

Appendix 11 e - Haslemere Neighbourhood Plan – Regulation 14 Consultation Representations, Response and Suggested Action

Representations, comments and issues raised – Consultee letters/Survey and webinar additional comments	Response	Suggested actions
<b>Southern Gas Network</b> – do not wish to comment at this time.		
<b>West Sussex County Council</b> – no comments at this time		
<b>Natural England</b> - It does not appear that the plan is allocating any sites for housing development. With this in mind, Natural England have no comments to make.		
<b>Environment Agency</b> - We regret that at present, the Thames Area Sustainable Places team is unable to review this consultation. For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted since 2012, or which have been confirmed as being compliant with the National Planning Policy Framework) as being of lower risk. At this time, therefore, we are unable to make any detailed input on neighbourhood plans being prepared within this local authority area.		
<b>Grayshott Parish Council</b> - Members of the Parish Council have read the plan and have asked me to pass on their appreciation of the quality and extent of the work and are looking forward to seeing how it progresses.		
<b>Chamber of Trade and Commerce</b>		
Housing requirements seem to be met without consideration given to the demands placed on parking needs, school capacity, medical services, strain on other infrastructure such as increased road use, leisure facilities etc We think any planning proposals should be considered in the whole so that the residents needs are met as well as the housing quota	Agreed. H7.1 amended to require developers to consider the impact on infrastructure of proposed development.	Amended H7.1
Parking-never seems to get resolved! Another level on the Weydown Road car park and at the station would help and parking charges to be reduced so people who work in Haslemere could have access to affordable daily parking. The Chamber of Commerce commissioned a concept to use the Fairground carpark land for pop up shops, community facilities as well as low cost parking. In the long term that would have better amenity use than a pay and display car park for the town? A study by Southampton University found that people spent more money in a town if they parked for two hours. The Chamber of Commerce has been lobbying for the first half an hour of parking to be free and then the next charging band to be two hours. If town centres are to compete with online shopping, the barriers to people coming into the town must be reduced and parking charges/restrictions are perceived to be more of an issue than they are in reality-an hour’s parking is about the same cost as two Second Class stamps but is resented when it is charged for! A thriving town centre depends on people being able to access it.	A Neighbourhood Plan sets development policy at a local level and as the NP is not allocating sites it is not possible to allocate a specific site for parking. However, a new policy H9.6 has been added encouraging developers to provide additional off-street parking for shopping areas and residents.	New policy H9.6
<b>Opportunity 2</b> The proposal to relocate the industrial estate behind the station was felt to be flawed. It allows a greater balance of activity within the town-not just clothes shops, coffee bars and estate agents- and so is thought to be key to maintaining the character of the town centre. Also it encourages people to come into town to buy goods or services offered by those businesses and provides town centre employment.	This opportunity was included so that thorough investigation into the use of this large brownfield site for a mixed use development is carried out. Beyond 2032, there may be very few brownfield sites available for development.	
<b>H15.2</b> The current Government proposal to alter planning laws needs to be considered in light of the likely loss of retail shops. Should the alteration from retail be encouraged to commercial rather than residential in the first instance? eg shop to a coffee shop or hairdressers?	As a new Use Class Order came into effect after the consultation the economy policies have been altered to reflect the new classes and encompasses a larger variety of business uses	Amend H15.2 and H17

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<b>National Trust</b>		
<p><b>H1.1</b> The National Trust supports the introduction of formal settlement boundaries around Haslemere, Hindhead and Grayswood as a means of protecting the locally and nationally protected landscapes around the town and villages as well as ensuring that there is not unrestricted growth into the countryside alongside this securing the promotion of the use of previously developed land within the settlements. This is particularly important to the Trust given its significant land holdings in the northern and eastern parts of the Neighbourhood Plan area, many of which were given to the Trust very early in our existence by local preservation societies and consequently have a high level of significance not only to the organisation but to the local communities which they serve.</p>	Noted	
<p><b>H1.3</b> No, I do not support this policy, The Trust recognises that the Neighbourhood Plan will have to respond to proposals emerging in the Waverley BC LPP2 in looking to ensure that housing demands are met, however there is concern regarding the approach in H1.3 which seems to accept that development in the AONB and AGLV is likely to happen beyond the settlement boundary being defined. The Trust considers that development in these areas should still be strongly resisted, particularly in the AONB and within the setting of the South Downs National Park as the NPPF clearly states that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status protection in relation to these issues." (para 172). The Trust would therefore welcome a review of the wording in this criteria to ensure that if there is a need to allowed development beyond the defined new settlement boundaries it is focused outside of local or national landscape designations.</p>	Other responses to the Regulation 14 consultation also indicated that many organisations and a large proportion of the community did not support this policy. Concerns were expressed that it could encourage proposals to come forward for development on land designated as AONB or AGLV.	Policy has been removed.
<p><b>H1.5</b> The Trust would suggest that some clarification be provided to this policy to ensure that should there be development outside of the settlement boundary there is not the imposition of the 45dpha requirement as this could result in a significant adverse impact on landscape character and visual qualities. It may be appropriate to add an additional criteria which indicates that densities outside of settlement boundaries will be expected to demonstrate an appropriate level based on surrounding development and landscape character, its sensitivity and capacity.</p>	The density policy has been set so that when development occurs the optimum use of land is made. Many consultees, supported higher densities as this will protect greenfield sites from development in the near term, but some noted that the policy should be subject to the setting and topography and this has been added to the policy wording. The policy applies only to developments of more than 10 homes.	Wording added to Policy.
<p><b>H 3</b> The Trust is concerned that this policy compounds the acceptance that development outside the settlement boundary in the AONB or AGLV is inevitable. Once again the Trust considers that development in these areas should still be strongly resisted, particularly in the AONB and within the setting of the South Downs National Park as the NPPF clearly states that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status protection in relation to these issues." (para 172). In addition, the Trust considers that such development is likely to be considered "major development" under the terms of the NPPF in the AONB and again the Neighbourhood Plan should be advocating a presumption against this to ensure compliance with national planning policy. Consequently, the Trust would suggest that this policy is re-considered and either removed from the next iteration of the Neighbourhood Plan or reworded to ensure a presumption against development in these areas is maintained.</p>	There are exceptions within the NPPF and Local Plan policy that permit development on AONB, AGLV and Green Belt. The NP cannot prohibit development on this type of land so requirements for more sustainable development in these areas should development occur were deemed appropriate.	Wording added to the Context and Reasoned Justification.

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<p><b>H13.2</b> The National Trust supports this policy which recognises the importance of the land that the Trust owns around the town to the community. The Trust supports the recognition that these "green fingers" may require some development to ensure their protection, enhancement and sustainability and is supportive of this being linked to ensuring that any such works look to support its significance to the community.</p>	<p>We appreciate this support! The Local Green spaces and green fingers described in Policy H13 are also now formally recognised as important components of Haslemere's ecological network in Policy H14 and will benefit from the additional protections contained therein.</p>	
<p><b>H14.1</b> The National Trust supports the intent of this policy to preserve and extend ecological networks and green infrastructure throughout the Neighbourhood Plan area including the Trust's land at Devil's Punchbowl and Bramshott and Ludshott Commons to assist with the migration of flora and fauna between not only designated sites but those of more local value and thereby increase local natural capital and ensure the NPPF's requirement of biodiversity enhancement is achieved.</p>	<p>The importance of these NT sites is recognised in the wildlife corridor mapping exercise conducted in support of Policy H14 and reported in the supporting report A 'Biodiversity Audit of Haslemere's Ecological Network' which can be found in the evidence base. Policy H14 has been expanded and strengthened to reflect latest thinking/policy on protecting/enhancing ecological networks at national and local level.</p>	
<p><b>H18</b> - The Trust welcomes the Neighbourhood Plan's recognition that the visitor economy could provide opportunities for expansion of the local economy in the Neighbourhood Plan area. The Trust would welcome the expansion of Policy H18.1 to include an allowance of not only residential dwelling changing use to Use Class C1 but supporting the addition of all types of visitor accommodation (including bunkhouses and camping or glamping) within the Neighbourhood Plan area especially those that are within walking distance of existing facilities in the towns and villages which would benefit from additional visitor in terms of vitality and viability and make use of existing buildings. Haslemere is well placed to provide additional accommodation for the South Downs National Park and again a range of accommodation types should be considered. It is also considered important to ensure that that policy would apply outside the settlement boundary to ensure compliance with para 83 (c) of the NPPF in terms of supporting sustainable rural tourism.</p>	<p>It is agreed that hostels, camping and glamping sites are businesses that would support the visitor economy. This policy does apply to development outside the settlement boundary.</p>	<p>Wording added to Policy</p>
<p><b>CPRE</b></p>		
<p><b>H1.3</b> CPRE Surrey has reviewed the draft plan and applauds the hard work and time which has been taken to produce the plan. CPRE welcomes the commitment to conserve and enhance biodiversity in an area rich in wildlife and strongly supports the Haslemere Biodiversity Project. CPRE has one serious concern with the draft and that relates to Policy H1.3. We do not consider that the Plan should contemplate allocations in the AONB or AGLV even in the limited circumstances outlined in Policy H1.3. As regards the AONB, this would be contrary to the NPPF paragraph 172-- meeting a need in the situation described in the policy cannot be justified as exceptional circumstances for the purposes of paragraph 172. It would also be contrary to the Waverley Local plan and the Surrey Hills Management Plan. Paragraph 55 (The flexibility section on p.53) , in our view, correctly sets out what should happen if allocated and windfall sites are not being developed at a rate to deliver the houses needed in Haslemere within the Plan period. It provides that in those circumstances: "Waverley Borough Council and Haslemere Town Council will work with partners to decide what to do. This could include: ➤ negotiating with land owners/developers around housing numbers, mix, type and tenure</p>	<p>Other responses to the Regulation 14 consultation also indicated that many organisations and a large proportion of the community did not support this policy. Concerns were expressed that it could encourage proposals to come forward for development on land designated as AONB or AGLV.</p>	<p>Policy removed.</p>

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<ul style="list-style-type: none"> <li>➤ negotiating around other site requirements</li> <li>➤ acting as a broker between landowner, developer and community</li> <li>➤ supporting partner bids for funding and/or</li> <li>➤ a partial or whole review of the Haslemere Neighbourhood Plan"</li> </ul> <p>This is a sensible approach. For example one possibility might be to deal with the issue in the next review of the Waverley Local plan by allocating the shortfall to other parts of the borough where there are no constraints. That is likely to be preferable to allocating AONB or AGLV sites in Haslemere. Indeed if the most recent statistical evidence indicates that the current OAN is, at the next review, likely to be materially overstated, the right answer, in order to avoid an oversupply, might be to refuse or defer all pending applications for housing development in the AONB or AGLV to allow for consideration of allocations to meet housing need in the next LP to areas not subject to constraints.</p>		
<b>FFT Consulting Limited</b>		
<p><b>H1.1</b> Settlement Boundary proposed simply reflects the current developed area of the town. It does not allow for any of the extensions proposed within Local Plan (Part 2) Consultations. This seems illogical, given that the NP is leaving the allocation of sites to the Local Plan (Part 2) why not leave the designation of the Settlement Boundary to that Plan? Otherwise the two documents are likely to fall into conflict.</p>	<p>LPP2 will set a settlement boundary that will supercede the boundary in the NP. It is necessary to set a boundary as some policies prescribe different requirements depending on whether the site is inside or outside the settlement boundary.</p>	
<p><b>H1.2</b> The presumption against the development of land that lies outside the Settlement Boundaries, combined with H1.1, will demonstrably make it impossible to meet the required housing requirements.</p>	<p>There are sufficient sites within the settlement boundaries which if built at the densities prescribed by the NP should meet the housing requirement. The Plan Area has always experienced high levels of windfall due to the large plot sizes in much of the residential areas and also because there are numerous small sites which are not considered by WBC for allocation.</p>	
<p><b>H1.3</b> This policy is contradictory. It recognises the need for sites to be brought forward under the Local Plan process, but then suggests that these ‘allocated’ sites could only be developed IF sites within the Settlement Boundary/Windfalls are not delivering at the required rate. As such it is clearly inconsistent with the principle of a Local Plan allocations and fails Basic Condition (e) as it is not in general conformity with the strategic policies in Local Plan Part 1.</p>	<p>Other responses to the Regulation 14 consultation also indicated that many organisations and a large proportion of the community did not support this policy. Concerns were expressed that it could encourage proposals to come forward for development on land designated as AONB or AGLV.</p>	<p>Policy removed</p>
<p><b>H1.5</b> As I mentioned during the webinar the density assumptions made are extremely challenging in the context of viability and the design objectives of the NP. I do not believe that 75dph within 1 kilometre of the station – 45dph within the remaining area can be achieved at the same time complying with policies such as H7.1 and H7.2 as well as others in the NP. As such these aspirations are inconsistent, the approach is inflexible and does not allow for the best practice i.e. that density is a product of the right design for any given site having regard to site constraints, locality etc.</p>	<p>The density policy has been set so that when development occurs the optimum use of land is made. Many consultees, supported higher densities as this will protect greenfield sites from development in the near term, but some noted that the policy should be subject to the setting and topography and this has been added to the policy wording. The policy applies only to developments of more than 10 homes and there is flexibility for developers to provide evidence that the optimum use of the land has been achieved where the site density is less than that required by the policy.</p>	<p>Policy reworded</p>

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<p><b>H2 Development outside the settlement boundaries on existing built land.</b> In seeking to restrict development in this way the policy is not consistent with NPPF policy guidance for the relevant land designations and is not in general conformity with the Local Plan Part 1. It therefore breached Basic Condition (e).</p>	<p>This policy has been combined into H1.2 and reworded it is consistent with NPPF and Local Plan policy.</p>	<p>Policy wording amended.</p>
<p><b>H3 Sustainable development outside the settlement boundaries and inside on designated land</b> This policy adds a range of additional burdens and impediments to the development of sites which if they are to be developed, following the broader requirements of the Plan, will only have been brought forward and delivered if essential to meet housing need. They also go beyond NPPF and Local Plan guidance</p>	<p>Climate change is a significant issue and Haslemere Town Council have declared a Climate Emergency. H3 ensures that any development that occurs within areas of landscape character, outstanding natural beauty, great landscape value and green belt harmonises with its surroundings and minimises its impact and disruption of the ecology and habitat that surrounds them.</p> <p>Given the residual land values in the WBC Viability Study (June 2017) were £1.86 m per ha for greenfield land versus £3.38 m per ha, there is sufficient resource to implement this policy without harming viability.</p>	
<p><b>H4 Consultation Requirements</b> It is unreasonable for a developer to be asked to prepare a “Development Brief” at the pre-application and application stage and arguably duplicates the normal Design and Access Statement process. Furthermore, there is already a requirement for Statements of Community Consultation, which ensures that local views are both canvassed and reflected. As such this requirement is unnecessary, goes beyond the normal requirements of the NPPF and is therefore contrary to Basic Requirements (a,d &amp; e)</p>	<p>This policy received strong community support. The challenges of locating documents on the planning portal were noted by some. A development brief will not require any additional information to be prepared but just require that pertinent information is collated and presented to local residents. Other communities have implemented such a policy (Ascot, Sunninghill and Sunningdale).</p>	
<p><b>H5 Managing the volume of windfall developments</b> The assessment of and assumptions for ‘windfall development’ are matters for WBC policy in the Local Plan. As such this policy fails the test of the Basic Conditions (a&amp;e). It is also illogical given that such sites are self-evidently a limited resource and cannot therefore be expected to yield a consistent level of delivery, as they say ‘past performance is not a guarantee of future performance’!</p>	<p>The WBC Land Availability Assessment (May 2018) lists 65 sites in the Plan Area that are below the 5 unit threshold and so are not considered as potential sites to allocate. It is therefore very likely that the high levels of windfall development in recent years in Haslemere will continue. With an average annual windfall rate since 2013 of 44 homes and the lack of large sites to allocate, windfall is expected to continue to make a significant contribution to delivering the houses Haslemere needs.</p> <p>The following word are from the report of an independent planning consultant employed to perform a Health Check of the NP. “It is entirely appropriate for the Plan to make an assumption on the supply of new dwellings from windfall sites which reflects local evidence of how many have come forward in recent years.”</p>	

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<b>H7 High quality external design</b> H7.2 How can the requirement for additional green space be consistent with Policy H1.5? It would surely make the relevant density requirements unachievable.	It is likely that many developments within the NP area would already meet the Natural Green Space Standards. The policy has therefore been amended to cover only developments where this would not be the case. Policy H1.5 has also been amended to provide some flexibility in its application.	H7.2 reworded
<b>H9 Provide sufficient affordable housing of the right type</b> H9.2 Whilst in my view a worthy aspiration, the requirement to “safeguard a proportion of the affordable homes from future sale and maintain affordability of the homes in perpetuity” is sadly not a requirement of National Policy or the Local Plan, it therefore fails Basic Conditions (a & e)	This policy has “regard to national policies” and is in ‘general conformity with the strategic policies’ of the Local Plan. It does not convene any of these policies.	
<b>H10 Provide an appropriate mix of housing types</b> H10.2 This constitutes a barrier to the viability and delivery of windfall sites by artificially limiting the range of development options.	The policy is not deemed to be so restrictive that it will prevent the delivery of windfall sites.	
<b>H11 Habitat protection</b> This policy is in clear conflict with the density requirements of Policy H1.5.	Policy H1.5 has been redrafted to allow some flexibility for developers to demonstrate that they have made the best use of land.	
<b>H13 Local Green Spaces (within settlement boundaries)</b> H13.2 – In some instances these ‘green spaces’ may offer development opportunities which are preferable in landscape terms and more sustainable than alternative sites (possibly outside the Settlement Boundary) which may otherwise need to be allocated to meet housing need. The additional protection given to these areas may therefore be counterproductive.	Evidence has been gathered to demonstrate that each of these sites are demonstrably special to the local community and hold a particular local significance because of their beauty, recreational value, and/or richness of its wildlife. For these reasons local residents support their protection.	
<b>H17 Retaining, enhancing &amp; managing changes to retail</b> H17.1 – I believe that this is inconsistent with NPPF requirements.	Noted	Policy removed
<b>Surrey County Council – Environment, Transport and Spatial Planning Team</b>		
<b>Policy H3: Sustainable development outside the settlement boundaries and inside on designated land</b> This policy mentions ‘on site water storage’ but it is unclear whether this is referring to rainwater harvesting or the collection of surface water for flood attenuation. Rainwater harvesting should include the use of sustainable drainage systems (SuDS) to manage the quantity of surface water runoff. It is suggested that the policy might include reference to the need for landscape assessments to be carried out to ensure that development schemes seek to conserve and enhance existing landscape character and quality in addition to biodiversity value.	Policy wording altered to refer to SuDS. Policy wording altered to include the conservation and enhancement of landscape character and quality.	Policy wording amended
<b>Policy H4: Consultation requirements</b> This policy should include reference to the requirement for an archaeological assessment and heritage statement to be submitted with the planning application.	Policy wording altered to refer to identification of historical and archaeological features.	Policy wording amended
<b>Policy H7: High quality external design</b> It is suggested that the policy H7.1(i) be amended in order to encourage developers to use drainage systems that deploy sustainable drainage techniques. We suggest the wording of the policy is amended to include the emboldened red text as follows: “Ensuring <b>sustainable surface water</b> drainage solutions <b>are utilized where reasonably practicable</b> that delay or prevent surface rainwater egress from the site.”	Agreed	Policy wording amended

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<p><b>Half Moon Estates Residents' Association</b> Policy H1                      The Association holds the strong view that new developments at higher densities within the settlement boundary MUST respect the character of the area which also preserves the character of the town as a whole.                      Respect for the character of the area is specifically acknowledged in:</p> <ul style="list-style-type: none"> <li>• the Key Objectives of the Plan namely “ to encourage development of high quality socially and environmentally conscious housing that meets the needs of the community and respects the character of the area.”</li> <li>• the Principles of the Plan “Preserving the character of the town”</li> <li>• in the “ Context and Reasoned Justification’ to Policy H1 where it states “....the Campaign to Protect Rural England supports building at higher densities to reduce urban spread and make a more efficient use of land.</li> </ul> <p>It recognises that densification should respect the character of the local area. Better use could be made of brownfield sites by allowing more storeys in a development where it can be done in a manner which is sympathetic to the surrounding environment. “</p> <p>Policy H1.5                      Policy H1.5 does not accord with the Key Objectives of the Plan nor with the Plan Principles as it makes no mention of the character of the area. Having consulted with our residents we conclude that this policy is not supported by the Association. The Policy as drafted is a blanket , “one size fits all” policy. For some sites, the minimum densities proposed will be appropriate, but for other sites the proposed densities will completely change and not respect the character of the area. The policy as drafted is unsuitable and does not accord with one of the Key Objectives and Principles of the Plan.                      As an example, this policy would require a minimum of 70 dwellings to be built on the site of the former Haslemere Preparatory School in Hill Road. The density of such a development on a sloping site, in a no through road with no pavements and difficult access would be completely out of character for the area. In order for the Association to support this policy it would need to be changed to state that the minimum number of dwellings would not apply where these densities do not respect the character of the area or where the topography of the land would make them inappropriate.                      The Plan also needs to clarify whether existing policies—for example the Haslemere Hillside Policy take precedence over the proposed Plan policies. In the view of the Association pre-existing policies should take precedence.</p>	<p>Additional wording has been added to the density policy to state that it should be applied subject to achieving high quality design and being fit for the site’s setting and topography. The policy has more flexibility allowing developers to demonstrate how development at lower than the required densities is the optimum use of the land. The policy has been separated out and more detail added to the context and reasoned justification. The NP policies do not replace local plan policies and so the Haslemere Hillside policy and Conservation area policy apply in the relevant areas.</p>	<p>Policy wording amended.                      More detailed Context and Reasoned Justification.</p>
<p><b>Half Moon Estates Residents' Association</b>                      Policy H5 - This policy relates to managing the volume of windfall developments ie. infilling, conversion of a dwelling into multiple units and conversion of retail or commercial space into flats. The windfall development that has occurred in the town centre recently has not required parking provision for these developments. There are many examples such as the flats above Caracoli or above the former Barclays Bank premises. Whilst the conversion of the areas above retail into residential accommodation is supported, the failure to require parking provision is not. Residents of such windfall developments that own vehicles, either purchase season tickets for the town centre car park, thereby reducing parking for shoppers or alternatively park “on street “ in residential roads causing significant congestion on the roads around the town centre.</p>	<p>All planning applications should aim to comply with all the Neighbourhood Plan policies. Policy H9.1 states that all proposals for new housing should provide sufficient off-street car parking.</p>	

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<p>In the view of the Association this policy should be amended so that either additional town centre parking availability is introduced before any additional town centre windfall developments are allowed or such windfall development is required to include sole parking provision.</p>		
<p><b>Half Moon Estates Residents' Association</b> Policy H13 The woodland bounded by Shepherds Hill, Lower Street and Sandrock is one of the "green fingers" close to the town centre and the Association would recommend this land being designated as a green space.</p>	<p>We support this recommendation and the site is put forward for 'green finger' designation.</p>	<p>This site has been added to the list of designated green fingers.</p>
<p><b>Half Moon Estates Residents' Association</b> Policy H17.2 In the view of the Association this policy should be amended to require that change of use to residential will only be allowed if there is sole use parking provision or that Waverley B.C. has already provided additional off street parking provision in the town centre.</p>	<p>Policy H9.1 states that all proposals for new housing should provide sufficient off-street car parking.</p>	
<p><b>Half Moon Estates Residents' Association</b> One of the key challenges recognised by the Plan is parking. The Plan states:  <ul style="list-style-type: none"> <li>• That in the centre of Haslemere these problems are compounded by the number of station users parking on streets in a wide radius around the station with limited land available to accommodate increased off street parking</li> <li>• The station currently has 3000 rail users and 900 cars every weekday, 550 of which use the nearby car parks and the remainder park in roads near the station</li> <li>• Commuter traffic is expected to grow by 450 as well as significant growth in off peak rail use by 2032</li> </ul>                     The Plan includes policies which aim to limit growth in traffic but does not propose any immediate solutions thereby accepting that the parking situation in Haslemere will get considerably worse. This situation is not acceptable to residents. Despite the Plan stating that limited land is available around the station to accommodate increased parking, it does not address situations where better use could be made of existing land already used for parking. For example—at the Station car park, Weydown Road car park or the Town centre car park. These car parks could either be extended or additional levels could be built.                      Encouragement of development and support in the Plan and in the planning process to the implementation of the above proposals would:  <ul style="list-style-type: none"> <li>• provide badly needed assistance to the local economy by reducing town centre parking congestion</li> <li>• enable Town centre and WeyHill shoppers and shop workers more free parking opportunities and</li> <li>• provide a better environment for local residents.</li> </ul>                     The proposals would be consistent with Neighbourhood Plan legislation relating to land use. It would also encourage rail usage, thereby reducing carbon footprint and be consistent with the Governments' Green agenda to reduce greenhouse gases.</p>	<p>Commuter parking: The Plan cannot address on-street parking and parking management other than by supporting developments that including opportunities with strong community support within the Opportunities in Section 5 of the Plan. It should be noted that providing large portions of additional station parking is considered by some residents to be encouraging more railway patronage and there are significant views against.</p> <p>A new policy H9.5 supports additional off-street parking for shoppers and residents.</p>	



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<p>H9 - We support the Affordable Housing policy and stand ready to assist developers in ensuring a proportion of affordable homes built in the area remains locally affordable in perpetuity. And by “affordable”, we mean “genuinely affordable” – as opposed to something like 80 per cent of market value – and we would wish to see this aspiration adopted and spelled out in the Plan (see below). We want to see as many new homes as possible to be realistic propositions for our local workers and young people.</p>	<p>Further information about the affordability of homes in Haslemere has been added to the Context and Reasoned Justification including an explanation of the term “genuinely affordable”</p>	<p>Changes made to Context and Reasoned Justification.</p>
<p>Haslemere Community Land Trust is grateful to Haslemere Vision and, in particular, its former Chairman Stewart Brown for the inspiration and help in setting up our group in 2016. Soon after its inception we registered Haslemere CLT as a Community Benefit Society with the Financial Conduct Authority, in accordance with the Housing Regeneration Act 2008 – and thus Haslemere CLT became the only CLT that can be registered with the object of pursuing affordable housing in the Neighbourhood Plan area.</p> <p>As a result, we feel the wording in Policy 9.2 should be changed to “the Haslemere Community Land Trust or its successors, to safeguard...”. We also suggest the description of Haslemere CLT in Policy H9 Context is updated to read “recently formed” (instead of “newly formed”); and, in summaries and Delivery statements, a change from “Community Land Trusts” to “Haslemere Community Land Trust”. Also, we contend, reference(s) to “a community land trust” should be changed to “the town’s community land trust”.</p>	<p>While we support the work of the Haslemere Community Land Trust, our Planning Consultant advised that the policy should not refer to a single named community land trust.</p>	
<p>In order to stress the importance of local affordability, we recommend changing the second statement in Policy H9 Intent to “a proportion of the area’s affordable housing is genuinely affordable and will remain so in perpetuity.”</p>	<p>Agreed</p>	<p>Intent wording changed</p>
<p>Perhaps the Affordable Housing Glossary would be a suitable place to include a useful definition of “genuinely affordable” in our local context? This is our recommendation: “‘Genuinely affordable housing’ (also sometimes called ‘locally affordable housing’) means housing affordable to those on local incomes such that housing consumes no more than 35 per cent of net household local income dependent on household size and type.”</p>	<p>Further information about the affordability of homes in Haslemere has been added to the Context and Reasoned Justification including an explanation of the term “genuinely affordable”</p>	
<p>As the only community organisation capable of delivering affordable housing, we are disappointed to find our name missing from the list of Community Organisations in the item Opportunity 1. We hope this is an oversight that can be rectified. Opportunity 2 refers to “community land trusts” – and, again, we would rather it read “Haslemere Community Land Trust” or “the town’s community land trust”.</p>	<p>Agreed</p>	<p>Opportunities wording changed</p>
<b>Highways England</b>		
<p>In relation to Opportunity 11: Reduction of traffic in central Haslemere, “Measures should be encouraged to reduce through traffic in Haslemere by diverting it around the town via the A3/A287.” we recognise the ambition to reduce through traffic by diverting it around town via A3/A287. This would need to be discussed and agreed with Surrey County Council as local highway authority to determine deliverability, who will consult Highways England to ensure there would be no potential adverse impacts to the A3 and its users.</p>	<p>Noted.</p>	

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<p><b>Historic England</b></p> <p>We feel that at present the vision sets out a desire for what the plan should be rather than a vision of how the area should have changed or developed by the end of the plan period and that, as such it doesn't currently fulfil the purpose of a plan vision.</p> <p>We feel that at present it does not describe how the architectural, historical, archaeological or artistic heritage of the area will have been conserved, enhanced and/or enjoyed, including how it will have been integrated with and will have contributed to the quality of new development and local character and distinctiveness. The present vision reads as the councils aspirations for the plan rather than the plan area and, as such, doesn't really provide a clear strategic overview from which the objectives are derived as steps to meeting its delivery.</p> <p>Similarly the objectives read as they are described, as being priorities rather than a clear series of 'milestones' to be achieved through the plan policies and against which the plan can be tested. Whilst it is up to the community to determine their agenda for the neighbourhood plan we would encourage you to include a clear objective that sets out how the plan should direct the conservation of local historic character and the conservation of the area's heritage assets. This is the best way to provide a robust foundation for policies directed to conserve heritage within the plan and to influence other documents that could affect its delivery.</p> <p><b>Plan Context and Preserving the Character of the Town</b></p> <p>We recognise the difficult circumstances that the Haslemere plan is being developed within, with the constraints of landscape designations meaning that difficult decisions about the location of new development are imminent and a likelihood that increasing density of development will be necessary to meet the need for development. We feel it is likely that some review of these designations may be needed in future to reflect this pressure and would consider it appropriate to consider how the pressure to protect the special areas within the urban area and the amenity of its residential areas should be taken into consideration in such a review. As such we support the identification of the need to preserve the character of town (page 13) as a key direction in the preparation of the plan – we would encourage you to consider how this should be reflected in the vision and objectives (see above), as well as subsequent policies.</p>	<p>The Vision statement is concise but along with the objectives, which includes that development should respect "the character of the area" and the principles, which include "Preserving the Character of the town", the importance of the architectural and historical heritage of the area is conveyed.</p> <p>Haslemere Neighbourhood Plan area includes 6 settlements (Haslemere, Hindhead, Beacon Hill, Critchmere, Grayswood and Shottermill) each of which have distinctive features. The Haslemere Design Statement divides the area into 8 character areas and policy H7 High Quality Design requires development to comply with the Haslemere Design Statement.</p>	
<p><b>Policy H4</b> We recognise the value of development briefs in guiding new development to reach a high quality and, in particular to integrate with surrounding settlements and to avoid negative effects from poor planning and integration with local infrastructure. We recommend that the policy include details of how the development brief should be agreed with the Parish Council and Local planning authority before the commencement of detailed planning work to ensure that it meets the requirements of the community.</p>	<p>H4 is now H8 Agreed. Wording added to policy mentioning involvement of the Town Council and relating to circumstances when outline planning permission is sought.</p>	<p>Policy wording amended</p>
<p><b>Policy H7.1</b> We recommend considering whether the policy wording is confusing in drawing attention away from the design guidance provided by the Haslemere Design Statement by providing the bullet pointed policy requirements, which seem to be stated as the means of achieving the design advice, rather than additional to it. Where the design advice is currently located in a separate document we recommend moving the "Design and Architectural Design Guidelines, Local Vernacular Design Guidelines and eight sets of Design Guidelines each relating to a specific area of the town" referred to in the justification into a technical appendix if not into the body of the document so that it can be read more readily as a part of the plan and more immediately acted on by decision makers (a document in</p>	<p>Agreed. Policy wording simplified and web address of Haslemere Design Statement added.</p>	<p>Policy wording amended</p>

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addition to the local plan and neighbourhood plan is less likely to be considered by developers and planners).		
<b>Historic England</b>		
<p><b>Policy H13</b> We note that the proposed Town Meadow Public Green Open Space lies within the Haslemere Conservation Area and, presumably, contributes to its significance. It would be relevant to identify this (including any historic significance it has in identifying its suitability for the Local Green Space Designation so that it is taken into consideration in future decisions.</p>	The historic significance of this site as part of the Haslemere Conservation Area is noted in the supporting ‘Local Green Spaces and Green Fingers Assessment’ paper included in the evidence base.	Historical significance noted in supporting assessment paper.
<p><b>Policy H17</b> We recognise that High Street West and West Street lie within the Haslemere Conservation Area and that their historic commercial character is an important element of the character or appearance that is considered desirable to preserve or enhance. Given the weight given to the conservation of a designated heritage asset (such as a conservation area) in planning decisions, we recommend making it clear that the proposed article 4 direction is a management proposal that will allow the better management of the impact of change on the conservation area. However, to better inform decisions we do recommend making it clear how decisions affecting ground floor shop units should be considered in implementing this additional control. I.e it is well and good to have the control, but a policy direction is still required to guide its use.</p>	<p>The policy to obtain Article 4 Directions has been removed as we have been advised that it is not a planning policy matter.</p> <p>It is likely that given the protection the Conservation Area policy affords an article 4 direction will not be sought for the High Street and West Street Areas.</p> <p>Old policy H17.2 has been reworded to more clearly explain the protection it provides.</p>	Policy wording amended
<p><b>Policy H18</b> Whilst we support the conversion of historic buildings to new uses to ensure their continued use, the conversion of residential properties for hotel use can be problematic in historic buildings including listed buildings where substantial extensions can seriously affect the character of buildings and their relationship within their surroundings. We feel a note of caution would be appropriate in this policy to ensure that consideration is given to whether this type of use would represent an acceptable use for a designated heritage asset or whether the benefit provided could result in unacceptable harm that is not justified. Ideally, this should be determined based on the provision of a suitable heritage assessment as a supporting document to an application although a decision should be based on a balanced judgement including the expert input of the Council’s conservation officer and, potentially, the Town Council.</p>	Policy H18.1 has been removed.	
<b>Surrey Hills AONB Board</b>		
<p><b>Policy H1: Designation and purpose of the settlement boundaries.</b> <b>H1.3</b> The intentions behind the policy are supported in so far as they are to avoid or limit the amount of AONB/AGLV land that might have to be released to meet the Waverley Local Plan Part 1 allocation of 990 dwellings to be provided within the plan period. It goes on to state any such site allocated for development in Local Plan Part 2 should only be brought forward for development if it can be demonstrated that the planned development of houses is not taking place at a rate commensurate with achieving the overall housing provision over the Plan period as set out in the Table set out under the policy. However, it would be clearer and firmer if the policy stated that any housing allocations within the AONB and/or AGLV were “reserve housing sites” only to be permitted for development if clearly housing development within the Neighbourhood Plan area was not coming forward at a rate to meet the Plan’s housing allocation of 990 dwellings. To achieve the NP’s intentions, in practice the sites need to have a different status to the other housing allocations in Local Plan Part 2 and be subject to a separate reserve housing site policy.</p>	<p>Policy H1.3 has been removed and replaced with a presumption against building on designated land except for on previously built land.</p> <p>As the NP is not allocating sites it cannot designate reserve sites. However, efforts will be made to ensure sites in AONB/AGLV are designated reserve sites in the local plan.</p> <p>Windfall development continues to make a significant contribution to the housing allocation.</p>	Policy wording amended.

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<p>Reserve housing sites have been used before in Local Plans to control the release of Green Belt sites. For instance, they featured in the two Dorking and Leatherhead Local Plans where none had to be released for over 25 years because housing development was taking place at a rate sufficient to meet requirements. Any housing allocations involving AONB land are likely to have to be considered as “major development” exception sites and be subject to the 3 tests set out in NPPF paragraph 172. These include the need to demonstrate there are no other suitable sites. If other sites outside the AONB are coming forward for development at a higher rate than the Plan had anticipated then their early release would seem to conflict with that Government advice giving great weight to conserving and enhancing the landscape and scenic beauty of AONBs. In this regard it is noted that at the time of the current NP 450 of the 990 dwellings allocated to Haslemere in Local Plan Part 1 have been achieved by 2018 which indicates that housing permissions for Haslemere have already been coming forward at a higher annual rate than necessary to meet the total of 990 dwellings by 2032. Planning permissions for sustainable housing on windfall sites within the built up areas or on brownfield sites elsewhere cannot be refused because their development would result in more than the total of 990 dwellings. But sites on AONB and/or AGLV can be given in the Local Plan a reserve housing status .</p>		
<p><b>Policy H3 - Sustainable development outside the settlement boundaries and inside on designated sites.</b> As the Surrey Hills AONB Management Plan is a formally adopted Plan and a material planning consideration it is suggested the policy should refer to any development proposals within the AONB being required to accord with the Plan. There are policies in the Management Plan that are relevant to the intentions behind the policy.</p>	Agreed.	Changes made to Context and Reasoned Justification.
<p><b>Policy H7 – High quality external design.</b> The supporting text could refer to the Surrey Hills publication “Environmental Design Guidance” on the Board’s website.</p>	Noted. The Surrey Hills Environmental Design Guidance is similar to the design guidance in the Haslemere Design Statement.	
<p><b>Policy H11 - Habitat protection.</b> This policy could be retitled and strengthened as greater recognition is being given by the Government and others to climate change, nature recovery, environmental net gain and biodiversity net gain. See also comment below on Policy H14.</p>		H11 Policy title changed to Trees, Woodland and Hedgerows. Policy wording amended
<p><b>Surrey Hills AONB Board</b></p>		
<p><b>Policy H12 - Dark skies.</b> This policy is strongly supported with the greater importance being given to protecting dark skies from light pollution. This is especially so in the Surrey Hills AONB and the new Surrey Hills AONB Management Plan has given greater emphasis to protecting darker skies. The colouring of the suburban sites in the Plan could be clearer.</p>		Policy map quality improved
<p><b>Policy H14 - Wildlife corridors and stepping stones.</b> This policy is supported and together with Policy H11 - Habitat protection could be reviewed to incorporate fast moving and evolving recognition to climate change, nature recovery, environmental net gain and on and off site biodiversity net gain. There is scope with the substantial uplift in land values arising from the development of greenfield sites to require at the outset developer contributions to environmental net gain over and above CIL and affordable housing measures.</p>	This policy has been substantially revised and strengthened to reflect rapidly evolving thinking and policy on natural capital protection including biodiversity net gain. A desk-based audit of Haslemere’s ecological network has recently been completed and underpins the revised policy. Policy H14 has been extensively revised in the wake of the biodiversity mapping project and discussions with Surrey Wildlife Trust, Natural England and other ecology experts.	Policy wording amended and title changed.

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	It has also been re-titled 'Protecting and enhancing biodiversity through Haslemere's ecological network'.	
<p><b>Surrey Wildlife Trust and the Surrey Nature Partnership</b></p>		
<p><b>Policy H3: Sustainable development outside the settlement boundaries &amp; inside on designated land.</b>            This policy is welcomed, especially the regard paid to protection, management and enhancement of biodiversity, as well as reducing the impact of developments on ecology and habitats. Suggested additions to clause (f) here, include the following;            "provisions for the enhancement of an appropriate parcel of land within the Plan area in a manner that will increase wildlife and ecological value <b>to achieve a demonstrable, measurable net gain in biodiversity</b>, if the development proposal causes <b>unmitigable</b> losses of priority habitats or <b>otherwise</b> compromises biodiversity."</p>	Policy has been enhanced.	Policy wording amended
<p>Policy H11: Habitat protection. "This policy aims to conserve and enhance the habitats and their component biodiversity within the Plan area by: protecting ancient woodland, veteran trees, and species-rich hedgerows." This policy is welcomed, but the list of habitats appears inexplicably restricted. There are other important wildlife habitat-types occurring within the Plan area, such as heathland, acid and neutral grasslands, ponds and other wetlands; and it is unclear as to why the list would omit these.</p>	Policy H14 focuses on biodiversity and protecting/enhancing the local ecological network. This addresses all the important wildlife habitat-types occurring within the Plan area.	H11 Policy title changed, wording amended.
<p>Policy H14: Wildlife corridors and stepping stones. This policy is wholly welcomed. Incidentally, the policy is titled "Protecting the migration routes for wildlife" in the Delivery &amp; Monitoring chapter</p>	Noted. The support for this policy is welcomed.	
<p><b>Thames Water</b></p>		
<p><b>PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT</b>            "Where appropriate, planning permission for developments_ which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades. The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development"</p>	There have been water supply issues in Haslemere recently. Policy 10.1 added.	New policy H10.1 included
<p><b>Proposed policy text:</b>            "Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."</p>	WBC Local Plan part 1 policy CC3 requires that new dwellings should not exceed 110 litres per head per day.	

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<p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</p>	<p>Policy H3 Sustainable development outside the settlement boundary includes the following in relation to water:                      “onsite water storage and sewage treatment, the use of sustainable drainage systems and grey water systems”</p> <p>and Policy H7 High Quality External Design includes:                      “ensuring sustainable surface water drainage solutions are utilized where reasonably practicable that delay or prevent surface rainwater egress from the site.”</p>	
<p><b>South East Water</b></p>		
<p>South East Water consider that it is important and agree with Haslemere Town Council on the points raised as part of the Neighbourhood Plan objectives and would like to add that water efficiency could also be promoted to existing buildings and new buildings, either residential or non-residential across the Council.</p> <p>South East Water recommend the need of a mandatory housing standards for water use which would support water efficiency on new buildings and promote the collaboration between Haslemere Town Council, Waverley Borough Council and developers.</p> <p>South East Water support the idea, adopted by many local authorities in the South East of England on their local and neighbourhood plans, of the promotion of water efficiency as part of the Local/Neighbourhood Plan. All dwellings should need to meet a requirement of 110 l/p/d. We advise that the Town Council should include a policy that all residential and non-residential development shall meet the water efficiency standard of 110 litres/person/day (preferably lower).</p>	<p>WBC Local Plan part 1 policy CC3 requires that new dwellings should not exceed 110 litres per head per day.</p>	
<p>South East Water will work with local authorities and developers to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure.</p> <p>South East Water would like to reiterate that our primary concern is the water that we abstract and treat for public supply purposes and ensuring that the surface and groundwater abstracted does not fall below the tolerances of our water treatment works or the drinking water standards set by our regulators.</p> <p>South East Water would like to be kept updated with any developments relating to Haslemere Town Council Neighbourhood Plan and we have noted above a number of areas where we welcome an opportunity to meet and discuss with the Council. We look forward to working with Haslemere Town Council and Waverley Borough Council to ensure that drinking water supplies remain protected in the area in the future.</p>	<p>Based on these comments and similar ones from Thames Water, Policy H10.1 has been added.</p>	<p>New policy H8 included</p>

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<p><b>Plan Principles</b>                      HSRA is supportive of the Plan's Principles and is encouraged that the Haslemere Design Statement is referenced and reiterated as incorporated into the Plan and its Policies.                      Please note that the expression "extraordinary circumstances" which is used in the setting the context for the Principles must not be read as synonymous with, or confused with, the expression "exceptional circumstances" as defined in the National Planning Policy Framework. If there is a risk of confusion, it is recommended to substitute it with "the Plan area's particular circumstances".</p>	Noted – wording changed to "For this reason..."	Wording changed
<p><b>H 1 - Context</b>                      The Context includes a misleading assumption that fundamentally undermines the role of the Plan in the preparation of WBC's LPP2. HSRA does not agree that it is correct to imply an automatic equation between WBC's delineation of the Settlement Boundary and housing numbers. Our understanding is that WBC will provide input to the finalisation of the Neighbourhood Plan, which will itself include the basis for meeting housing needs within the Settlement Boundary, and that that reconciled position will ordinarily be adopted within the finalisation of LPP2, rather than the other way around.                      Accordingly, the sentence that reads, "If delivery of new homes falls short Waverley Borough Council may need to review and set new settlement boundaries in their Local Plan 2 which would supersede the boundaries set in this Plan" must be deleted.</p>	The boundaries set in the last plan to be adopted will be the final boundaries. It is unclear at this time whether the Local Plan part 2 or the Neighbourhood Plan will be adopted first. In preparing the NP it has been demonstrated that the housing allocation can be accommodated within the settlement boundaries set in the Neighbourhood Plan. However, this is based on windfall assumptions that are slightly higher than the ones used by WBC in LPP1. However, even this higher rate is much less than the average rate in recent years.	
<p>H1 - Intent                      HSRA recommend inserting a qualifying sentence which states the intention to prioritise higher density development close to the shops and station to support a thriving town centre, and use of brownfield and existing built areas, before any consideration of allocation of protected landscapes, in accordance with Government planning advice. Without this statement the door opens too easily to building large developments on protected (e.g. AONB/AGLV) land which goes against the Haslemere Vision and Neighbourhood Plan philosophy, and the NPPF.</p>	<p>Policy H1.5 on density has been moved to H2. The comments relating to rewording the Intent have been considered.                      H1.3 relating to AONB/AGLV sites being defined as reserve sites has been removed.                      Responses to the Regulation 14 consultation indicated that many organisations and a large proportion of the community did not support this policy. Concerns were expressed that it could encourage proposals to come forward for development on land designated as AONB or AGLV.</p>	H2 Density Policy – Intent wording amended
<b>Haslemere South Residents' Association</b>		
<p><b>H1.2</b>                      For this policy to respect the Intent of H1, the wording needs to be stronger. The term "there will be a presumption against the development" can be interpreted as setting mere recommendation rather than a requirement and thereby dilutes, if not undermines, the intended position and outcome. HSRA believes that the policy must state that protected greenfield sites outside the settlement boundary will only be allowed to be even considered for development after all brownfield and higher density sites within the settlement boundary have been exhausted, consistent with clause 172 of the statutory NPPF framework. In addition, consistent with the views of the c.90% majority of the community per the Haslemere Vision Phase 2 Consultation, any new development that could be contemplated on greenfield sites outside the Settlement Boundary could only be modest (i.e. up to 10 dwellings). In any event, if a presumption is to be rebutted, the basis for any acceptable rebuttal must be clearly set very high indeed, and at a level that is at least just as high as for the Local Green Spaces and Green Fingers</p>	There are exceptions in National and Local Planning rules that permit development in Green Belt, AONB and Countryside beyond the Green Belt. The NP must be in conformity with these "higher" planning rules in order to meet the Basic Conditions.	

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<p>identified under policies H13.1 and H13.2 (which are stated to benefit from an equivalent protection to green belt).</p> <p>Any AONB development regardless of Settlement Boundary status should only be considered when all other sites are exhausted and should be considered as the final option, not the first simply to meet the numbers early. The legal ruling from the Longdene House case should be reflected and applied in any such consideration, namely that housing numbers are not in themselves adequate cause to build on AONB.</p> <p>It is right for the Plan to identify a tension with respect to balancing factors, but this is already set out in the Context and elsewhere, without the need to default to a diluted policy statement.</p>		
<p>H 1.3 No, do not support. This policy is not needed, is misleading and should be deleted – it is a self-fulfilling prophecy which anticipates an outcome that is at odds with the Intent and Principles. Future development on protected greenfield sites must never be a simple function of housing number quotas. Ideally policy H1.3 should be removed as it contradicts the key statement of the Plan. It is far preferable to rely upon the criteria in the NPPF for any exceptions rather than trying to detail them in the Plan. A replacement policy H1.3 would need to be tightened to read “Development shall not be permitted on AONB or AGLV land”. The word “normally” is imprecise and misleading and should be deleted, and conflicts with National planning policy guidance as set out in the NPPF. In addition, any version of H1.3 would need to maintain protection at the same level as for Local Green Spaces and Green Fingers (see comments below re. policy H13); this means that the following wording from policy H13.1 should be inserted in policy H1 as well: “Proposals that protect, enhance and sustain these [AONB/AGLV] in a way which is consistent with its significance to the local community will be supported.” Note that reduction or destruction of AONB/AGLV would not be supported, therefore. It is HSRA’s understanding that the requisite housing numbers can be met if WBC enforce the density rules on developments close to the retail centres and the station. The Plan comes first and planning applications subsequently, during the life of the Plan – the Plan should not be prepared by reverse engineering to suit anticipated applications.</p> <p>It is not clear that there is a hierarchy between H1 and H2. HSRA is of the view, consistent with the Haslemere Vision Phase 2 Consultation results, that greenfield sites should benefit from greater protection than brownfield sites (equivalent to “Previously Developed Land” in the glossary). For this to be the case, the derogations from policy H2 in terms of the possibility of new building structures or distinct dwellings should be prioritised over derogations from policy H1 insofar as H1 seeks to protect greenfield land. As stated, as a matter of policy, no new development should in any event be allowed on greenfield AONB/AGLV while brownfield and higher density sites within the settlement boundary remain unutilised.</p> <p>HSRA recommends that the Neighbourhood Plan adopt WBC’s policy that states that AGLV must benefit from an identical level of protection as AONB, pending classification as AONB by Natural England.</p>	<p>H1.3 relating to AONB/AGLV sites being defined as reserve sites has been removed.</p> <p>Responses to the Regulation 14 consultation indicated that many organisations and a large proportion of the community did not support this policy. Concerns were expressed that it could encourage proposals to come forward for development on land designated as AONB or AGLV.</p> <p>All Local Plan policies apply on addition to the Neighbourhood Plan policies</p>	



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<p><b>Haslemere South Residents’ Association</b>  <b>H 1.5</b> The concept of encouraging certain levels of housing density is supported, but as it stands this policy would undermine and not assist the achievement of positive development that enhances our town.                      The policy’s designation of a zone 1km from the station in relation to density is not a suitable catch-all and so a zone should be defined by roads or locations. The problem with a fixed 1km zone is that significant parts of the zone would not be suitable for high density development due to reasons relating to factors such as topology and road access. By way of example, the area could be defined by reference to roads, such as Midhurst Road to the south, Three Gates Lane to the north, High Street to the east and Sturt Road to the west, etc.                      There are no caveats in this policy and no references to the need to take into account the material considerations that all development sites have. A blanket policy like this, which supports development based on a numerical figure with no requirement to consider other issues will lead to inappropriate developments, or failing that if schemes are refused, developers appealing and challenging decisions much more often. Each site has its own considerations/restrictions etc. in its particular context in the town, not least due to issues such as topography, views, access, residential amenity and relationship to neighbours, highways and safety considerations etc. This policy as it stands gives strength to developers but weakens the LPA position significantly; the policy needs to be more sophisticated, otherwise it will make it extremely hard for WBC to control entirely unsuitable developments.                      Having said the above, HSRA agree that all new developments above 10 dwellings throughout the Plan are considered for any final dph rules.</p>	<p>Many consultees, supported higher densities as this will protect greenfield sites from development in the near term, but some noted that the policy should be subject to the setting and topography and this has been added to the policy wording. The policy applies only to developments of more than 10 homes and there is flexibility for developers to provide evidence that the optimum use of the land has been achieved where the site density is less than that required by the policy.</p>	<p>Policy wording amended</p>
<p><b>Haslemere South Residents’ Association</b>  <b>H 2</b> See comments above in relation to ensuring that brownfield sites are developed before greenfield sites and therefore derogation from policy H2 must be prioritised over derogation from policy H1 – in other words, development on brownfield or existing built areas should be sympathetically developed (with the required housing densities) before any greenfield or AONB/AGLV sites are considered.                      The phrase “minimises its visual impact on the neighbouring countryside” is ambiguous. HSRA suggests this policy wording be amended to read: “has no adverse impact on the neighbouring countryside”.                      Note that otherwise boundaries onto the South Downs National Park or AONB will be affected.</p>	<p>There are exceptions in National and Local Planning rules that permit development in Green Belt, AONB and Countryside beyond the Green Belt. The NP must be in conformity with these “higher” planning rules in order to meet the Basic Conditions. It is not possible to refuse planning applications on greenfield land on the basis there are some brownfield sites that remain undeveloped. H2 has been combined into H1.2. reference to “minimising its visual impact on the neighbouring countryside” has been removed since other National and Local Planning rules will require this.</p>	
<p><b>Haslemere South Residents’ Association</b>  <b>H 3 – Context</b>                      The Context and reasoned justification for policy H3 sets a tone of inevitability that new developments will happen on AONB or outside the Settlement Boundary. For this reason, HSRA is against the rationale given for this policy (consistent with its position on policy H1.3). It is entirely inconsistent with National planning policy guidance, and not helpful or justified when the Plan’s premise and Intent is that no new developments occur in greenfield spaces outside the Settlement Boundary. The first sentence of the second paragraph of the Context significantly omits the fact that c.90% of the community does not believe large developments should happen outside the Settlement Boundary.</p>	<p>There are exceptions in National and Local Planning rules that permit development in Green Belt, AONB and Countryside beyond the Green Belt. The NP must be in conformity with these “higher” planning rules in order to meet the Basic Conditions. It is not possible to refuse planning applications on greenfield land on the basis that there are some brownfield sites that remain undeveloped.</p> <p>The Haslemere Vision Phase II housing consultation results show that 65% of respondents stated “build as many homes as possible within settlements”, 24% supported</p>	

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	<p>“several small scale greenfield developments”, 8% supported “a few large greenfield developments” and 2% did not select an option.</p>	
<p><b>Haslemere South Residents’ Association</b> <b>H3</b></p> <p>To the extent that this policy seeks to promote high quality sustainable building standards, these may be best left to statutory regulations. However, if it has a place in the Neighbourhood Plan, the standards should distinguish between subject-matter which is of relevance to the whole Plan area (e.g. visual impact) and subject-matter which is of relevance to specific circumstances (e.g. preserving ecological value). These standards must not be prepared on a premise of accepting large development outside the Settlement Boundary or on areas of AONB/AGLV.</p> <p>To the extent that developments occur as envisaged under policy H2, it may be appropriate to recommend some of the standards although blanket application of costly BHQM 4 standards would be inappropriate.</p> <p>It is bizarre that the policy starts with “All new development [on AONB]...” when the Plan’s Intent is that there be no new development (excluding the limited brownfield and micro-developments envisaged by policy H2)! Surely, if this policy is to be retained, it should start with “Any rare and exceptional new development that is permitted under the Plan’s other policies [on AONB]...” It is likely that Sturt Farm is the only large development site that falls to be governed by this policy as currently drafted, being inside the Settlement Boundary.</p> <p>Without limiting the significance of the comments above, please note that in the detail, H3.ii.f is incompatible with the Intent of the Plan to protect and enhance the existing protected landscape and environment within and surrounding Haslemere. It should be deleted. In any event, please note that the word “acceptable” is imprecise and allows, if not anticipates, the destruction of AONB to meet other unstated goals (e.g. a housing number quota – see comments above). The policy must be consistent with the default being that development will not take place where it causes loss of priority habitats. It is suggested that if the policy is retained it also must contain reference to a Section 106 agreement or similar that stipulates what is required of developers undertaking such development and the penalties if they don’t carry it out within a certain timeframe. The way it is currently worded in the draft Plan asks the community to accept damage to AONB where there is clearly no need; there must be no risk of misinterpretation that meeting biodiversity requirements necessarily makes development acceptable.</p> <p>As a general comment, H3.ii should be more precise as regards obligations on a proposer of development, rather than using vague expressions such as “designed to contribute” or “may include”. The second paragraph of this policy should be deleted as inconsistent with the policy set out at H3.ii which clearly identifies the need to protect the “ecology and habitat in which the property is built”. If not deleted, the paragraph should be amended to exclude the possibility of accepting any external offsetting arrangements to calculate net biodiversity gain. It is not right that a proposal includes offsetting that occurs outside the Neighbourhood Plan area.</p> <p>The same policy included in policy H13.1 should be inserted in policy H3, namely, “Proposals that protect, enhance and sustain these [AONB/AGLV] in a way which is consistent with its significance to the local community will be supported.”</p>	<p>There are exceptions in National and Local Planning rules that permit development in Green Belt, AONB and Countryside beyond the Green Belt. H3 seeks to ensure that should development occur in these areas it meets high standards of sustainability.</p> <p>The requirement to meet the Homes Quality Mark 4 star rating has been removed.</p> <p>The policy wording has been altered to state that it only relates to proposals that meet the exceptions within planning policy relating to building on designated land and to take account of the comments relating to H3ii.</p> <p>Regarding H3iif. this has been retained. It was supported by Surrey Wildlife Trust who proposed enhancements to the wording.</p> <p>It was not the intention for the policy to allow external offsetting of biodiversity gain outside the NP area. The paragraph referred to has been removed.</p>	<p>Policy wording amended</p>

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<p><b>Haslemere South Residents’ Association</b>  <b>H 4</b>                      The threshold for a material development throughout the Plan should be set at 10 dwellings. This threshold is accepted as such in policies H1.5, H7.2, H9, H10.1 and H10.2 (as well as WBC’s LPP1 Policy AHN1 which categorises developments of over 11 dwellings as “suburban”) and should be consistently applied. In the context of this policy on consultation, any project of 10 or more dwellings in Haslemere will have a significant ecological and infrastructure impact and therefore must include requirements for consultation. To remove the need for community consultation is failure of local democracy and it is noted from H4 – Context that the Waverley best practice for engagement is for developments of at least 10 dwellings and there is no reason why the policy H4 should not be pitched accordingly. No development of 10 or more dwellings in the Plan area should be considered in isolation and without consultation, especially where the impact could lead to urbanisation and coalescence that would irrevocably alter the town’s rural character and setting.                      The developers should be required to set out how a development meets the requirements of the Haslemere Design Statement (per policy H7.1) as well as the usual material planning considerations. It is vital to ensure that the acceptability of proposed developments does not start with a minimum number.                      Planning applications should not be approved unless details are confirmed with respect to design and materials, rather than leaving these aspects to post-approval with potential for deterioration in quality and impact on the visual amenity of any development.                      Transparency of the planning application process is important and HSRA recommends that the consultation policy include provision that all correspondence and record of meetings between an applicant and the planning authorities be included in publicly available consultation documents and planning application documents.                      If the burden of consultation costs is a factor in determining the policy threshold for this policy H4, some proportionality could be applied for developments between 10-49 dwellings, but requiring specified key features of the proposals being subject to consultation.</p>	<p>Consultation responses indicated support for a lower threshold for this policy than 50 dwellings. The policy has been altered to apply to developments of 10+ dwellings.</p>	<p>Policy wording amended</p>
<p><b>Haslemere South Residents’ Association</b>  <b>H 6.1</b>                      Consistent with our comments at policy H4, HSRA believes that the threshold in the third part of this policy should be set at new developments of 10 or more dwellings, rather than 50. Given the size of the town, its topography and rural streets and lanes, the management of traffic and pedestrians is critical for any development of 10 or more dwellings.</p>	<p>The policy is now H9.2 A threshold of 10 is now used.</p>	<p>Policy wording amended</p>
<p><b>Haslemere South Residents’ Association</b>  <b>H6.4</b>                      This policy should better reflect the same context and reasoned justification for policy H11 with respect to ensuring various aspects of the environment are protected. Therefore, the wording of this policy needs strengthening to require that no mature and amenity trees should be forfeited and that AONB should not be destroyed to achieve a vehicular access point. Otherwise, this policy may operate as an incentive to fell veteran trees in anticipation of future work with an underlying objective to reduce pre-development ecological land value.</p>	<p>This policy is now H9.3. Policy H11 would also apply in the circumstances mentioned so there is no need to repeat the requirements in this policy.</p>	

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<p><b>Haslemere South Residents’ Association</b>  <b>H11 - Context</b>                      Given the importance, as noted in relation to policy H7 and this policy, it is strongly recommended that additional policy provisions are included which extend the protection of trees across the Plan area for both their ecological attributes and their contribution to the visual and rural environment of the town.</p> <p><b>H11.1</b>                      This policy is an example of the draft Plan lacking conviction and being misaligned with its stated Objectives and Intent. The policy wording is undermining in the sense that the expression, "...will not normally be permitted" gives the impression of opening the door to undesirable development. The phrase points to an ill-defined level of discretion. The policy should rather say, "...will not be compliant with the Plan".</p> <p>When a site is allocated, the Plan should reference and reinforce the responsibility for WBC to observe standard council practice and impose protecting blanket TPOs. When sites are proposed for allocation to development, they should automatically have a restriction on this destructive ‘culling’ of mature trees, hedgerows and meadows, which are vital habitats, pending planning permission being granted. This would mean that the last sentence of this policy (which adopts an approach of ‘asking for forgiveness rather than permission’) should be modified. Intentional damage which is not sanctioned by planning permissions, must be punished. Damage prior to development must not be contemplated within the Plan unless permissions are in place and obtaining permission from WBC should be a requirement under this policy.</p> <p><b>H 11.4</b>                      This policy risks being misaligned with the Plan’s stated Objectives, Principles and Intent. Developers will take this policy and assume that they can pay to build a ‘positive’ biodiverse environment adjacent to their proposed development by presenting a subjective calculation of what is deemed positive net impact. Damage to the existing mature ecology for the sake of development cannot be replaced by new green spaces. Mature biodiverse habitats take generations to develop and cannot be replaced by some bird and bat boxes and planting of saplings. This policy relies upon terms such as “Positive net impact” which is not defined and therefore not enforceable. In this context, however, as indicated above, offsetting outside the property should not be permitted as an acceptable form of mitigation.</p> <p>It is suggested that an additional policy statement be included: “Proposals for development which do not damage or adversely affect existing ecology or habitats, as well as those which enhance, protect and sustain existing ecology and habitats, will be supported, provided they are in conformity with other policies of the Plan.”</p>	<p>We have been advised that inflexible policies will be struck out.</p> <p>The NP has no power to direct WBC as to its policy on TPOs. HV/HTC met with Waverley Tree and Landscape Office to discuss WBC’s policy on this issue. WBC’s current position is that a blanket imposition of TPOs at the point where a site is allocated would simply encourage felling before that point, which the policy would be powerless to prevent.</p> <p>Meanwhile, a proposal for a survey to identify and trees and hedgerows of local intrinsic value (landscape, biodiversity, cultural, historic) has been put forward under Opportunity 19. This could help identify ‘sensitive zones’ that may justify special protection and support a more proactive/targeted basis for TPO applications. Given the requirements elsewhere within the NP for minimum densities in order to allow WBC to meet the government-imposed requirements without encroaching on AONB etc land, it was not considered practicable to always require replacement planting on the development site itself.</p> <p>Elements covered under H11.4 are now picked up under Policy H14. This has been considerably revised and strengthened including a requirement for developers to demonstrate post-development achievement of a minimum 20 percent increase in biodiversity net gain as part of their planning application. Requirements for replacement planting have been expanded to require equivalent value, not just 1 for 1 planting.</p>	<p>Policy H11 has been enhanced to include additional policy provisions and to clarify the other benefits of trees and hedgerows that the policy seeks to retain.</p> <p>Policy H11 wording amended to strengthen the presumption against such development. The requirements for replacement planting have been expanded and strengthened. Policy wording amended</p>
<p><b>Haslemere South Residents’ Association</b>  <b>H12</b>                      Any development of multiple dwellings (over 10) will inevitably adversely impact the dark skies. In many parts of Haslemere, including south Haslemere where members of HSRA reside, have an unrestricted Dark Sky over the South Downs National Park, certified in May 2016 as one of the few International Dark Sky Reserves. Lighting is not about LED or light type as ground light damages the dark skies as much as horizontal or vertical mounted lighting.</p>	<p>ILP Guidance Note 1 for the reduction of obtrusive light 2020 refers to the different effect of light from the blue end of the spectrum. Guidance Note 8, Bats and artificial lighting in the UK, refers both to the impact of light spectrum and other lighting issues on bats. This Guidance is referenced in the Context and Reasoned Justification section of the policy.</p>	

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<p>Separately, there is an impact from quality of lighting for wildlife - the colour temperature (how 'white' a light is) is critical. Given that wildlife is negatively impacted by white light (halogen &amp; LED), it is recommended that the policy at H 12.iii is extended so as to avoid this as well.</p> <p>In a similar fashion to the last sentence of policy H 11.1, the last sentence of this policy invites an approach of 'asking for forgiveness rather than permission' and therefore should be modified. Failing to respect the Dark Sky requirements certainly should be punished and mitigated, but that should be set out in the enforcement section of the Plan (Delivering and Monitoring) rather than anticipating a developer can delay mitigation until post-development. Unacceptable lighting under this policy must simply not be contemplated within the Plan.</p>	<p>The reference to post-development mitigation is not intended here to cover failure of developers to comply with the terms of the permission (the normal process would apply here) but situations where later or ongoing work will be needed should the measures agreed be insufficient to meet the required standards.</p>	
<p><b>Haslemere South Residents' Association</b> H13 – Context</p> <p>In noting the equivalence of protection for Local Green Space to Green Belts, under the NPPF (last sentence of the Context), the levels of protection intended for the Local Green Spaces, on the one hand, and those intended for AONB/AGLV in the Plan area, on the other hand, must be the same. This is not the case under the current draft Plan, where policies within H1 are not as clear as those in H13.</p>	<p>Both H1 and H13 have been reviewed and changes made to the policy wording to reflect these concerns and clarify protection proposed.</p>	<p>Policy wording amended with clarification of protection proposed.</p>
<p>In particular, the expectation that development will be refused in Local Green Spaces, such as the Town Meadow, under policy H13 (noting the Delivering and Monitoring measures) is not the same level of expectation with respect to AONB/AGLV, under policy H1 (and its related Delivering and Monitoring measures). There is no justification for this distinction either within the logic of the draft Plan's Objectives and Intent or within the requirements of the NPPF.</p>	<p>Policy wording for H1 and H13 has been amended to clarify protection proposed.</p>	<p>Policy wording amended</p>
<p><b>Haslemere South Residents' Association</b> H13 - Intent</p> <p>The clear wording of intent, "This policy seeks to give added protection against development to locally valued green areas or open spaces within and around the town." is stronger than the wording of intent for policy H1. Again, there is no justification for this distinction and this wording should be mirrored in the intent for policy H18.</p> <p>HTC should take the opportunity to designate all the identified Green Fingers as Local Green Spaces within its actions under Opportunity 3 in the Plan document, but accelerate such designation to be part of the finalised Plan now. The protection under the policy appears identical. The fact that the Local Green Spaces have been carried over from the previous exercise of designation within the Haslemere Design Statement does not prevent the addition of the Green Fingers to the same nationally/NPPF-recognised designation. This would also avoid confusion or attempts at differentiation between the two.</p>	<p>The original list of LGS sites was based on WBC's assessment of Haslemere's candidate sites in WBC's Local Green Space Topic Paper (2018) which identified 6 sites for LGS designation. In the light of these latest comments, the full list of sites has been re-assessed against LGS criteria as set out in NPPF para 77. As a consequence, a number of sites have been re-classified. Full details are contained in the supporting paper 'Local Greens Spaces and Green Fingers Assessment' provided in the evidence base.</p> <p>The policy wording has also been reviewed in consultation with an independent Planning Consultant to clarify the distinction between the LGS and Green finger designations and the respective levels of protection proposed in this NP.</p>	<p>The full list of sites has been re-assessed which has led to re-classification of some sites.</p> <p>Policy wording amended to clarify differences between levels of protection for LGS and Green Finger designations</p>

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<p><b>Haslemere South Residents’ Association</b> H 13.1 There seems to be a continued lack of conviction and clarity in the draft Plan even on this policy and policy H 13.2. Rather than contemplating development, it would be preferable to set policy that simply prohibits development in these green spaces. It is not good to refer to “special circumstances” that are not defined or limited. If there is to be such a qualification, it would be far better to specify expressly that the “special circumstances protect, enhance and sustain the relevant green space and its community raison d’être”. This way, it would be clear that adding a pavilion to a green space sports field could be an acceptable special circumstance but building a private house in the corner of a green space would not. H 13.2 OK, with material reservations Please see comments above regarding policy H13.1 which apply equally to policy H13.2.</p>	<p>Policies for managing development within a Local Green Space should be consistent with those for Green Belts (NNPF para 101). Appropriate forms of development which have policy support in the Green Belt are set out in NPPF Para 145. There is no definitive list for what will constitute ‘very special circumstances’ for LGS-designated sites. Proposals should be assessed on a case by case basis with consideration given to the need to protect, enhance and sustain its value to the community. The addition of a pavilion or equipment storage area for a sports field are good examples of situations where the proposed development would increase the public amenity value of the site and constitute an acceptable special circumstance. Policy wording for both H13.1 and H13.2 has been revised following discussion with an independent planning consultant employed to perform a Health Check on the NP to clarify levels of protection proposed.</p>	<p>Policy wording for H13.1 and H13.2 has been amended to clarify differences in levels of protection proposed.</p>
<p><b>Haslemere South Residents’ Association</b> H 14 – Intent It is noted that Opportunity 18 within the Plan document includes a closer mapping and identification of the wildlife corridors and stepping-stones. To the extent that this policy will be dependent on that future mapping, it should reference and be subject to it.</p>	<p>Comment noted. The biodiversity mapping work proposed in Opportunity 18 was completed in October 2020. The Context and Reasoned Justification section of the policy references this study with full details provided in the supporting paper ‘A Biodiversity Audit of Haslemere’s Ecological Network’ in the evidence base.</p>	<p>Policy H14 has been extensively revised in the wake of the biodiversity mapping project and discussions with Surrey Wildlife Trust, Natural England and other ecology experts</p>
<p><b>Haslemere South Residents’ Association</b> H14.1 Similarly to other policies’ wording, it is important that there is not an unintended expectation of development in having policies that anticipate mitigation for damage rather than ensuring and enforcing the fullest levels of protection that the community intends. The Plan should not establish an assumption that these protected areas may be built on if developers are simply able to provide adequate actions and mitigation measures. The policy must first and foremost require no harm. To the extent that risk may exist, and mitigation is required under this policy, it should be that, “Proposals...must demonstrate how, on what timeline and with what evidenced degree of confidence, this risk will be fully mitigated.” The policy refers to the Wealden Heath Phase II SPA, but does not refer to the buffer zones (5km) which are protected zones under European Law9. This should be added to the figures in the Plan and included in the relevant protected zones. Policies H14.1 and H14.2 are duplicative and should be reduced to a single policy.</p>	<p>See comments above. Policy H14 has been expanded and strengthened following completion of the biodiversity mapping work and discussions with ecology experts including Surrey Wildlife Trust and Natural England. The latest wording reflects a more holistic approach to considering Haslemere’s ecological network with individual components (including all designated wildlife sites such as the Wealden Heath Phase II SPA) explicitly described in both the policy wording (H14.1) and associated maps.</p>	<p>Policy H14 has been extensively revised in the wake of the biodiversity mapping project and discussions with Surrey Wildlife Trust, Natural England and other ecology experts</p>

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<p><b>Haslemere South Residents’ Association</b> H 14.2</p> <p>In order to be consistent with the Intent, this policy must provide that relevant proposals “shall be refused...” rather than merely “will be resisted...”; otherwise the Plan lacks conviction and clarity as to these protections.</p> <p>In relation to net biodiversity metrics and the referenced DEFRA Metric and Impact Calculator, no external offsetting outside the Plan area or ideally the property should be permitted in the calculation – otherwise, elimination of a wildlife asset in Haslemere could be replaced by one in Scotland! This is the same point as commented above in relation to policies H3 and H11.4.</p> <p>In any event, as commented above, policies H14.1 and H14.2 are duplicative and should be reduced to a single policy.</p>	<p>See comments above. We believe that the revised policy wording addresses this points. In particular, wording in the new H14.4 proposes that any off-site biodiversity off-setting need will give priority to off-setting schemes within the two Biodiversity Opportunity Areas within which Haslemere sits.</p>	<p>Policy H14 has been extensively revised in the wake of the biodiversity mapping project and discussions with Surrey Wildlife Trust, Natural England and other ecology experts</p>
<p><b>Haslemere South Residents’ Association</b> H 14.3</p> <p>Even though this policy applies to development outside a specific corridor or stepping-stone, it is important to include protection for the bordering areas where development may create risk. To this extent, the policy is OK. However, any mitigation of that risk needs to be both realisable and complete. Therefore, the wording should read, “New developments bordering...must demonstrate how, on what timeline and with what evidenced degree of confidence, they will fully mitigate any significant harm...”</p>	<p>We agree with the need to protect border areas and believe that the revised policy wording in H14.2 and H14.3 addresses this concern. Additionally, the policy now includes a requirement for developers to demonstrate the post-development achievement of a minimum biodiversity net gain of 20 percent as part of their planning applications. Proposals that negatively affect or fragment the ecological network will not be permitted.</p>	<p>Policy H14 has been extensively revised in the wake of the biodiversity mapping project and discussions with Surrey Wildlife Trust, Natural England and other ecology experts</p>
<p><b>Haslemere South Residents’ Association</b> H15</p> <p>The Context includes reference to “five major sites” identified by WBC for housing development. These sites should be specified and the WBC identification document referenced (presumably not an earlier draft LLP2 which has been withdrawn by WBC pending its ongoing review).</p> <p>The Context is silent as to the spatial density of employment. In balancing different factors and trade-offs between the Plan’s Objectives, it will be important to identify the relative benefits in spatial terms as well as absolute figures. By way of illustration, is the desired outcome different if a site of 1.8 hectares (that could provide up to 135 dwellings at 75 dph) is protected for the employment of 10 employees (5.5 eph 12) versus 100 employees (55.5 eph)? It would be beneficial for the Plan to provide guidance or policy on the relevance of employment density when balancing priorities for housing density within the Settlement Boundary.</p>	<p>Footnote added to identify the sites.</p> <p>Analysis of the benefits in spatial terms would be useful but unfortunately it is too late in the Plan process for this work to commence. Consultation results indicate the community’s acceptance of lower densities in some places (Fairground, Key site- West Street) in order to include mixed use developments.</p>	<p>Context wording altered.</p>
<p><b>Haslemere South Residents’ Association</b> H 18.2</p> <p>Note that this policy must be expressly subject to all other policies, given its reference to potential development outside the Settlement Boundary.</p>	<p>All policies in the plan must be applied to a planning application.</p>	

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<p><b>Haslemere South Residents’ Association</b>  <b>Flexibility</b>                      It is not clear that this section is intended to be part of the formal Neighbourhood Plan or merely extraneous commentary. In either case, it is critically important that there be no change in Settlement Boundary or policy provision as a result of the exchanges described in this section. Full public consultation will be necessary for any such changes or reviews of the Plan. It is also the case that the concept of WBC and/or HTC acting as “brokers” between developers and the community seems open to processes that would fall outside due planning processes and should therefore not be anticipated in this way.</p>	<p>Under current planning regulations, changes to the settlement boundary or policies would require consultation.                      WBC owns the Fairground, Youth Campus and some of the Key site in West Street. Should WBC wish to consult with the community on plans for development on those sites, it would be welcomed. Achieving the housing numbers will be dependent on the outcomes for these sites. HTC and community organisations such as Haslemere Vision and the Haslemere Community Land Trust are keen to assist with this.</p>	
<p><b>Haslemere South Residents’ Association</b>  <b>Survey results analysis and interpretation</b>                      HSRA notes a number of key survey questions were worded ambiguously so a simple single answer (Yes or No) could be interpreted as support for more large-scale development on AONB and AGLV land which a respondent might not actually support. There is a common theme through several questions, hinting or leading with a presumption that AONB &amp; AGLV is a likely or suitable building area, provided, for example, mitigation of biodiversity damage is demonstrated.                      There is a concern that a respondent would simply click “Yes” or “OK” without realising the implications of caveats within the policy detail which might allow loopholes for construction that was not intended or desired by the respondent on protected greenfield landscapes. For example, where the wording of a policy includes an imprecise or non-defined statement, such as, “Development should not normally be permitted on AONB or AGLV sites”, respondents will vary in understanding as to whether “not normally” means “virtually never” or “not always, but quite easily”. But for the purposes of data analysis, this imprecision can lead to a challenge in interpreting binary answers, ‘Yes’ or ‘No’. This may, in turn, lead to a false positive response which would undermine the survey’s results. In this situation, it is important to continue to reference and respect the expressed majority community wishes from previous Haslemere Vision consultations.                      As will be appreciated, this phenomenon leads both to a dilemma for the respondent as well as carrying serious implications for how the results are interpreted.                      The wording of policy H3 is a dangerous example where respondents who are given the option of sustainable building practices may decide they should click ‘Yes’ or ‘OK’ without appreciating that as drafted H3 opens the door to a conclusion that it is acceptable to build on AONB/AGLV simply if the buildings respect these criteria. Other policies appear to be drafted on the premise that protected greenfield land will be built on, when this is by no means the intent or a given.                      There are certain HSRA members who have expressed perplexity and raised doubts about their trust in the consultation process as a result, fearing the Plan is “diluted” and “seems like a developer’s charter” as currently drafted, which will not have been the intent of the preparers. The Locality Neighbourhood Planning Roadmap says, “Effective community engagement and a robust evidence base are the foundations on which an effective neighbourhood plan will be built.” It is critical for the robustness of Haslemere’s final Neighbourhood Plan and its future important role in decisions being made in accordance with the wishes of the community that the precise wording of the Plan is very carefully reviewed with these observations in mind.</p>	<p>The survey comprised each of the policy statements with the question: Do you support this policy?                      Respondents could select:                      Yes, I support the policy fully                      It is OK but I have some reservations                      No I do not support this policy.</p> <p>Regardless of the option selected respondents could add their comments on the policy in a textbox.                      Large volumes of comments were received for the policies about the settlement boundary and building on designated land:                      H1.1 – 109 comments                      H1.2 – 89 comments                      H1.3 - 183 comments                      H3 – 139 comments</p> <p>During analysis of the Regulation 14 consultation responses substantial weight has been given to the comments received as demonstrated in this Consultation Statement.</p>	



## Appendix 11 e - Haslemere Neighbourhood Plan – Regulation 14 Consultation Representations, Response and Suggested Action

Representations, comments and issues raised – Consultee letters/Survey and webinar additional comments	Response	Suggested actions
It goes without saying that against this background it is all the more important for the next following steps in finalisation of the draft Neighbourhood Plan up to and including the referendum be taken in with total public transparency; this would include transparency as to how the consultation inputs are analysed and taken into account.		
<b>Monkhill Ltd</b>		
H1.1 Settlement boundary is very tightly drawn and does not allow for any extensions proposed within the Local Plan (Part 2) Consultations. Given that the NP is leaving allocation of sites to the Local Plan (Part 2) it would also seem sensible to leave the designation of a settlement Boundary to that Plan to prevent conflicts occurring between the two Plans.	The emerging Local Plan part 2 defines settlement boundaries for the NP area, as the NP will possibly be adopted before the Local Plan it is necessary to define the settlement boundaries in the NP so that the areas the policies apply to can be identified.	
H1.2 Presumption against the development of land that lies outside the settlement boundaries, combined with H1.1 make it impossible to meet the housing requirements. Thus, responsibility for the allocation of further development sites is abrogated to the Local Plan process.	The settlement boundary and windfall evidence paper sets out how the housing allocation can be met.	
H1.3 This recognises the need for sites to be brought forward under the local plan process, but then suggests that these ‘allocated’ sites could only be developed if sites within the settlement boundary/windfall are not delivering at the required rate, this is clearly inconsistent with a Local Plan allocation. It also fails the Basic Conditions (condition – e) in that it is not in general conformity with the strategic policies in the Local Plan Part 1. Table 1 – This shows “Housing Numbers Threshold Achieved” but includes future dates up to 2032, with no evidence as to how these numbers can ever be met. <b>Note: As such this table can be regarded as seriously misleading.</b>	There were numerous consultation comments about this policy after appraising them all it was decided to remove the policy.	Policy removed
H1.5 This sets density aspirations which are inconsistent with numerous other policies and aspirations (H7.1, H7.2). This approach is inflexible and does not allow for the correct approach to be taken, i.e. that density is a product of the right design for any given site having regarding to site constraints and other Development Management requirements.	Some flexibility has been added to the density policy	Policy amended
H2 This seeks to restrict development in a way which is not necessarily consistent with NPPF policy guidance for the relevant land designation and is not in general conformity with the Local Plan part 1.	H2 now included in H1.2 and refers to exceptions in NPPF and LP policy	Policy amended
H3 This policy seeks to add an additional burden and impediment to the development of sites which (following the broader requirements of the plan) will only be delivered if essential to meet housing need.	Due to the lower land values for greenfield sites meeting these requirements will not render development unviable.	
H4 The requirement for the developer to prepare a “Development Brief” is un-necessary and goes beyond the normal requirements of the NPPF. In doing so it is contrary to Basic Requirements a, d and e.	The NPPF recognises the importance of effective engagement, it states that applicants should engage closely with those affected by their proposals to evolve designs that take account of the views of the community.	
H5 The reasoning fails to demonstrate how it can be assumed that delivery of windfall sites can or will be maintained at current levels. This is a matter for WBC via the strategic policies established within the Local Plan (part 1) and thus fails Basic Conditions a and e.	The settlement boundary and windfall evidence paper sets the windfall evidence for Haslemere.	Wording added to context and reasoned justification
H7.2 The requirement for additional green space is inconsistent with policy H1.5 as it would make the relevant density requirement un-achievable.	Policy changed to require additional green space where the Accessible Green Space Standards are not already met.	Policy amended
H9 The requirement to “safeguard a proportion of the affordable homes from future sale and maintain affordability of the homes in perpetuity” is inconsistent with current National Policy and is not a requirement of the Local Plan, it therefore fails Basic Conditions a and e.	The NPPF states that the type of affordable housing required should be specified in planning policies.	

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<p><b>Monkhill Ltd</b> H10.2 – This constitutes a barrier to the achievement of windfall housing provision by artificially limiting development options.</p>	<p>Development options are directed towards local needs which are generally more smaller homes.</p>	
<p>H11 General conflict with the density requirements of Policy H1.5</p>	<p>Density policy has flexibility within it.</p>	
<p>H13.2 The additional protection given to these areas serves to prevent development on areas which are otherwise more sustainable and preferable in landscape terms to other sites which may otherwise need to be allocated (possibly outside the Settlement Boundary) to meet housing need.</p>	<p>Policy H14 has been enhanced to include details of Haslemere’s Ecological Network. These site form an essential part of that network.</p>	
<p>H17.1 This may be inconsistent with NPPF requirement.</p>	<p>H17.1 has been removed.</p>	
<p><b>Resident</b> <b>H6</b> This policy needs to be expanded to consider the effect of traffic generated by new development, whether from housing, business or recreational development. Increasing traffic continues to concern residents in Haslemere. Traffic generation is covered by the NPPF and Highways Authorities and must follow the Framework guidelines when, as statutory consultees, planning authorities are advised on individual planning applications. At this stage, it would seem Surrey CC’s Highways role needs to be acknowledged and involved. Their primary role ensures new development does not cause severe transport problems, including those relating to road safety. Their advice is recognized by Planning Inspectors and Planning Authorities. Inspectors have refused planning applications when environmental or amenity problems are detrimental for residents. These safety, environmental and amenity features are relevant to all new development, inside or outside the settlement boundary. The greater distance new houses are built from the centres the greater the use of vehicles to reach them. Pressure becomes severe on central parking spaces and the levels of pollution become higher from increased congestion. Regular journeys to other amenities, including schools, would be easier to organize with innovative and more environmentally-friendly public transport from developments in or close to the central areas. An in-depth consideration or traffic generation issues would help to support the main direction of the Plan and improve the policy conclusions.</p>	<p>H6 renumbered to H9</p> <p>H9.2 Requirements for travel plans to project the impact of motorized traffic now specifically included for sites of 10+ dwellings. H1.1 requires development to be concentrated within settlement boundaries and H2 requires greater density of homes within 1km of the Railway Station (central point for the town) to minimize the distance of new homes from central areas and amenities.</p> <p>Further references to traffic flows and Station travel plan studies included within the Evidence based.</p>	
<p>Resident <b>H11</b> The issue on Tree cutting has been witnessed at Red Court already and the Forestry Commission and Waverley have both visited. There is a systematic ploy to reduce the AONB value prior to any planning so I would like to see a protection clause of trees. Why is a blanket TPO not applied to all the allocated sites immediately they are allocated?</p>	<p>The Red Court site has not been allocated. Policy H11.6 has been enhanced to include provisions when trees are accidentally or intentionally damaged. H11.4 requires that development proposals should demonstrate that they have been informed by a full site survey conducted by a qualified arboriculturalist or ecologist, and include a management plan.</p>	<p>Policy H11 enhanced.</p>

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<p>Resident H14</p> <p>There is an implication with the reference to wildlife corridors that development could be permitted in areas of ANOB &amp; AGLV necessitating the need for wild life corridors. As I am passionate about respecting and preserving the local wife life, development in these areas should be prevented thus there would be no need for wild life corridors.</p>	<p>The primary statutory purpose of the AONB designation is to conserve and enhance the natural beauty of the landscape. This includes geology, climate, soil, plants, animals, communities, archaeology, buildings, the people who live in it, past and present, and the perceptions of those who visit it. The recent Glover review (2020) proposes that National landscapes (including AONBs) should have a renewed mission to recover and enhance nature. A special project identified under Opportunity 18 of the NP has recently mapped Haslemere’s entire ecological network and underpins a revised Policy H14 which has been expanded and strengthened to address nature recovery and enhancement of this ecological network in both AONB/AGLV and non-AONB/AGLV designated areas.</p>	<p>Policy H14 has been extensively revised in the wake of the biodiversity mapping project and discussions with Surrey Wildlife Trust, Natural England and other ecology experts</p> <p>It has also been re-titled ‘Protecting and enhancing biodiversity through Haslemere’s ecological network’.</p>
<p>Resident H6</p> <p>Figure 3 in Section H6 shows a proposed cycle way, and presumably footpath, to the Devil's Punchbowl.</p> <p>Having gone through the car park behind the old Crown and Cushion the proposed way diverts to the right, through the woods, etc. to eventually come out further up Bunch Lane.</p> <p>As shown, it appears to go through our garden and those of our neighbours' houses,.....</p> <p>You might find it considerably cheaper to alter your route to go up the footpath/recently upgraded cycleway/ drive to Bunchwood from the Crown and Cushion carpark direct to Bunch Lane. Bunch Lane is already much used and enjoyed by cyclists and walkers and would seem to be entirely suitable for your purposes</p>	<p>H6 renumbered as H9</p> <p>H9.6 Better resolution maps included to make route clearer and ensure that route map remains within Church land (previously consulted and permission obtained) and does not stray over the boundary lines of neighbouring properties.</p>	
<p>Resident H6</p> <p>Whilst it is commendable that Neighbourhood Plan considers new footpaths and cycle routes together with improving access to public transport, the fact remains that personal car use is increasing year on year and there is little, if any, evidence to suggest that car use will decline over the period being considered by the Neighbourhood Plan, <u>particularly in rural areas</u>. Realistically, as more dwellings are built in Haslemere and the surrounding villages, so road traffic will increase, be it from commuters travelling to/from the station or to/from places of work within Haslemere/Weyhill as well as people accessing the amenities in Haslemere and Weyhill.</p> <p>However, despite the above situation, Neighbourhood Plan does NOT consider future car parking demands and present a detailed plan as to how this situation will be accommodated.</p>	<p>H6 renumbered as H9</p> <p>Policy H9.5 supports additional off-street parking for shoppers and residents. Car parking opportunities included within Section 5.</p>	<p>Policy wording amended</p>

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<p>Resident H6 <i>'62% of respondents supported a suggested pedestrian link between the High Street and Wey Hill'.</i> Yes, we need to walk more, but there is already an existing path between Weyhill and the old Town. You have to cross the road at the rail station and it is then difficult to reach the shops at the end of Lower Street without running the gauntlet to cross back again, so this section could be improved. However, I am a fairly fit person in my mid 50's and I am happy to walk from Weyhill to the Old Town, but I wouldn't want to carry more than one medium bag of shopping back home between these sites; consequently, I really don't believe that many people would take advantage of an improved path for the purposes of shopping between the two sites. It would be an expensive undertaking with no significant benefit to the people of Haslemere.</p>	<p>Comments noted.</p>	
<p>Resident H13 Having read the plan I'd like to fully support policy <b>H13</b> (Local Spaces) and the need to maintain green spaces for not just the look and feel of the town but also as areas for people to enjoy and walk in etc.  As a resident of Buffbeards Lane, I'm obviously keen for Item 12 to pass about the woodland between Buffbeards and Vicarage Lane to remain in place, as it's an important path for the children and elderly on the road over having to risk crossing the Hindhead Rd on a blind corner.</p>	<p>Your support is much appreciated! The woodland between Buffbeards Lane and Vicarage Lane, south of Holy Cross Hospital is a candidate site for 'green finger' designation in the NP. Your comments regarding the community value of this area in terms of road safety are also useful.</p>	<p>Additional info on the community value of this site has been incorporated into LGS and Green Finger Assessment paper.</p>
<p>Resident H13 We wish to thank you for including the area between our Lane and Vicarage Lane under Table 6 - Green Fingers item 12, under Policy <b>H13</b> Local Green Spaces (within the settlement boundaries) on page 40, which you recognise as an important "green lung" which contributes to the character of the landscape and townscape. We would add that it is also a refuge for deer, badgers, foxes and other wildlife as well as containing many established trees, supporting a variety of birds. This is an area which matches the need for protection of such "Green Fingers" in Shottermill/Critchmere, to that so strongly and correctly included for Haslemere Town.  The second and final point we make is that Sturt Farm is also such an area, providing green relief to urban development at this end of town. We do appreciate that some of this land has already been approved for development. Surely the rest of this area should be given the same level of protection in your report under Policy <b>H 13.2</b> to the benefit of the town - including the eventual residents of the dwellings which will be allowed to be built under the finally agreed planning consent(s). Otherwise the danger is that the remaining land which will still give considerable "green" relief, will be taken quickly by developers and lost to the local community forever</p>	<p>Your support for the policy is much appreciated and your comments regarding the community value of both the woodland between Buffbeards Lane and Vicarage Lane and the Sturt Farm area (excluding the permitted development area) have been included in our 'Local Green Spaces and Green Fingers Assessment' Paper. This forms part of the NP evidence base and underpins the case for including these two sites as candidates for designation as 'green fingers'.</p>	<p>Additional info on the community value of these sites has been incorporated into LGS and Green Finger Assessment paper.</p>

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<p>Resident H6 Agree but the policy could be hard to meet so should not be used to block otherwise meaningful and positive development. Meeting the housing requirement should be the primary objective.</p> <p>Resident H15 Agree but policy needs to allow agile decision making for meaningful and positive development, not block development in each case with blanket enforced timescales.</p>	<p>Noted The length of time for marketing is only a suggestion to demonstrate what may be considered appropriate. Circumstances will be considered when planning applications are made.</p>	
<p>Resident H16 Better provision for affordable public transport.</p>	<p>This is not something planning policy can address but Opportunity 16 relates to improving public transport.</p>	
<p>Resident H6.1 'Sufficient' off-street parking cannot in itself reduce the impact of on-street parking. This can only be achieved by stricter control on the streets and elimination of the 'herring-bone' and 'right-angle' parking and removal of kerbside parking in Weyhill and West Street. These are the streets where east-bound vulnerable two-wheel vehicles are forced into meeting all oncoming vehicles including HGV's head-to-head. On-street parking in the key commercial and visitor areas acts as a discouragement to utility cycling: it should not do so. It is in parts of the High Street/West Street area an impediment to convenient pedestrian movement. I feel the proposed pedestrian route will fail to gain popularity. It is not at all attractive and does not improve access to the station. I doubt the willingness of cyclists to divert.</p>	<p>Unfortunately Neighbourhood Plan policy is not able to influence on-street parking provision. There are several opportunities within the Plan relating to sustainable transport and these will be pursued by community groups.</p> <p>The policy has been altered to provide flexibility regarding the proposed route.</p>	
<p>Webinar Absence of a policy to protect community buildings. I am interested in the absence of a policy to protect the community buildings because of my involvement in the Scouts and the challenges we have faced protecting the building from being bulldozed and replaced with commercial housing. Other neighbourhood plans, such as Farnham and Cranleigh, have explicit policies to protect community buildings and the number of community assets in each town.</p>	<p>This was considered but Waverley has a policy to protect community buildings in its Local Plan part 1 - Policy LRC 1 Existing open spaces, outdoor leisure and recreation facilities and a Neighbourhood Plan should not merely repeat local plan policy. Cranleigh's policy is specific to an infant school site that will be redeveloped. Cranleigh are able to include this because they are allocation sites. The Haslemere Neighbourhood Plan is not allocating sites. Farnham's Neighbourhood Plan was originally drafted when LPP1 was emerging and hence they included a policy very similar to LRC 1 in their plan.</p>	
<p>Survey additional comments I would strongly like to see more social policies being proposed to support community life in Haslemere but I'm not sure where this should appear but perhaps in this section. I am thinking of support for social clubs, youth and sports facilities, Haslemere Hall, village halls etc. We need places and things for the young to go to and do and indeed for everyone to foster community interaction and sense of identity. The whole policy seems to be silent on this and if it is, it is a major failure.</p>	<p>See response above.</p> <p>A Neighbourhood Plan's purpose is to set development policy and since the Haslemere Neighbourhood Plan is not allocating sites it cannot allocate sites for community facilities. Within the Opportunities section are projects to involve the community in the site plans for the Fairground site and West Street site where additional community facilities could be considered.</p>	

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Webinar My concern is that these policies were conceived in the Old Normal - Pre Covid. Are we in danger of proposing a plan that does not reflect the New Normal - whatever that may be?	Consideration was given to the changes that may remain post Covid and a separate section has been added at the beginning of the Plan.	Section on Covid Impact added