

West Clandon Neighbourhood Plan responses to Reg 16 consultation

Comment ID	Organisation	Agent	Representation	Files
WCNP2 1/3	Orchard Rd residents group		<p>The neighbourhood plan is completely reasonable about the development of the village, its aversion to more traffic and the need to protect village identity. The proposed development at Gosden Hill is a natural concern for residents. On the other side of the development in Burpham, we too are anxious about the arrival of even more traffic on local roads. My concern is that if the Green Gap is preserved in its entirety, there cannot be a link between Gosden Hill and the A3 at Burntcommon so willy-nilly, northbound traffic will have to head down the London Rd to Burpham and loop around Sainsburys to make the journey north on the A3. I agree with Burpham and Clandon residents that the only proper solution is a four-way junction at Gosden Hill. New amenities to meet the needs of Gosden Hill residents are recognised in the plan, but if there are no transport links, the new residents of Gosden Hill will join the traffic jam into Burpham to shop, attend surgeries and find services. It is in all our interests that the powers-that-be rouse themselves to avoid a traffic catastrophe for those of us who live here.</p>	
WCNP2 1/4	Ripley Parish Council		Ripley Parish Council agrees with and fully supports the Policies proposed in the West Clandon Neighbourhood Development Plan.	
WCNP2 1/6	Merrow Residents' Association		<p>Herewith the response from the Merrow Residents' Association to the West Clandon Neighbourhood Plan consultation</p> <p>Please note amended response with corrected date</p> <p>First response can be ignored</p> <p>[Text of letter is reproduced below. The response with the incorrect date has been removed]</p> <p>Response to West Clandon Neighbourhood Plan Consultation</p> <p>The Merrow Residents' Association (MRA) is pleased to have the opportunity to comment on the draft West Clandon Neighbourhood Plan since the parish of West Clandon adjoins Merrow and will be severely affected by the development of Gosden Hill Farm. We are pleased to note that the new draft has taken some of our earlier comments into consideration.</p> <p>We are commenting, specifically, on policy 2 (The Strategic Site at Gosden Hill Farm), para 7.10 (page 20) but also on section 8.</p> <p>We are disappointed with policy 2 on Gosden Hill Farm which is so superficial and does not reflect the detail in policy A25 of the Guildford Borough Local Plan- strategy and sites. Whilst we understand the wish of the parish to maintain the integrity of the village of West Clandon it is the case that 60% of the Gosden Hill Farm site lies in the parish of West Clandon and for that reason should receive more detailed consideration in policy 2 of this Neighbourhood Plan.</p> <p>We have explained both in writing and also at West Clandon Parish meetings the possible consequences of the development of Gosden Hill Farm in terms of additional traffic that will be generated by the new houses, the new schools, the new Park and Ride and the new railway station , both during the construction phase and when completed. This issue has been discussed at length during the development of the Guildford Borough Local Plan and during the examination of the plan in public before a Government Inspector. We have argued, as have others, that there should be a new 4 way junction on the Gosden Hill Farm site. This possibility appears in both policy A25 of the Guildford Borough Local Plan at paragraph 2 of the Transport Strategy and also in the more recent Strategic Development Framework SPD at figures 27 and 29 which was adopted by Guildford Borough Council in July 2020. This states that there should be a deliberative process of consideration as part of the development of the management process of the opportunity to provide an all movement junction of the A3100, the B2215 and the A247. This does not suggest as to where a 4 way junction should be sited but leaves open the possibility that it could be situated on the Gosden Hill Farm site although this is not</p>	MRA response to WCNP.docx

		<p>favoured by the Highways Authorities. Nevertheless this remains the preferred option of the Merrow Residents' Association. The possibility of a 4 way junction on the A247 at Garlick's Arch is simply not feasible as this would require not only extensive road works and re-configuration of the carriageways but closure of existing roads linking with the A3 in Burpham.</p> <p>The Guildford Borough Local Plan makes it clear under the requirements for policy A25 that there should be a 2 way junction at Gosden Hill Farm and this is also included in the SPD adopted by Guildford Borough Council in July 2020. However this will only serve the southbound carriageway of the A3. Vehicles from Gosden Hill Farm destined to join the A3 going north east will either have to travel through Burpham or on Park Lane to the outskirts of Merrow joining the A25 and then travelling to the Clandon cross roads to join the A247 passing through Clandon to join the A3 at Garlick's Arch on the new slip roads envisaged at policy A42 of the Guildford Local Plan. If of course these slip roads were not built then the traffic would pass through Ripley to join the A3 at Wisley.</p> <p>The MRA have argued, successfully at the examination of the Guildford Local Plan that if a 4 way junction at Gosden Hill isn't possible- and it may not be possible- that a relief road should be considered running south of the A3 to the slip roads on the A247 at Garlick's Arch. This was agreed by the Inspector and is covered in policy A25 of the Local Plan where it states under the requirements section that 'land could potentially required to be safeguarded for the provision of a connector road to the B2215 London Road/A247 Clandon Road' and also in the SPD where figures 27 and 29 both identify a potential link going North East towards the A247 at Garlick's Arch.</p> <p>Therefore we find it most surprising and disappointing that the West Clandon Neighbourhood Plan doesn't take the opportunity to address this real issue in some detail. The Plan gives the clear impression that so long as the village of West Clandon is adequately separated by green space from the development at Gosden Hill that no one should be too worried. That cannot be the case. We would expect the Plan to support the suggestion in policy A25 of the Guildford Borough Local Plan that a 4 way junction should be considered at Gosden Hill at the planning application stage when the master plan for the site is under consideration. As indicated above, this always has been the preferred option of the MRA to overcome the impending traffic congestion problem around Burpham and Merrow which can only get worse when Gosden Hill is developed. The extent of this additional traffic congestion shouldn't be underestimated. We also consider that this solution would provide the best option to protect West Clandon and the A247 from potential traffic overflow from the Gosden Hill Farm development.</p> <p>However if this option were to fail then the alternative should be pursued of a link road running south of the A3 from Gosden Hill to Garlicks' Arch as in the requirements section of policy A25 of the Guildford Local Plan and as in figures 27 and 29 of the Strategic Development Framework SPD. We recommend that policy 2 of the West Clandon Neighbourhood Plan should be amended to address and support these two options.</p> <p>We now turn to Section 8 (Non-Statutory Community Aspirations), para(ii) (page 32): "The evaluation of options for alternative routes for traffic, particularly heavy good vehicles, to the A247 through West Clandon. This should include possible routes to the West of Clandon Park opened up by any development at Gosden Hill and proposals to improve the A3 and its junctions and associated link roads"</p> <p>This section which relates to the sum of £1m in project LRN24 of the Guildford Borough Local Plan is very short on detail and relates to a traffic management and improvement scheme on the A247/The Street in West Clandon. The section suggests the use of possible routes to the West of Clandon Park for heavy good vehicles. This cannot be a reference to a new road as this would cost far in excess of the £1m in LRN24 and therefore can only refer to heavy vehicles using Park Lane in Merrow after negotiating the very narrow railway bridge between New Inn Lane in Burpham and Park Lane in Merrow. We must object in the strongest possible terms if Park Lane were to be considered for use in this manner for reasons we have already explained in this response. Such a suggestion makes no sense, should be avoided and should be removed from this Neighbourhood Plan.</p> <p>Whilst the MRA are very pleased with the development of the West Clandon Neighbourhood Plan we have major concerns over the current drafting of policy 2 and section 8 and we recommend that they should be amended as we have proposed.</p>	
WCNP2 1/7	Solve Planning	<p>Response to West Clandon Neighbourhood Plan Consultation</p> <p>Please see the attached letter</p>	<p>Representation Letter 090721 Solve Plannin</p>

Thank you

[Text of letter reproduced below]

Dear Sir/Madam,

Response to West Clandon Neighbourhood Plan Consultation

This letter is written on behalf of Helios Property Limited, a company with land interests within the Neighbourhood Plan Area.

Background

We wish to comment on certain aspects of the Submission Version of the Neighbourhood Plan (WCNP). In doing so we are mindful of the need to focus on whether the WCNP meets the basic conditions and other matters set out at paragraph 8 of Schedule 4b of the Town and Country Planning Act 1990 (as amended). In particular we focus on the following:

(i) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,

And

(iii) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),

Before commenting on the specific policies of the WCNP we feel it is important to highlight the potential change to the Local Plan position announced by Guildford Borough Council earlier this year. The Council is now proposing to review the Local Plan despite it only being adopted in April 2019.

The announcement indicates that the Council is seeking the review based on what they perceive are issues with the ONS population figures on which the Local Plan was based. At this point in time it is not clear what the scope of the review and the timescales/programme for undertaking this will be. It does though have the potential to alter the spatial framework and Development plan context in which the WCNP has been prepared and is intended to operate within.

We do though recognise that this is no fault of the Parish Council or the Neighbourhood Plan Group and that the Adopted Local Plan represents the current Development Plan to inform the WCNP.

General Concerns

Our primary concern relates to Policy 4 and the issue of protected views in particular, and this is explained below. However, this reflects the wider problem with the WCNP that, on certain matters, it seeks to go beyond national and local policy in some of the constraints it seeks to impose upon development.

A good example of this is Policy 1 Design within West Clandon Village (settlement and Conservation Areas) sub section xvi.

It states that development within the Conservation Area will only be accepted in 'exceptional circumstances.' This goes way beyond the requirements of the NPPF and Local Plan Policy. 'Exceptional' has a specific use in the NPPF when considering heritage issues.

The NPPF (193) sets out a process of assessing the impact of development on the significance of designated heritage assets, including conservation areas. It categorises levels of potential harm into substantial and less than substantial. At para 194 it states that for Grade II buildings or registered parks and gardens substantial harm should be exceptional. In the case of scheduled monuments, Grade II* listed buildings etc., substantial harm should be wholly exceptional.

The NPPF (195 and 196) explains the balancing process required and the weight to be applied to other public benefits etc before determining an application.

Policy 1, as drafted, fails to accord with this Policy as it precludes any assessment of any development by excluding it unless exceptional circumstances are demonstrated. It also sets the bar at a level which is reserved for listed buildings/parks and higher, and, even then only in the event of substantial harm. It also goes beyond the requirements of Policy D3 of the Local Plan which, quite correctly, cross refers to the assessment process in the NPPF.

This element does not meet the basic conditions (i) and (iii) of Schedule 4b.

Policy 4

A similar situation arises with elements of Policy 4.

The Green Gap element (i) seeks to apply an extra level of constraint/protection beyond that already afforded by its status as Green Belt. The reason given for this at 7.5 is its vulnerability to development and its importance to prevent coalescence with Guildford.

These objectives are already explicitly provided for in the purposes of the Green Belt set out at para 134 of the NPPF. There is no need for this additional level of protection. The limited circumstances where development in the Green Belt is considered appropriate are clearly set out at paras 145 and 146 of the NPPF. Development which does not fall within these criteria is, by definition, inappropriate and should only be allowed in very special circumstances. Policy P2 of the Local Plan on Green Belt also aligns, and cross refers to the NPPF.

This approach is clear and readily understandable. Policy 4(i) confuses this position without actually providing any additional protection in reality. Similarly, Policy 4 (ii) lists forms of development which might constitute very special circumstances. These do not align with the definitions in the NPPF and are further complicated by reference to permitted development. Permitted Development is generally unrelated to Green Belt and is certainly not affected by the proposed Green Gap designation.

For these reasons, we consider (i) and i(i) do not meet the basic conditions (i) and (iii) of Schedule 4b.

Policy 4 (v) requires proposals for development in West Clandon *to give special consideration to and assess the impact on protected views. Development that would cause an unacceptable impact on these views will not be supported.*

The preamble to Policy 4 sets out a series of views which are stated as being identified in Appendix 2 The West Clandon Character Area Assessment (WCCAA). There is potential here for a degree of confusion as the WCCAA is listed in the consultation as Appendix 1. The document titled West Clandon protected Views (WCPV) is listed as Appendix 2. I read the WCPV as an appendix to the WCCAA and have treated it on this basis here.

The WCCAA is a summary of built and landscape components which can be identified as comprising individual areas' character and we raise no objection to this as a background document to the WCNP.

Our concerns are that this is then used to conclude these areas require special protection both in and of themselves but also elevating them to the status where views out of these areas are also afforded particular protection.

It is not appropriate that all of these areas should be afforded an equal level of protection. Certain areas, such as the Conservation Area (Area 2) or of Ancient Woodland (e.g. Area 5) and, in the case of Area 1 adjacent to the AONB, clearly have particular sensitivities. However, as noted above, there is already National and Local policy to protect these.

There is already a requirement to consider the setting of a conservation area. This is acknowledged in the introduction to the WCPV.

The presence of Ancient Woodland imposes significant protection and constraints to development.

The NPPF also requires great weight to be given to conserving and enhancing landscape and scenic beauty in the AONB.

There is no justification for applying a blanket level of protection to the setting of all of these areas. Policy 4 (v) also seeks to protect the views out of these areas. It is not clear why such views are being protected in this way.

It is a well-established planning principle that there is no right to a view for its own sake. The WCVF also recognises this at Page 4. It offers the following criteria for protecting a view:

Criterion	Reason
The view must be accessible from a public road, footpath or public community space	To ensure inclusion of the majority of residents and visitors including drivers, cyclists, horse riders and walkers.
There must be a specific reason for selecting the view i.e. overreaching far view, view to an historical or public interest building/monument.	To ensure there is a valid reason for protecting the view rather than blanket protection, which may be too restrictive.

This need for a specific reason for this to be to a historical or public interest/building has clearly not been applied in a number of the views subsequently identified. These appear to have been selected on a more arbitrary basis. It is notable that the text below this table states:

It is appreciated that many residents enjoy beautiful views from private residences or gardens and whilst these are important this document focused on vistas and panoramic views that can be enjoyed by the majority of the wider public.

This is a much less rigorous approach and is not supported by national or local planning policy

This is evident in View 4 where the justification simply states that this view is valued by residents of Meadowlands.

Also, with View 6, no justification is provided other than a reference to the rural setting. Looking at the view identified in the following extract from the WCPV it is clear that this has no particular landscape quality which would justify protected view status.

[Picture of view and image of map extracted from the WCNF]

Figure 1 Extract from WCPV Document showing View 6

Reference is made in the supporting documents to the Guildford Landscape Character Assessment (2007). This identifies the wider area around West Clandon as falling within the Landscape Type E2: Ockham and Clandon Wooded Rolling Claylands. It identifies the following Key Characteristics.

[Figure listing key characteristics for Landscape Type E2]

It sets out three views within the landscape considered to be of note[1].

[1] P80 Guildford Landscape Character Assessment Rural Assessment Final Report

These are:

- View of Guildford Cathedral from A3
- Long views towards the chalk downs to the south
- Views across designated parklands

The study is a wide ranging one and is, by necessity quite general and does not support the approach adopted by the WCNF in all of the identified views to be covered by Policy 4(v).

			<p>The WCPV is not a proper Landscape Visual Impact Assessment and lacks the rigour a properly considered LVIA would provide. This is not an appropriate evidence base in which to base such a policy.</p> <p>It is also important to note that the Green Belt designation already protects these areas from most forms of development.</p> <p>All of the above concerns give rise to confusion.</p> <p>This confused approach is similar to that considered by the Examiner in the Bray Neighbourhood Plan[2] where a Green Gap policy was proposed to be overlaid with the existing Green Belt. The Bray Plan also sought to impose additional landscape designations similar to Policy 4(v). The Examiner’s conclusions are important and relevant to consideration of Policy 4.</p> <p>[2] Bray Parish Neighbourhood Plan 2016-2030 – Examiner’s Report</p> <p><i>Policy BNP-GG1 is confusing in the above regard. For example, it seeks to impose a policy to protect against coalescence, when this is already a Green Belt purpose. However, whereas Green Belt policy, as set out in Chapter 9 of the National Planning Policy Framework (the Framework), “Protecting Green Belt land,” establishes a detailed approach to preventing urban sprawl whilst keeping land permanently open, it is not clear exactly how Policy BNP-GG1 would ensure that development protects “the distinct and separate identities of existing settlements,” or how it might work alongside existing policies to achieve this.</i></p> <p><i>Further to the above, no detail is provided to set out in what way development might “protect the landscape and environmental qualities” of the proposed Green Gap. Furthermore, the supporting text only briefly refers to very general elements of the local landscape, based on a study dating from 2004 and provides little substantive evidence relating to “environmental qualities.”</i></p> <p>The Examiner then highlights the guidance in National Planning Guidance which states:</p> <p><i>A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.[3]</i></p> <p>[3] Paragraph: 041 Reference ID: 41-041-20140306</p> <p>Policy 4 does not meet these requirements for the reasons set out in this letter. It deviates from National and Local Plan Policy and therefore, in its current form does not meet the basic conditions (i) and (iii) of Schedule 4b.</p> <p>We would request that it be substantially redrafted to align more closely with National and Local Plan policy. It should be simplified and remove the confusing and unjustified additional levels of protection which seek to go beyond the protection afforded by Green Belt policy.</p>	
WCNP2 1/8	Taylor Wimpey	Savills	<p>See Savills covering letter and enclosures.</p> <p>[Text of representation reproduced below]</p> <p>Dear Sir/Madam,</p> <p>REPRESENTATION IN RELATION TO THE WEST CLANDON REGULATION NEIGHBOURHOOD DEVELOPMENT PLAN CONSULTATION</p> <p>On behalf of Taylor Wimpey Ltd (‘TW’) Savills submit this representation to the consultation of the West Clandon Neighbourhood Plan (‘WCNP’). As the Parish Council are most likely aware, TW are the lead developer on the Former Wisley Airfield Strategic Allocation, Policy A35 of Guildford Borough Council Local Plan: Strategy and Sites (‘LPSS’) (adopted April 2019). Policy A35 is allocated for approx. 2,000 dwellings, care facility,</p>	<p>210712 West Clandon NP Rep - Taylor Wimpey.pdf Ripley South Study - Engagement Brochure</p>

employment floorspace, community facility and education provision.

TW have no objection in principle to a positively prepared Neighbourhood Plan in West Clandon, however submit two objections on the basis of:

- The Neighbourhood Plan's conformity with LPSS, in particular strategic policies A35 and A42, as the main development plan for the borough; and
- Policy 4 (including Map 4) Green Gap which potentially plays a role in undermining strategic infrastructure requirements within the LPSS.

The National Planning Policy Framework (2019) (NPPF) outlines at Paragraph 37 that: "*Neighbourhood plans must meet certain 'basic conditions' and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum*".

The basic conditions relevant to neighbourhood plans outlined in the Planning Practice Guidance PPG (2014) (Paragraph: 065 Reference ID: 41-065-20140306) are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order or neighbourhood plan;
- b) the making of the order or neighbourhood plan contributes to the achievement of sustainable development;
- c) the making of the order or neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
- d) the making of the order or neighbourhood plan does not breach, and is otherwise compatible with, EU obligations;
- e) prescribed conditions are met in relation to the order or plan and prescribed matters have been complied with in connection with the proposal for the order or neighbourhood plan;

In addition, Paragraph 35 of the NPPF makes it clear that in order to be found 'sound' Neighbourhood Plans must be justified, and thus demonstrate an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

The NPPF also makes clear the importance of the hierarchy of plans. For Guildford, the Neighbourhood Plan must be in conformity with LPSS and saved policies Local Plan 2003, and respect the strategic choices made at that time. Paragraph 13 of the NPPF outlines:

"The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies".

All Neighbourhood Plans should provide local level input to planning and future development of a place, but must be consistent with the objectives of positive and sustainable planning. A Neighbourhood Plan is not simply a democratic exercise of expressing local wishes, rather sound planning proposals should be informed by those wishes of material relevance and must comply with the wider development plan for an area.

Emerging Policy 4 Green Gap (and Map 4) - Objection

Emerging Policy 4 and Map 4 of the WCNP sets out a Green Gap to the north and west of West Clandon Village. The emerging policy states that the area identified as the Green Gap will be conserved and its openness protected in line with national Green Belt policy. The draft green gap lies adjacent to the south of Policy A42 Land for new north facing slip roads to / from A3 at Send Marsh / Burnt Common. Although, the red line boundary of Policy A42 does not extend into the area highlighted as the Green Gap in Map 4, this potential allocation could act to prevent the coming forward of the allocated infrastructure requirements at the Send Marsh / Burnt Common Slip Road, subject to the ongoing potential infrastructure design.

		<p>There are currently no highways plans finalised for the Send Marsh / Burnt Common Slip Road and the infrastructure works may need to extend beyond the existing red line boundary, notably at the intersection with the existing A247 junction. The Former Wisley Airfield Policy A35 requirements set out that in order to mitigate the anticipated impacts of the allocated housing on the surrounding road network, two new slip roads and traffic management may be required at A247 Clandon Road (Burnt Common). The Options analysis work is proceeding at present with Highways England as part of the Ripley Study (enclosed with this representation). TW is committed to the delivery of the Burnt Common Slips, if these are deemed to be required.</p> <p>The adopted LPSS highlights that the slip road will mitigate the highways impacts from nearby development at Former Wisley Airfield and Garlick's Arch. Thus, subsequently also improving traffic within the settlement area of West Clandon.</p> <p>TW would like to remind West Clandon Parish Council that LPSS is adopted and this approach has been reviewed and found sound by an Inspector. It is essential therefore that the WCNP complies with and reflects the requirements of LPSS, including the strategic allocations.</p> <p>Change Sought: <i>As a result, TW request that the boundary of the Green Gap in Map 4 of the emerging WCNP is altered in order to extend the area surrounding Strategic Allocation A42 (Send Marsh / Burnt Common Slip Road) for vital infrastructure delivery. This could be marked as an appropriate buffer, where infrastructure and appropriate landscaping / environmental enhancements are proposed. This would represent a sound and deliverable approach consistent with the LPSS.</i></p> <p>Emerging Policy 1 Design within West Clandon Village (Settlement and Conservation Areas) - Objection</p> <p>On the whole TW have no objection to the general principles of draft policy 1 of the WCNP. However, TW object to section (xv) of the draft policy which states; '<i>developments within or affecting the Conservation Area should demonstrate they will not exacerbate the traffic impact on the setting</i>'. TW believe that the draft policy regarding design in the village should just make reference to design and landscape features only. The inclusion of potential traffic impacts is not relevant or under the jurisdiction of a Parish Council. This requirement of the draft policy in the Neighbourhood Plan undermines the wider development plan. As stated, it should not contradict the adopted LPSS that includes infrastructure allocations to the strategic highways network, which may have a wider traffic impact to the surrounding area.</p> <p>Change Sought: <i>As a result, TW request that section (xv) is removed from Draft Policy 1 (Design within West Clandon Village (Settlement and Conservation Areas) of the emerging WCNP. This represents a sound and deliverable approach consistent with the LPSS and the NPPF.</i></p> <p>TW and Savills reserve the right to comment further on all aspects of the Draft WCNP, including associated evidence base at all future consultation and Examination stages.</p>	
WCNP2 1/9		<p>I would like to comment on 2 of the potential protected views included in the plan.</p> <p>View 6 is inaccurate as the view does not provide a view over further agricultural fields but across to fields which also accommodate horses and are privately owned. Interestingly the photograph is taken across the riding menage which the Parish Council and residents objected to as being unsightly when planning was originally submitted. The photograph is a view across land used for the personal use of horses and as such the fencing could be changed at any time.</p> <p>View 10 - why would there be a protected view across fields into someone's back garden?</p> <p>I would suggest the only reason these 'views' have been submitted is due to a previous application made to convert the stables into a residential curtilage. All these photos actually prove from both angles is that the conversion would not have impacted either views so the statement made in point 7.15 is actually nonsense.</p>	

WCNP2 1/10	Natural England		<p>We have previously agreed with the SEA & HRA screening for this neighbourhood plan which stated that no further assessment would be required and as there is no specific allocation of additional housing within the neighbourhood plan we would not have further concerns in this regard. Given that the main allocation locally, within the Guildford Local Plan, at Gosden Hill Farm, is 60% within the plan boundary the appropriate level of thought does appear to have been given to this and consideration has been made for those new residents who will then become a part of the extended parish area.</p> <p>The Policies, as presented in this latest consultation, are worded in a way that should help result in better development when it does occur and with points such as Policy 1 (ii) where “significant” biodiversity gains are expected of any developments this should be promoted and pushed for as much as possible. Point (xviii) also makes it clear that large gardens are an expectation in order to continue to fit in with the prevailing garden sizes in the area and this is something that should equally be promoted as it will help ensure everyone living in the area has access to a generous area of green space of their own and of course out beyond that into the countryside.</p> <p>Within Policy 2 which relates to the strategic development at Gosden Hill Farm, it is good to see that points such as (iii - retained trees and planting) and (iv - gaps in fencing for wildlife etc) are stipulated for the proposed housing as these will hopefully enable a better network for biodiversity to traverse the new development rather than it being a blocker. The development here will of course be required to provide mitigation for the impacts upon the Thames Basin Heaths as it sits with the 400m to 5km zone and this will likely be dealt with by us at pre-application stage in order to ensure that proposals are acceptable.</p> <p>Policy 4, which relates to the Green Gap, Landscape and Views should provide a strong base for ensuring that anything put forward within this identified area is respectfully designed and assessed in order to minimise impacts and blend the proposals into the landscape as much as possible.</p> <p>The main Policy that is good to see strong wording for is Policy 6 Biodiversity and Environment which puts forward a number of strong pointers for any potential development to ensure it is as friendly to the local environment as possible. The various suggestions for what can be included in proposals make for a positive stance on how to best increase biodiversity and take account of things like climate change in due course as stated in point 7.21 where permeable surfaces will be sought more widely.</p> <p>It is good to see mention of ensuring that foul sewer mis-connections are avoided (as stated in section 9.2 (v)) and this should be highlighted to any potential developments to make sure that the correct connections are made. This will help ensure the rivers and waterways which receive the overflows if foul sewers are inundated during heavy rainfall events are better protected locally.</p> <p>The money promised through the local plan as mentioned at 8.1 will hopefully allow as many of the community aspirations to be implemented and it would be a good thing if as many of them as possible were to receive funding. The protection of woodlands via the trusts as mentioned in point (vii) would be a great step towards ensuring these ancient woodlands are protected long into the future and managed appropriately at the same time.</p> <p>Beyond our comments above at this time we wouldn't have any further points to make however do get in touch should you require clarifications.</p>	
WCNP2 1/11	Martin Grant Homes	Barton Willmore	<p>[PDF representation which includes appendices referred to in representation is attached]</p> <p>Dear Sir/Madam,</p> <p><u>WEST CLANDON NEIGHBOURHOOD PLAN: REGULATION 14 CONSULTATION REPRESENTATIONS SUBMITTED ON BEHALF OF MARTIN GRANT HOMES</u></p> <p>We write on behalf of our client, Martin Grant Homes, in response to the Regulation 14 consultation on the draft West Clandon Neighbourhood Plan (hereafter referred to as ‘the draft Plan’).</p> <p>Background and Context</p>	<p>21633 EF MK 21 07 09 West Clandon NP reps (final).p df</p>

Martin Grant Homes own land at Gosden Hill Farm which is allocated under Policy A25 of the adopted Guildford Borough Local Plan 2015-2034 for a mixed-use development including new homes, employment, retail, community and education uses. The development is a key component of Guildford Borough's adopted spatial strategy and will provide an important contribution towards meeting the development and infrastructure needs of Guildford Borough.

Within this context, we set out our comments below on the draft Neighbourhood Plan having regard to the basic conditions which Neighbourhood Plans are required to meet. In this regard, we comment on the extent to which the draft Plan meets the basic conditions, having regard to paragraph 41-065-20140306 of the Planning Practice Guidance: whether it will contribute to the achievement of sustainable development, is consistent with national policy and is in 'general conformity' with the strategic policies contained within Guildford Borough Council's adopted Development Plan.

Where specific parts of policies are commented on below we have included them in **bold**. Recommended changes to policy wording are underlined and recommended deletions are ~~struck through~~.

Policy 2 - The Strategic Site at Gosden Hill Farm

As noted above, Gosden Hill Farm is allocated under Policy A25 of the adopted Local Plan. The site allocation policy details an extensive list of requirements for the development. The Strategic Development Framework Supplementary Planning Document (SPD), adopted in July 2020, supplements the allocation policy, providing guidance in relation to design principles and the masterplanning of the site alongside the four other strategic development sites allocated in the Local Plan. As such, there exists a detailed policy context within which development proposals are to be brought forward and assessed. The draft Plan seeks to further supplement the site allocation policy which we do not oppose in principle, however, we comment on the criteria included within the draft policy below.

(i) Support will be given to improvements to the local footpath and cycle network delivered in association with the development of this site in line with GBC LPS&S 26(6). Specifically a potential footpath/cycleway route connecting with Footpath 66 in West Clandon through Frithys/Cotts Wood through the Gosden Hill Development towards Burpham should be established and safeguarded

Criterion (i) supports the delivery of improvements to the local footpath and cycle network. We note that Policy A25(6) requires 'permeability for pedestrians and cyclists into and from the development' and as such, (i) is superfluous. Moreover, whilst the principle of seeking a footpath connection from Footpath 66 through Frithys/Cotts Wood is understood, it is inappropriate for Policy 2 to seek to safeguard the route, which it is noted falls outside of the Gosden Hill site allocation boundary. The provision of a footpath is not necessary for development at Gosden Hill to be sustainable, as proven by the allocation of the site without a requirement for a footpath in this location.

Further, the wording of the draft policy is internally inconsistent with the first sentence identifying that support will be given to improvements whereas the second sentence introduces a requirement for a route to be established and safeguarded.

To this end, we recommend that the policy is reworded as follows:

Support will be given to improvements to the local footpath and cycle network delivered in association with the development of this site in line with GBC LPS&S 26(6). Specifically, a the potential to establish and safeguard a footpath/cycleway route connecting with Footpath 66 in West Clandon through Frithys/Cotts Wood through the Gosden Hill development towards Burpham should be explored established and safeguarded.

(ii) Housing types and built forms should help maintain an appropriate transitional edge to the development and maintain local character and countryside views

Criterion (ii) outlines that built form which helps to maintain an appropriate transitional edge to development is sought. Policy A25(23) requires 'sensitive design at site boundaries that has significant regard to the transition from urban to greenfield'. In this regard, the Council's aspiration is already addressed by the Local Plan (Policy A25(23)).

Criterion (ii) also seeks the maintenance of local character and countryside views. Gosden Hill is allocated for a strategic mixed-use development.

The scale of development envisaged in the Local Plan inherently means that character and views within the site and in its immediate vicinity will be altered to an extent. Indeed, Policy D1 within the Local Plan states that:

'Given the size, function and proposed density of the strategic allocations it may not always be desirable to reflect locally distinct patterns of development. These sites must create their own identity to ensure cohesive and vibrant neighbourhoods.'

It is therefore considered inappropriate to seek the 'maintenance' of the existing character and views.

(iii) Established planting and trees should be retained and incorporated within the development and the Ancient Woodland in Frithys and Cotts Wood protected

Criterion (iii) seeks the retention and incorporation of established planting and trees into development. The principle of retaining existing good quality vegetation is supported in principle. However, we recommend that the policy is amended to state that retention is sought where feasible in recognition that some tree removal may be necessary to achieve a high quality of design.

Moreover, the policy should seek the retention of highest quality trees as opposed to all vegetation, some of which could be of poor quality and whose loss could be readily mitigated as part of development.

Frithys and Cotts Woods are managed woodlands with felling licences in place. An ongoing management regime, which will involve continued felling, will be agreed as part of the planning application process relating to the Gosden Hill development. Policy 2 should allow for such woodland management to ensure that woodland can be effectively and appropriately managed, thereby ensuring its long-term sustainability.

(iv) Developments are expected to provide wildlife areas including gaps in fencing for wildlife runs unless demonstrated to be inappropriate

Criterion (iv) expects that wildlife areas will be provided within development. This is supported in principle, however it is not considered appropriate that the policy specifies what could constitute a wildlife area as such an approach is overly prescriptive. Moreover, no evidential basis is provided to demonstrate that the wildlife areas sought are appropriate in this location. We therefore recommend the deletion of 'including gaps in fencing for wildlife runs'. Furthermore, (iv) repeats Policy 6 and so is not considered necessary.

*(v) Facilities should be sufficient to the needs of the local community and include:
Flexible Space for Community Events and organisations;
Playground space for Children and Toddlers;
Pitches for Football and other Games;
Adequate Car Parking for participants.*

Criterion (v) identifies facilities to be provided as part of the development. Policy A25 includes requirements for community uses, playgrounds and sports pitches. Parking to serve such facilities will be required to be provided in accordance with the Vehicle Parking Standards SPD (a revised version of which is understood to be due to be prepared). As such, (iv) provides no additional detail compared to existing policy and guidance and is considered superfluous.

Having regard to our comments above, we recommend that Policy 2 is reworded as follows:

In addition to the requirements set out in Policy A25 of the Guildford Borough Local Plan, the following will be sought as part of development proposals within the Gosden Hill Farm Strategic Site where feasible and appropriate will be supported subject to the following criteria:

(i) Support will be given to Improvements to the local footpath and cycle network including connectivity to West Clandon delivered in association with the development of this site in line with GBC LPS&S 26(6). Specifically a potential footpath/cycleway route connecting with Footpath 66 in West Clandon through Frithys/Cotts Wood through the Gosden Hill Development towards Burpham should be established and safeguarded;

~~(ii) Sensitively designed site boundaries Housing types and built forms should help maintain an appropriate transitional edge to the development and maintain local character and countryside views;~~

~~(iii) The retention of good quality Established planting and trees should be retained and incorporated within the development and the Ancient Woodland in Frithys and Cotts Wood protected;~~

~~(iv) Developments are expected to provide The provision of wildlife areas including gaps in fencing for wildlife runs unless demonstrated to be inappropriate;~~

~~(v) Community facilities designed to meet should be sufficient to the needs of the local community and include: Flexible Space for Community Events and organisations;
Playground space for Children and Toddlers;
Pitches for Football and other Games;
Adequate Car Parking for participants.~~

Policy 3 - Developments in Other Areas of the Parish

We broadly support Policy 3, however, we have the following comments on the policy as drafted.

(i) Development in the Countryside should not individually or cumulatively result in coalescence and loss of separate identity of the village of West Clandon with neighbouring settlements or the Guildford Conurbation

Criterion (i) repeats content relating to coalescence included in draft Policy 4, upon which we comment below. Whilst we note that Policy 4 relates to a specific part of the Neighbourhood Plan area, we do not consider that there is a need to repeat wording in multiple policies. We therefore recommend that the draft Plan is rationalised by having one policy relating to landscape which covers the whole of the Plan area, rather than one policy which relates to a landscape designation, which as we discuss below, we consider to be inconsistent with national policy, and other policies which relate to other land.

(ii) The Parish's landscape has an important bearing on the quality of the local environment. The Parish Council is keen to ensure that development respects landscape quality and where possible takes opportunities to improve landscape quality and hedgerows in those areas where it may have become degraded

Criterion (ii) sets out an aspiration for development to take opportunities to improve landscape quality and hedgerows in areas where it may have become degraded. As this is an aspiration, we consider that it is inappropriate to include it within Policy 3. We therefore recommend that it is included within section 8 of the draft Plan rather than within Policy 3.

(v) Buildings should be of good design and use high quality materials. Scales, heights and form of buildings should be sympathetic to the existing built environment; The transitional edge of the development facing towards West Clandon should have a density, scale, height and mass which forms a gradual transition to open countryside and reflects the rural character of the immediate area and the character of development in West Clandon

Criterion (v) includes reference to 'the transitional edge of the development facing towards West Clandon' and says that this area 'should have a density, scale, height and mass which forms a gradual transition to open countryside and reflects the rural character of the immediate area and the character of development in West Clandon'. It is unclear what 'development' this text is referring to and it is therefore recommended that this text is deleted from the draft Plan. Gosden Hill is covered by Policy A25 in the adopted Local Plan and the Strategic Development Framework SPD.

(viii) All development should have regard to the need to retain and enhance the leafy, rural and open character of the parish, preserving views from the public domain into and across other areas

Criterion (viii) repeats content, specifically in relation to character and views, included in draft Policy 4, upon which we comment below. As noted

above, we do not consider that it is appropriate to repeat wording in multiple policies and therefore recommend that the draft Plan is rationalised by having only one policy relating to landscape.

Policy 4 - Green Gap, Valued Landscape and Views

As drafted, Policy 4 seeks to introduce requirements which are not consistent with national policy or in general conformity with the Local Plan. Moreover, the proposed requirements will not contribute to the achievement of sustainable development. We therefore object to the policy as drafted, as we comment in detail below.

'Green Gap'

An area of land is identified on Map 4 as a proposed 'Green Gap'.

The draft Plan recognises that all the land identified for Green Gap designation lies within the Green Belt. However, in anticipation of potential future development pressure the draft Plan states the Gap is to be designated 'to preserve the separate identity of the village of West Clandon and maintain its rural setting' (page 23).

The designation of this land as a Green Gap is considered unnecessary. The identified Gap is within the Green Belt where inappropriate development is, by definition, harmful under the NPPF (Section 13). The purposes of the Green Belt as set out in para 134 of the NPPF are noted to, inter-alia, check the unrestricted sprawl of large built-up areas, prevent neighbouring towns merging into one another, safeguard the countryside from encroachment, and preserve the setting and character of historic towns. Collectively, these purposes serve to prevent both the spatial and visual aspects of potential coalescence, thereby serving the purpose that the Gap is intended to serve.

Furthermore, no assessment is provided within the draft Plan or its appendices as to whether the land proposed to be included in the Green Gap warrants designation as a gap, either in terms of landscape assessment or in terms of the landscape elements of the area. Appendix 1 includes further discussion of the merits of the land proposed to be within the Green Gap. In summary, the land is not considered to warrant designation as a Green Gap.

Further to this, it is noted that Green Belt appears to separate the settlements within the draft Plan area and consequently the role of separation is already largely performed but, in a manner, compatible with national planning policy.

Taking all the above into account, we consider that Policy 4 as constructed does not have regard to the NPPF and does not therefore meet the required basic conditions in that it has regard to national policies or contributes to the achievement of sustainable development.

(i) Development proposals for new development, either individually or cumulatively, will only be supported where they conserve and where possible enhance the open landscape character of the gap, and do not reduce the physical gap between West Clandon and the surrounding settlements having regard to the recommendations of the relevant Guildford Borough Council and Surrey County Council Landscape Character Assessments

(ii) Any such developments should accord with national and Local Plan Green Belt Policies and respect and enhance the rural nature, historic character, significance and amenity of the area and may only be supported in very special circumstances and with consideration of the impact on its character and setting. These may include opportunities for informal recreation, public access, permitted development, repurposing and replacement of agricultural buildings

Criterion (i) and (ii) outline that development proposals will only be supported where they conserve and where possible enhance the open landscape character of the gap and do not reduce the physical gap between West Clandon and surrounding settlements. As discussed above, this land is designated as Green Belt, thereby meaning that its openness is protected by national policy.

Moreover, as drafted, the policy is more onerous than national policy as it does not recognise all kinds of development that would not be inappropriate in the Green Belt, for example appropriate facilities for outdoor sport, outdoor recreation, cemeteries and burial grounds, allotments and buildings for agriculture and forestry which paragraph 145 of the NPPF identifies as exceptions to inappropriate development in

the Green Belt.

In addition, as drafted the policy does not allow for development which could reduce the separation between settlements, physically, visually or perceptually, but still be sustainable, thereby contravening the basic condition requiring neighbourhood plans to contribute to the achievement of sustainable development. Indeed, the proposed Gap could inhibit the delivery of opportunities identified in the adopted Local Plan, for example the potential for an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road identified in Policy A25.

To this end, we object to the drafting of (i) and (ii) and on the basis that they are unnecessary we request that they are deleted as unnecessary from the Neighbourhood Plan.

However, if a policy is to be retained, it should be positively phrased so as to reinforce the positive characteristics of the Gap as opposed to seeking to restrict all development.

'Valued' Landscape

Whilst not specifically referred to as such within the draft Plan, the title of Policy 4 suggests that the Parish Council consider this land to be a 'Valued Landscape'.

We strongly oppose the suggestion that this land warrants designation as a Valued Landscape. An Area of Great Landscape Value is identified in the Guildford Borough Local Plan (Policy P1). This designation is in addition to the Surrey Hills Area of Outstanding Natural Beauty (AONB). The land proposed to be designated through the draft Plan falls outside of these two areas of valued landscape. No basis for the allocation of this land as a Valued Landscape is provided within the draft Plan with no special quality of the landscape identified. Moreover, as set out in the Landscape and Visual Advice Note provided at Appendix 1, the landscape of this area is not demonstrably special or valued and therefore is not considered to be appropriate for identification as a Valued Landscape.

Against this background, we consider that the policy as drafted is not consistent with national policy and should be amended to remove reference to 'Valued Landscape'.

Views

Policy 4 proposes the identification of protected views.

(v) Proposals for development in West Clandon should give special consideration to and assess the impact on protected views. Development proposals that would cause an unacceptable impact on these views will not be supported

Criterion (v) sets out that proposals should give special consideration to and assess the impact on protected views. However, no protected views are identified within Policy 4. As such, it is unclear which views are intended to be protected. We acknowledge that Appendix 2 of the draft Plan includes some discussion of views, however, there is very limited justification for seeking to protect these views, which is not considered to demonstrate that they warrant protection, either due to being special and above the norm or especially typical. Moreover, the images shown in Appendix 2 do not illustrate demonstrably special views and it is not therefore considered that the identified views are worthy of protection.

Furthermore, Appendix 2 of the draft Plan sets out that 'it was not thought necessary to identify views of the village centre and its historic and iconic buildings due to other protections offered to these assets' (page 3). The same applies to the views which have been identified as they are located within the Green Belt and therefore protected by national policy. In addition, several of the views identified comprise Ancient Woodland or form part of the setting of the Clandon Park Registered Park & Garden and will therefore be further protected by national and local policy relating to these matters.

In this regard, we do not consider that the identification of the proposed protected views in the draft Plan is appropriate or necessary.

Other Comments on Policy 4

(iv) Any development should avoid the location of any new large mass of development or bulky structures which are overly visually intrusive on this character area; Development should be subject to rigorous landscape and visual impact assessment, sited carefully, and designed to minimise impact, and integrate with the area's rural context; Development should promote the use of appropriate plant species and boundary treatments at urban edges to better integrate development into the adjacent rural character

Criterion (iv) repeats bullet point 9 on page 82 of the 2015 Surrey Landscape Character Assessment without adding any further detail. It is therefore not required within the policy text and its inclusion within the supporting text (paragraph 7.3 of the draft Plan) is appropriate.

Taking account of our comments above regarding Policy 4, in addition to our comments on other policies containing elements relating to landscape, we recommend that Policy 4 as drafted is deleted and replaced by a single landscape policy which applies across the whole of Neighbourhood Plan area. We recommend that the replacement policy is worded as follows:

Development proposals in West Clandon should have regard to the recommendations of the relevant Guildford Borough Council and Surrey County Council Landscape Character Assessments and be informed by landscape and visual impact assessment, where appropriate.

Developments should take account of the existing character of the area and, where possible, seek to enhance the character and setting of West Clandon.

The provision of cycle routes and footpath between the village of West Clandon and surrounding settlements will be supported.

Policy 6 - Biodiversity and Environment

In principle, we support Policy 6. However, we consider that some of the biodiversity enhancements sought may not be appropriate for or deliverable on some development sites. In this regard, we recommend that the policy seeks features such as nesting boxes, natural verges, eco-friendly hardstanding and permeable fences where feasible.

(iv) Developments should aim to enhance the leafy rural character of the area and provide net gains to biodiversity. Hardstanding and driveways in permeable eco-friendly materials will be encouraged

Criterion (iv) sets out that developments should aim to enhance the leafy rural character of the area. This repeats Policy 4 and is therefore not considered necessary. As we have set out above, we consider that landscape should be the subject of a single policy which covers the whole of the Neighbourhood Plan area.

(vi) Where net losses to biodiversity are unavoidable a rigorous evidence based assessment demonstrating any special circumstances and proposed mitigation in line with local and national policy

Criterion (vi) does not reflect national or local policy. Paragraph 170 of the NPPF sets out that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Paragraph 175 outlines the mitigation hierarchy, stating that if significant harm to biodiversity from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Local Plan Policy ID4(2) states that new development should aim to deliver gains in biodiversity where appropriate. We consider that (vi) should be reworded to be consistent with national and local policy.

Taking account of the above, we recommend the following changes to Policy 6:

(i) Development proposals ~~Landscaping and Open Space~~ should provide enhancements for maximise the potential for biodiversity, including where feasible and the preservation of wildlife;

(ii) Nesting boxes, ~~integrated into walls and new green planting~~ should be included to maximise biodiversity unless there is specific justification not to;

		<p>(iii) Where possible proposals should retain or re-provide as necessary natural verges to the highway,;</p> <p>(iv) Developments should aim to enhance the leafy rural character of the area and provide net gains to biodiversity. Hardstanding and driveways in permeable eco-friendly hardstanding and materials will be encouraged;</p> <p>(v) permeable fences should be permeable to wildlife;</p> <p>(vi) Where net losses to biodiversity are unavoidable on development sites, impacts should be appropriately mitigated and compensated for a rigorous evidence based assessment demonstrating any special circumstances and proposed mitigation in line with local and national policy.</p> <p>Policy 8 - Car Parking</p> <p>Whilst we support the principle of Policy 8, as the policy wording acknowledges, car parking standards are outlined in the Guildford Borough Vehicle Parking Standards SPD and Surrey County Council’s Parking Guidance for Development. In this regard, the inclusion of parking policy in the draft Plan which reiterates existing guidance is considered unnecessary and should be deleted.</p> <p><i>(iii) Developments will be encouraged to provide appropriately sited electric fast charging points for every home for which there is a designated parking space.</i></p> <p>Criterion (iii) encourages the provision of electric fast charging points at every home where there is a designated parking space. We recognise that the provision of charging points is something the Council wishes to encourage, however we consider it would be appropriate to include this aspiration within section 8 of the draft Plan. Standards for electric vehicle charging are also covered in the aforementioned guidance.</p> <p>Summary</p> <p>Martin Grant Homes support West Clandon Parish Council in seeking to prepare a Neighbourhood Plan. However, it is imperative that the Plan is in general conformity with national and local policy; as such, we consider that some amendments to the draft Plan are necessary as we have outlined above.</p> <p>In particular, we recommend that the following changes are made:</p> <ul style="list-style-type: none"> • Delete policies which seek to impose unjustified designations, such as the proposed Green Gap; • Delete policy wording which replicates national and/or local policy; and • Set out the Council’s aspirations within section 8 of the Plan rather than within policies. 	
WCNP2 1/12	Highways England	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3 and M25 motorway (specifically M25 Junction 10).</p> <p>We have reviewed this consultation and its supporting documentation and have ‘No Comments’. However, please do continue to consult Highways England as this Neighbourhood Plan progresses.</p>	
WCNP2 1/13	Send Parish Council	<p>Send Parish Council, as a Statutory Consultee, has considered the proposals and draft policies of the West Clandon Neighbourhood Plan which we</p>	

		<p>generally support. The Council share West Clandon's concerns relating to traffic issues which are particularly relevant to Send (the A247 which runs through both West Clandon and Send as a major route for vehicles).</p> <p>With reference to the above please note that in the Send Neighbourhood Development Plan there were many concerns consistently raised by Send residents during our consultations regarding volume of traffic, vehicle speeds, congestion and inappropriate parking. Whilst supporting efforts to promote and widen sustainable transport options / availability, our Council still feel that - certainly in the medium term - resident adults are likely to own a car (traditional or electric) to reach employment locations, take children to non-local schools, shop and social activities. The resulting traffic should therefore not be underestimated particularly on the A247 and re-routing it would not resolve the problems. Proposals that enhance sustainable and accessible transport opportunities and help address transport issues which affect Send and surrounding area, will therefore be supported.</p>	
WCNP2 1/14	Historic England	<p>Thank you for consulting Historic England on the submission version of the West Clandon Neighbourhood Plan. Historic England is the government's advisor on planning for the historic environment, including the conservation of heritage assets and champions good design in historic places. As such we limit our review to those areas that fall within our remit and silence on other matters should not be treated as approval or consent.</p> <p>In general, we have no objections to the content of the plan and our comments relate to areas we wish to express particular support for, or where we feel greater clarity is needed.</p> <p>Policy 5 includes a reference to 'local buildings of historic interest' that are identified in Appendix 1 of the plan. These may be deemed to represent non-designated heritage asset, to which policy in the Planning Policy Framework would apply. We support the identification of non-designated heritage assets through neighbourhood planning but feel the identification and the consideration of their significance in planning decisions that this should provide is rather lost by the inclusion of this policy element in a Policy mainly focused on community facilities. As such, to ensure the policy provides clarity for decision making, we would suggest this part of Policy 5 is separated out to create a separate policy identifying these local buildings of historic interest and the presumption against their loss, taking into account the directions of the NPPF to ensure decisions are informed by evidence of their significance and the potential loss or harm that could result from proposals, the measures taken to avoid or minimise harm and the public benefit (if any) that might justify any residual loss or harm. However, having briefly review Appendix 1 we cannot see any buildings referred to as 'local buildings of historic Interest' and therefore, it isn't clear to which buildings this policy would apply.</p> <p>As a first step we would ask the examiner to invite the Parish Council to provide further evidence of which buildings or structures have been identified as 'local buildings of historic interest' in the plan making process. This may also require giving owners some time and opportunity to provide their own evidence of whether these have been appropriately identified as non-designated heritage assets.</p> <p>Policy 7 Local Green Space. We are pleased to support the identification of Local Green Space that protects area with local historic interest. As such, we note the designation of the Village Green as an area some notable local historic interest as a place of commemoration and village identity.</p> <p>We hope these comments are of assistance to the examiner but would be pleased to answer any queries arising from them.</p>	
WCNP2 1/15	Burpham Neighbourhood Forum	<p>Dear Sirs,</p> <p>WEST CLANDON NEIGHBOURHOOD PLAN - CONSULTATION RESPONSE</p> <p>Please find enclosed the Burpham Neighbourhood Forum's consultation response relating to the West Clandon Neighbourhood Plan public consultation.</p> <p>We quote the relevant paragraph number/title, in blue, with our comments below.</p>	

If you have any queries regarding the enclosed please do not hesitate to contact us.

Chairman's Foreword:

- The Foreword should be double checked for correct punctuation.

Para 1.1

- Delete 's' from 'plans'.
- Regarding the relationship between the Neighbourhood Plan and Guildford's Local Plan, the correct terminology is that the West Clandon Neighbourhood Plan 'will become part of the development plan' for the area. (Please review Para 13 of NPPF correct interpretation of the relationship between the Neighbourhood Plan and Local Plan).

Map 1

- It is difficult to see the Neighbourhood plan boundary on the map. We suggest a stronger colour and/or a thicker line is used to marking the boundary.

2.9 - 3.4

- This is background information which would be more at home in an Appendix.

Section 4 and 5

- These sections should be brought forward to set the scene earlier in the plan.

Section 6 Character Assessment

- We recommend this section should be moved to an Appendix, to avoid any confusion with policy.
- We recommend each character area be accompanied by photographs, to give the reader a general indication of the character features referred to.

6.5 to 6.10 (Area 3 to Area 10)

- The descriptions for each area fail to identify current parking levels per property, a lost opportunity to form a parking requirement on new developments by indicating if the currently parking levels are adequate or inadequate.

Policy 1

- (xviii) fails to quantify 'large gardens', thus is open to wide interpretation of the correct ratio between built and green space.
- (ii) The policy fails to adequately specify what is meant by environmental, sustainability and biodiversity requirements. This will allow too much leeway in application preparation.
- (i) The policy makes reference to Appendix 1, which is currently a separate document. The plan and appendices should form one document for ease of reference in the final adopted version of the plan.
- (xv) Again, a missed opportunity to identify parking requirements a lost opportunity.

Map 2

- The resolution of this map is too low making it unreadable in places. We recommend a higher resolution in final document.

		<p>Policy 2</p> <ul style="list-style-type: none"> • This policy is, on the whole, rather light on detail, particularly for a strategic site. Further detailed requirements could be added, within the overarching wording of Local Plan policy A25. • Refers incorrectly to Policy A26 (GBC LPS&S 26(6)). Gosden Hill is A25. • Again, no attempt to deal meaningfully with future parking requirements. Large new estates are often woefully undersupplied with parking spaces. Every effort should be made to avoid this at all levels of the development plan. • It is unclear how existing substantial tree planting can be retained when the development of the site will require their removal, noting currently there is a tree preservation order TPO covering large tracts of land in this area, while Frithys Wood and Cotts Wood are outside the boundary of policy of A25. This section needs clarification. <p>7.8</p> <ul style="list-style-type: none"> • This text fails to address the policy requirement in Policy A25 for a junction at the A3 and connection to the A247 and B2215. The northbound sliproads will also impact West Clandon traffic levels and should be addressed. <p>Policy 8</p> <ul style="list-style-type: none"> • This policy, whilst well intentioned, is weak on detailed parking requirements and appears to fall back on future parking standards as yet undetermined by GBC or SCC, which may turn out not to serve West Clandon's best interests. The opportunity should be taken to stipulate tailored parking standards to the needs of the Parish. specify minimum parking space numbers for different dwelling types. <p>9.3 - c</p> <ul style="list-style-type: none"> • This sub-section states a clear aim to remove / re-route traffic away from the A247 and the village, but nowhere within this plan is commentary provided on the A247 'on-off' sliproad proposal which will fundamentally increase traffic in the village of West Clandon. The Parish's position on this matter should be stated. • Consideration should be given to supporting a new road from Potters lane to the Park and Ride on the A25 to alleviate traffic pressures in this area. <p>Maps 8-10</p> <ul style="list-style-type: none"> • These maps would benefit from accompanying text to describe their relevance. <p>Overall commentary:</p> <ul style="list-style-type: none"> • The draft West Clandon Neighbourhood Plan fails to take the opportunity to adequately consider the wider implications of Gosden Hill development and proposed slip roads onto the A247. • The plan appears to be dependent on documents not yet prepared, such as borough and county level parking standards, and risks becoming out of date in its early years once strategic development begins. 	
WCNP2 1/16	Southern Water	<p>Thank you for your email below, inviting Southern Water to comment on the West Clandon Neighbourhood Plan.</p> <p>However, I confirm that Southern Water does not provide water supply or wastewater services to the parish of West Clandon, and therefore would have no comments to make.</p>	

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