<p>I have read the submitted West Horsley Neighbourhood Plan and am happy with its proposals.</p> <p>[Name and address redacted]</p>	
	WHNP/ 3	<p>With regards to the submission version; List of Land Use Policies; WH8; Local Buildings of Historic Interest, page 36:-</p> <p>1. i) Champney Cottage, Cranmore Lane</p> <p>What is the basis for this property being included here?</p> <p>It is not visible to the village, neither the external appearance or internal structures are of historical interest as the house has evolved over the years into a more modern house and the garden has no significant historic plants or structures contained within it. Has any contributor or author of this report actually been to the property?</p>	

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		<p>We would formally ask that the property be removed from the list.</p>	
	<p>WHNP/ 4</p>	<p>I broadly support the West Horsley Neighbourhood Plan, but make 2 points:</p> <p>1. Policy WH11 Local Green Spaces</p> <p>This should include Green Lane and Green Lane West as they are both "green ribbons" comprising single carriageway lane or rough track largely with attractive views of fields or woodland on each side and immediately edged with wide verges comprising a variety of mature trees, and with a drainage ditch on one side of Green Lane. These are both actively used as a green corridor by wildlife, plus recreational walkers, runners, dog walkers, cyclists and horse riders particularly from the nearby stables. In addition Green Lane provides a means of making a desirable circular walk combined with Long Reach and Bens Wood or the path between the riding stable fields. Vehicular access is only needed in Green Lane for the residents there.</p> <p>2. Policy WH13 Sustainable Urban Drainage</p> <p>Insufficient weight is given to the problem of surface water in Green Lane particularly the lower part where it joins Ockham Road North, ie the section lower than one of the access points for a proposed development site labelled A40. This is despite the presence of a drainage channel in Green Lane. See the attached brief video taken in August 2017 following one summer shower and a photo too. Note too the run off of earth into the Lane. Surface water run off from a new development would drain to the residential properties on the corner of Green Lane and Ockham Road North, so it is essential to take decisive steps in the planning process to require developers to prevent future flooding and for ever more maintain such provisions, particularly bearing in mind climate change.</p> <p>This household has direct local experience of these situations within West Horsley.</p>	<p> Green Lane West Horsley 5117.297'N, 026 (1).jpg (5.9 MB)</p> <p> Green Lane West Horsley 5117.297'N, 026 (1).3gp (48.4 MB)</p>

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	WHNP/ 5	<p>I fully support the West Horsley Neighbourhood Plan.</p> <p>In particular I would draw attention to page 32 and Policy WH5: Rural Exception Housing. This defines clearly that affordable housing should only be allowed where there is an appropriate mechanism to ensure that the home remains as affordable housing for people with a local connection IN PERPETUITY.</p>	
Effingham Parish Council	WHNP/ 6	<p><u>Effingham Parish Council would like to make the following Consultation response:</u></p> <p><u>(page 17) 4.5</u></p> <p>The broad conclusions drawn from the survey responses were as follows:</p> <p>Bullet point: <i>West Horsley children should have priority at the Howard of Effingham School.</i></p> <p>Comment:</p> <p>School admissions policy is not a ‘planning issue’ for a Neighbourhood Plan</p> <p><u>(page 25 & 27) 5.16 & 5.23</u></p> <p><i>(5.16) The Guildford Addendum Report 2017 asserts that it should be borne in mind that the housing needs calculation include supply-side factors which consider needs arising from not just new-builds but existing households. Where smaller scale or single-storey dwellings are in limited supply the open market unit prices rise disproportionately. Furthermore, the character of existing village areas will be changed from a range of available dwellings to a monolithic sameness. However, new developments that incorporate maisonette style dwellings may be considered favourably.</i></p> <p><i>(5.23) The Guildford Addendum Report 2017 asserts that it should be borne in mind that the housing needs calculation include</i></p>	

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		<p><i>supply-side factors which consider needs arising from not just new-builds but existing households. Where smaller scale or single-storey dwellings are in limited supply the open market unit prices rise disproportionately. Furthermore, the character of existing village areas will be changed from a range of available dwellings to a monolithic sameness. However, new developments that incorporate maisonette style dwellings may be considered favourably.</i></p> <p>Comment: It is felt there could be some confusion regarding the term "maisonette type dwelling", and what actually is meant by it.</p> <p><u>(page 35) 5.44</u></p> <p><i>It is known that both The Raleigh School (primary) and the Howard of Effingham School (secondary) are over-subscribed.</i></p> <p>Comment: Effingham Parish Council would argue that the Howard of Effingham School is not over-subscribed as suggested, and have evidence to support this.</p> <p><u>(page 35) 5.45.</u></p> <p><i>It is strongly considered that West Horsley parents should have the opportunity for their children to attend the local primary school, if that is their preference, and by extension to have the opportunity to attend the most local secondary school, again if that is their preference.</i></p> <p>Comment: School admissions policy is not a ‘planning issue’ for a Neighbourhood Plan</p> <p><u>(page 35) 5.46</u></p> <p><i>The Plan notes Surrey County Council’s expectations regarding the location and accessibility of school sites and we endorse these.</i></p> <p>Comment:</p>	

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		<p>It is not clear what is meant by 'Surrey County Council's expectations', or whether this statement has any implications for local secondary schools including the Howard of Effingham School.</p> <p><u>General:</u></p> <p>Effingham Parish Council would also comment that:</p> <p>1) Many of the NP maps are indistinct.</p> <p>2) We would also comment that we were disappointed that Effingham Parish Council was not consulted at the Reg 14 stage (see Consultation Statement) even though the Howard of Effingham School is within our parish.</p> <p>Parish Clerk</p> <p>On behalf of Effingham Parish Council 15.02.2018</p>	
Wisley Property Investments Ltd.	WHNP/7	<p>Dear Sir/ Madam,</p> <p><u>REPRESENTATION ON WEST HORSLEY NEIGHBOURHOOD PLAN SUBMISSION VERSION</u></p> <p><u>FORMER WISLEY AIRFIELD</u></p> <p>I write to you on behalf of Wisley Property Investments (WPI) with regard to West Horsley's Neighbourhood Plan. WPI are the Appellant in the recent planning appeal for a new settlement at the former Wisley Airfield. The appeal hearings took place in September and October 2017. Since the hearings, Guildford Borough Council (GBC) have submitted their emerging Local Plan to the Planning Inspectorate for examination. The now submitted Local Plan includes the former Wisley Airfield as an allocation for mixed use residential led development under Policy A35.</p>	<p> WPI - Representation to West Horsley NP - Feb 2018 - Final_Redacted.pdf (659 KB)</p>

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		<p>The purpose of this letter is to provide you with an update on a number of matters relating to the appeal which are relevant to West Horsley Neighbourhood Plan. This representation does not propose any changes to the Draft Neighbourhood Plan, but does include proposed changes to the evidence base used and provide updates to this where possible.</p> <p><u>Guildford Borough Council Submitted Local Plan</u></p> <p>Wisley Airfield is a major strategic site allocated in the emerging Local Plan under Policy A35. The Site has been allocated for up to 2,000 homes, 4,300 sq.m of employment floor space (B1a/ B2/ B8) and 1,100 sq.m of retail floorspace (A1).</p> <p>On 13th December 2017 GBC submitted their Local Plan: Strategy and Sites (2017) for examination by the Planning Inspectorate. The plan is currently being examined by appointed Inspector Mr Jonathan Bore MRTPI DipUD. We understand that the hearings are likely to start in mid-May 2018. This progress means that the Local Plan has the potential to achieve the timetable set out by GBC in the Local Development Scheme for adoption by December 2018. Based on this progress the emerging Local Plan should be given significant weight in the preparation of the Neighbourhood Plan and in judging the effect, if any, of proposed Policy A35 on the Neighbourhood Plan. WPI is of the view that the considerable benefits arising from the delivery of new development at Wisley Airfield should be recognised by the Neighbourhood Plan.</p> <p><u>Wisley Airfield Appeal Benefits & Relevance to West Horsley</u></p> <p><u>Horsley</u></p> <p>WPI respects that West Horsley and East Horsley are producing separate Neighbourhood Plans for their individual settlements however the close relationship between the two settlements and shared facilities must be taken into account.</p> <p>The proposals at Wisley Airfield will provide a number of benefits to both West & East Horsley including increased public transport connection via new bus service and improvements to the Horsley railway station parade as set out in the conditions and obligations submitted with the Wisley Airfield appeal. Whilst Horsley Station is within East Horsley, it is in very close proximity to West Horsley and any improvements made, will benefit the residents of West Horsley. Other key benefits that will be brought about from the delivery of Former Wisley Airfield include:</p>	

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		<p>the provision of open space as a part of SANG, education provision, economic spend and employment. The proposed Burnt Common Slip Roads, which form part of the proposals at Wisley Airfield, which will provide benefits to the local congestion. The wider planning obligations for the proposals at Wisley Airfield also include £2 million of improvements to cycling in the local area.</p> <p>The retail evidence provided as a part of the appeal, demonstrates that the proposals at Wisley Airfield will have no adverse impact on nearby local centres. In fact, additional spend may be created in East and West Horsley centres which would promote the vitality and viability of the centre.</p> <p>Paragraph 4.5. of the Neighbourhood Plan highlights is a list of resident survey conclusions including the need for more small businesses and employment, need to promote public transport including bus services and to improve Horsley Station. Many of the aspirations of the local community can be provided or supported by the proposed development at Wisley Airfield.</p> <p>A key benefit to be provided by the development at Wisley Airfield is the improved bus services and it is proposed to provide bus services including links to Horsley /Effingham Junction station, served 5 times an hour. Key destinations in the bus route include: Guildford, Effingham Junction, Cobham and Ripley. These destinations also provide key links to wider locations across the region such as Leatherhead and London. These destinations also provide key links to wider locations across the region. The map below shows the proposed bus routes in more detail. This will improve the connectivity for the locals in the village with surrounding villages and towns, and it will encourage others into the local centre of Horsley again enhancing the vitality and viability of its centre.</p> <p>The proposed bus service map is shown below:</p> <p><i>[See attachment for map]</i></p> <p>Source: Wisley Airfield Summary Document (2017)</p> <p><u>Evidence Base for West Horsley's Neighbourhood Plan</u></p>	

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		<p>Finally, we question the evidence base used in West Horsley Neighbourhood Plan which came to the conclusion in Paragraph 6.4. that The Horsley Medical Centre will not be able to cope with the growing population in West Horsley and that the centre should be expanded or a new centre found.</p> <p>During the Wisley Airfield appeal, Savills conducted telephone survey research (October 2017) to determine the capacity of medical surgeries in the vicinity of Wisley Airfield. The study showed that all centres contacted were accepting patients, this included Horsley Medical Centre. The surgeries contacted include: Cobham Health Centre, The villages Medical Centre, Woking, Greenfield Surgery, Woking, Eastwick Park Medical Practice, Leatherhead and The Molebridge Practice, Leatherhead. It is therefore unclear how the NP Group have concluded that the Horsley medical centre will not have capacity moving forward.</p> <p>The capacity of local GP surgeries should be considered in the context of the Wisley Airfield development which will provide new healthcare facilities secure via the Section 106 legal agreement (S106).</p> <p><u>Conclusion</u></p> <p>Given the wider benefits which the proposals at Wisley Airfield will provide, the Neighbourhood Plan should take account of as part of the evidence base and policy approach to matters such as education, healthcare and public transport. This is important as if the improvements are delivered through Wisley there is potential for certain projects to no longer be needed and funded through Community Infrastructure Levy (CIL). The CIL Infrastructure Projects list currently includes improvements to Horsley Medical Centre, bus services and connections to Horsley train station which have the potential to be delivered via the Wisley Airfield. This funding could therefore be utilised elsewhere in West Horsley for other community projects.</p> <p>In conclusion, the purpose of this representation is to support the West Horsley Neighbourhood Plan. However, we believe the plan should show more support towards and recognise Former Wisley Airfield, particularly emphasising the potential benefits it would offer to West Horsley.</p>	
Surrey County Council	WHNP/8	Dear Sir/Madam,	 SCC Representation to

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		<p data-bbox="423 325 1003 355"><u>West Horsley Neighbourhood Development Plan</u></p> <p data-bbox="423 429 1868 528">Thank you for consulting Surrey County Council on the West Horsley Neighbourhood Development Plan consultation. We have been previously consulted on an informal basis and also at the pre-submission stage with regard to the proposed designation as Local Green Space (LGS) of the six sites listed as site 8 to 13 in Policy WH11 owned by the county council.</p> <p data-bbox="423 568 1928 810">We would reiterate our previous comments to say that we do not support the designation of these sites for local green space as they are considered to be unsuitable for any development other than highway improvements. It is not currently envisaged that any of these sites will be required for such schemes, but it would not be possible to say with 100% certainty that any of them would not ever be needed in the future. Any improvements would be required for safety reasons or to alleviate traffic congestion on the road network and designation as LGS would effectively present an unnecessary barrier to their implementation. We consider proposals for the designation of county owned highway verges for LGS to be inappropriate and we therefore do not support the inclusion of sites 8 – 13 in the list of sites proposed to be designated as LGS in Policy WH11.</p> <p data-bbox="423 850 1895 1019">It is noted that the policy has been amended to include a requirement for the provision of an alternative greenspace nearby, should any of these pieces of land be developed. This element of the policy could have potential unacceptable resource implications. It would be wholly unreasonable for the county council to be presented with a scenario whereby it is required to fund the purchase of additional land as well as meet the costs of any development scheme which, in any event, would be proposed entirely for the benefit of the community in terms of increased safety or reduced congestion.</p> <p data-bbox="423 1094 927 1125">We hope you find these comments helpful.</p>	<p data-bbox="1955 256 2112 355">WHNPC_Redacted.pdf (113 KB)</p>
Natural England	WHNP/9	<p data-bbox="423 1214 1133 1244">Planning Consultation: West Horsley Neighbourhood Plan</p> <p data-bbox="423 1284 965 1315">Thank you for your consultation on the above.</p>	<p data-bbox="1955 1182 2112 1386"> Natural England - West Horsley Neighbourhood Plan Guildford</p>

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		<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where our interests would be affected by the proposals made.</p> <p>In our review of the West Horsley Neighbourhood Plan we note that;</p> <ul style="list-style-type: none"> • there are designated sites or protected landscapes within or near the Neighbourhood Plan area but the Plan does not allocate any additional sites for development. <p>As a result we have no specific comment to make.</p> <p>However, we would like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and section 109 of the National Planning Policy Framework). Please ensure that any development policy in your plan includes wording to ensure “all development results in a biodiversity net gain for the borough”.</p> <p>The recently produced Neighbourhood Plan for Benson, in South Oxfordshire provides an excellent example. Although the Plan has not been to referendum yet, we are of the opinion that the policy wording around the Environment, Green Space and Biodiversity is exemplar. We would recommend you considering this document, when reviewing yours.</p> <p><u>Further Recommendations</u></p> <p>Natural England would also like to highlight that removal of green space in favour of development may have serious impacts on biodiversity and connected habitat and therefore species ability to adapt to climate change. We recommend that the final local plan include:</p> <ul style="list-style-type: none"> • Policies around connected Green Infrastructure (GI) within the borough. Elements of GI such as open green space, wild green space, allotments, and green walls and roofs can all be used to create connected habitats suitable for species 	<p>BC_Redacted.pdf (250 KB)</p>

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		<p>adaptation to climate change. Green infrastructure also provides multiple benefits for people including recreation, health and well-being, access to nature, opportunities for food growing, and resilience to climate change. Annex A provides examples of Green Infrastructure;</p> <ul style="list-style-type: none"> • Policies around the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be used in preference to that of a higher quality. • Policies around Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Examples of calculation methods are included in Annex A; <p>Annex A provides information on the natural environment and issues and opportunities for your Neighbourhood planning.</p> <p><u>Annex A - Neighbourhood planning and the natural environment: information, issues and opportunities</u></p> <p>Natural Environment Information Sources</p> <p>The Magic[1] website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available here[2].</p> <p>Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here[3]. Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.</p>	

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		<p>National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here[4].</p> <p>There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.</p> <p>If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.</p> <p>General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic[5] website and also from the LandIS website[6], which contains more information about obtaining soil data.</p> <p>Natural Environment Issues to Consider</p> <p>The National Planning Policy Framework[7] sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance[8] sets out supporting guidance.</p> <p><u>Your local planning authority should be able to provide you with further advice on the potential impacts of your plan on the natural environment and the need for any environmental assessments.</u></p> <p><u>Landscape</u></p> <p>Paragraph 109 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. Your plan may present opportunities to protect and enhance locally valued landscapes. You may</p>	

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		<p>want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.</p> <p>If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.</p> <p><u>Wildlife habitats</u></p> <p>Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here[9]), such as Sites of Special Scientific Interest or Ancient woodland[10]. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.</p> <p><u>Priority and protected species and habitat</u></p> <p>You'll also want to consider whether any proposals might affect priority species (listed here[11]) or protected species. Natural England has produced advice here[12] to help understand the impact of particular developments on protected species. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.</p> <p><u>Ancient woodland and veteran trees-link to standing advice</u></p> <p>You should consider any impacts on ancient woodland and veteran trees in line with paragraph 118 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forest Commission have produced standing advice for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances</p> <p><u>Biodiversity net gain</u></p>	

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		<p>Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve biodiversity. The NPPF section 109 states “<i>the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity wherever possible</i>”. . Suitable methods for calculating biodiversity net gain can include the Defra biodiversity offsetting metric[13] and the environment bank biodiversity impact calculator[14]. Natural England would expect a policy within the Neighbourhood Plan to include wording to ensure that net biodiversity gain is achieved.</p> <p><u>Best and Most Versatile Agricultural Land</u></p> <p>Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication Agricultural Land Classification: protecting the best and most versatile agricultural land[15].</p> <p>Green Infrastructure, Improving Your Natural Environment.</p> <p>Inclusion of Green Infrastructure (GI) in to development plans can provide multifunctional benefits to the area. These can include opportunities for recreation, health and wellbeing and access to nature as well as providing connected habitats for wildlife.</p> <p>Your plan or order can offer exciting opportunities to enhance your local environment through inclusion of GI. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained, connected, enhanced or new features you would like to see created as part of any new development. Examples might include:</p> <ul style="list-style-type: none"> • Providing a new footpath with landscaping through the new development to link into existing rights of way or other green spaces. • Restoring a neglected hedgerow or creating new ones. • Creating a new pond as an attractive feature on the site. 	

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		<ul style="list-style-type: none"> • Planting trees characteristic to the local area to make a positive contribution to the local landscape. • Using native plants in landscaping schemes for better nectar and seed sources for bees and birds. • Incorporating swift boxes or bat boxes into the design of new buildings. • Considering how lighting can be best managed to encourage wildlife. • Adding a green roof or walls to new or existing buildings. <p>You may also want to consider enhancing your local area in other ways, for example by:</p> <ul style="list-style-type: none"> • Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy in your community. • Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. • Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this[16]). • Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency). • Planting additional street trees. • Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links. • Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore). <p><u>Green Roofs</u></p> <p>Natural England is supportive of the inclusion of living roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.</p>	

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		<p>We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to http://livingroofs.org/ for a range of innovative solutions.</p> <p>[1] http://magic.defra.gov.uk/</p> <p>[2] http://www.nbn-nfbr.org.uk/nfbr.php</p> <p>[3]http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</p> <p>[4] https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making</p> <p>[5] http://magic.defra.gov.uk/</p> <p>[6] http://www.landis.org.uk/index.cfm</p> <p>[7] https://www.gov.uk/government/publications/national-planning-policy-framework--2</p> <p>[8] http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/</p> <p>[9]http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</p> <p>[10] https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p> <p>[11]http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</p>	

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		<p>[12] https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</p> <p>[13] https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-in-the-pilot-areas Note; the ‘Guidance for developers’ and ‘Guidance for offset providers’ documents provide a calculation method.</p> <p>[14] http://www.environmentbank.com/impact-calculator.php , and http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&ved=0ahUKEwj7vcbl0aDQAhVMDcAKHb8IDEUQFggsMAI&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usg=AFQjCNFfbkJIQ_UN0044Qe6rmiLffxckg</p> <p>[15] http://publications.naturalengland.org.uk/publication/35012</p> <p>[16] http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/</p>	

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